OPDC Regulation 19(2) Second Revised Draft Local Plan

Draft Policy Formulation Reports

Strategic Policies

Planning Committee Version

June 2018

Overview

Policy Formulation Reports are being produced to help demonstrate how individual policies have been developed.

These reports continue to be developed. Further updates will be made to them ready for the second Regulation 19 and to support the submission of the Local Plan.

As Strategic Policies, these policies have a close relationship with the Development Management Policies. To avoid unnecessary repetition, detailed policy context references can be found in the Policy Formulation Reports of these policies.

SP1: Catalyst for Growth

Legislation, Policy and Guidance Context

National Planning Policy Framework (NPPF)

Paragraph Reference	Paragraph
17	Planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
34	Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework.
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: ● the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; ● the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); ● the provision of health, security, community and cultural infrastructure and other local facilities;

National Planning Practice Guidance (NPPG)

Paragraph Reference	Paragraph
https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment	Housing and economic land availability assessment

London Plan (2016) Policies

Policy/paragraph reference	Paragraph
2.1	The Mayor and the GLA Group will, and all other strategic agencies should, ensure: a) that London retains and extends its global role as a sustainable centre for business, innovation, creativity, health, education and research, culture and art and as a place to live, visit and enjoy; and b) that the development of London supports the spatial, economic, environmental and social development of Europe and the United

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	Kingdom, in particular ensuring that London plays a distinctive and supportive part in the UK's network of cities.
2.13	B Development proposals within opportunity areas and intensification areas should: e support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration.
2.16	A The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than sub-regional importance (see para 2.77) by: a) co-ordinating public and private infrastructure investment b) bringing forward adequate development capacity c) placing a strong emphasis on creating a distinct and attractive business offer and public realm through design and mixed use development as well as any more specialist forms of accommodation d) improving Londoners' access to new employment opportunities.
4.1	A The Mayor will work with partners to: a2) maximise the benefits from new infrastructure to secure sustainable growth and development c) support and promote outer London as an attractive location for national government as well as businesses, giving access to the highly-skilled London workforce, relatively affordable work space and the competitive advantages of the wider London economy C In preparing LDFs, boroughs should: d) promote and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal
6.1	A The Mayor will work with all relevant partners to encourage the closer integration of transport and development through the schemes and proposals shown in **Table 6.1** and by: a encouraging patterns and nodes of development that reduce the need to travel, especially by car b seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand c supporting development that generates high levels of trips at locations with high levels of public transport accessibility and/or capacity, either currently or via committed, funded improvements including, where appropriate, those provided by developers through the use of planning obligations d improving interchange between different forms of transport, particularly around major rail and Underground stations, especially where this will enhance connectivity in outer London
	A The Mayor will work with strategic partners to:

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6.2

c increase the capacity of public transport in London over the Plan period by securing funding for and implementing the schemes and improvements set out in **Table 6.1**.

Table 6.1:

Scheme	Description	Cost	Anticipated completion date		
			2013-16	2017-22	2022+
Crossrail 1	Core scheme: Maidenhead and Heathrow in the west to Shenfield and Abbey Wood in the east	H		x	
High Speed 2	London to the West Midlands and beyond.	H			x

6.3

D Boroughs should take the lead in exploiting opportunities for development in areas where appropriate transport accessibility and capacity exist or is being introduced. Boroughs should facilitate opportunities to integrate major transport proposals with development in a way that supports London Plan priorities.

6.4

B The Mayor will work with strategic partners to improve the public transport system in London, including cross-London and orbital rail links to support future development and regeneration priority areas, and increase public transport capacity by:

a implementing Crossrail, the Mayor's top strategic transport priority for London (see Policy **6.5** and paragraph 6.21)

h improving and expanding London's international and national transport links for passengers and freight (for example, High Speed 2)

C DPDs should identify development opportunities related to locations which will benefit from increased public transport accessibility.

7.1

F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Opportunity Areas

	A To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will: 1) Provide support and leadership for the collaborative preparation and implementation of planning frameworks that: a) set out a clear strategy for accommodating growth b) assist in delivering specific infrastructure requirements that unlock capacity for new homes and jobs c) support regeneration d) are prepared in a timely manner. 2) Bring together the range of investment and intervention needed to deliver the vision and ambition for the area 3) Support and implement adopted planning frameworks, in order to give them appropriate material weight in planning decisions 4) ensure that his agencies (including Transport for London) work together and with others to promote and champion Opportunity Areas, and identify those that require public investment and intervention to achieve their growth potential 5) ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities 6) ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration 7) monitor progress in delivering homes, jobs and infrastructure, taking action where necessary to overcome any barriers to delivery 8) ensure that development facilitates ambitious transport mode share targets. B Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners 3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder consultation 10) work with the Mayor, local communities and other stakeholders to review appropriate locations and identify new Opportunity Areas. These should be distinct and significant locations that have capacity

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	for at least 5,000 new jobs and/or 2,500 new homes. Old Oak / Park Royal 2.1.57 The Mayor has established the Old Oak and Park Royal Development Corporation (OPDC) to drive forward regeneration of this area. A Local Plan has been published which recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners. 2.1.58 Old Oak Common station (connecting HS2, the Elizabeth Line and National Rail) is set to open in 2026. There are significant opportunities to bring forward regeneration in advance of this date around the existing and potential new rail stations in the area. This includes North Acton on the Central line and Willesden Junction on the Bakerloo Line and London Overground, as well as the potential new local stations at Hythe Road and Old Oak Common Lane on the Overground. 2.1.59 Park Royal is a strategically-important industrial estate for the functioning of London's economy and should be protected, strengthened and intensified.

Supplementary Planning Guidance (SPG)

Policy / paragraph reference	Policy and paragraph text
	Old Oak and Park Royal Opportunity Area Planning Framework SPG

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Catalyst uses: General support for catalyst uses in the area, with a number of suggestions for	General support: Old Oak Interim Forum, Old Oak Park (DP9), The Hammersmith Society, Hammersmith and	Noted. The Local Plan supports the potential for catalyst uses in the area, in Policy SP6. The Local Plan

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types of catalyst uses that could be supported and the criteria that could be applied for assessing applications. Opposition and support for a proposed sports stadium in the area. Opposition focussed on a sports stadium's significant infrastructure requirements and its impact on amenity. Support focussed on a sports stadium's ability to support placemaking and potentially justify higher densities.	Fulham Historic Buildings Group, 6 residents, 1 local business Oppose a sports stadium: Midland Terrace Resident's Group, Old Oak Interim Forum, Old Oak Park (DP9), Grand Union Alliance, 1 local resident (in opposition) Support a sports stadium: QPR, 7 local residents, 2 local businesses and 2,185 standard QPR supporter responses	now includes a criteria based policy (TCC8) to assess the acceptability of different catalyst uses. This approach will ensure that for any future catalyst use to be appropriate it will be assessed against a range of policy requirements. This policy will be supported by evidence from a Catalyst Uses Study.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Cultural Principles	• Ensure the Local Plan highlights the importance of culture to the area. • Ensure that character, heritage and culture sit at the heart of placemaking. • Develop a Cultural Strategy to further consider opportunities for culture in the OPDC area. • Ensure that consultation is meaningful, that it reaches as many people and communities as possible, and that it includes young people and families. • Encourage 'anchor' tenants and cultural institutions to locate in the area, and explore options for attracting and retaining creative businesses and affordable workspace
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade

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	activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. • Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations.
Housing Evidence Base Statement	• There is a significant opportunity at Old Oak and Park Royal to provide a significant number of new homes to meet local and London housing needs. • Given the strategic importance of development envisaged for this area, it is not considered appropriate to assess housing need within the OPDC red line alone. The housing market area has been extended to include the combined area of the London Boroughs of Brent, Ealing and Hammersmith & Fulham. • There is an 86% need for London Affordable Rent housing because of the high cost of housing within the housing market area. This does not necessarily mean that these households would necessarily qualify for council housing. The level of London Affordable Rent housing delivered has a significant impact on financial viability. • OPDC will have overarching 50% affordable housing target measured by habitable room with a tenure split of 30% London Affordable Rent and 70% Intermediate housing including Shared Ownership and London Living Rent in order to maximise the overall level of affordable housing delivered. • Setting an artificially high family housing target would mean that many units delivered would not have access to acceptable private or communal amenity space or other amenities. These units would unlikely be attractive to families with children.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not

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		including
N/A	• N/A	• N/A

Other evidence base

Supporting Study	Recommendations
	• **None**

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SP2: Good Growth

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
15	Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.
17	Planning should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy) Planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.
37	Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
56	The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
57	It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
58	Planning policies and decisions should aim to ensure that developments: • will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; • establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; and • are visually attractive as a result of good architecture and appropriate landscaping
69	Planning policies and decisions, in turn, should aim to achieve places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street

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	frontages which bring together those who work, live and play in the vicinity.
93	Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.
94	Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change,16 taking full account of flood risk, coastal change and water supply and demand considerations.
99	Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver climate change mitigation and adaptation.

National Planning Practice Guidance (NPPG)

Climate Change

Policy / paragraph reference	Policy and paragraph text
001	Local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment. To be found sound, Local Plans will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Design

Policy / paragraph reference	Policy and paragraph text
001	Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.

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003	Local planning authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning, and should be at the heart of the plan making process.
006	Design impacts on how people interact with places. Although design is only part of the planning process it can affect a range of economic, social and environmental objectives beyond the requirement for good design in its own right. Planning policies and decisions should seek to ensure the physical environment supports these objectives. The following issues should be considered: • local character (including landscape setting) • safe, connected and efficient streets • a network of greenspaces (including parks) and public places • crime prevention • security measures • access and inclusion • efficient use of natural resources • cohesive and vibrant neighbourhoods
013	The structure, layout and design of places can help reduce their resource requirements in terms of energy demands, water and land take, and help to sustain natural ecosystems Having a mix of uses and facilities within a neighbourhood can reduce travel demand and energy demands.
014	The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.
019	Successful places can adapt to changing circumstances and demands. They are flexible and are able to respond to a range of future needs, for example, in terms of working and shopping practices and the requirements of demographic and household change. Buildings often need to change their use over time, for example from offices to housing. Designing buildings that can be adapted to different needs offers real benefits in terms of the use of resources and the physical stability of an area. Design features such as the position and scale of entrances and circulation spaces, and the ability of the construction to be modified, can affect how easily buildings can adapt to new demands. Places that are easy and practical to manage well tend to be more resilient. For example, where maintenance and policing are supported by

	good access, natural surveillance and hard wearing, easy to repair, materials.

Health and well-being

Policy / paragraph reference	Policy and paragraph text
002	The range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, include how: • potential pollution and other environmental hazards, which might lead to an adverse impact on human health, are accounted for in the consideration of new development proposals; and • access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted.

London Plan (2016)

Policy / paragraph reference	Policy and paragraph text
3.2	A The Mayor is committed to ensuring equal life chances for all Londoners. Meeting the needs and expanding opportunities for all Londoners – and where appropriate, addressing the barriers to meeting the needs of particular groups and communities – is key to tackling the huge issue of inequality across London.
4.1	The Mayor will work with partners to: b) drive London's transition to a low carbon economy and to secure the range of benefits this will bring
5.1	B Within LDFs boroughs should develop detailed policies and proposals that promote and are consistent with the achievement of the Mayor's strategic carbon dioxide emissions reduction target for London.
5.3	C Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles: a minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems) c efficient use of natural resources (including water), including making the most of natural systems both within and around buildings d minimising pollution (including noise, air and urban runoff) e minimising the generation of waste and maximising reuse or recycling f avoiding impacts from natural hazards (including flooding) h securing sustainable procurement of materials, using local supplies where feasible

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5.18	A New construction, excavation and demolition (CE&D) waste management facilities should be encouraged at existing waste sites, including safeguarded wharves, and supported by: b ensuring that major development sites are required to recycle CE&D waste on-site, wherever practicable, supported through planning conditions.
7.1	A In their neighbourhoods, people should have a good quality environment in an active and supportive local community based on the lifetime neighbourhoods principles set out in paragraph 7.4A. C Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods.
7.6	A Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. B Buildings and structures should: a be of the highest architectural quality e incorporate best practice in resource management and climate change mitigation and adaptation g be adaptable to different activities and land uses, particularly at ground level

Draft New London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
GG1	Building strong and inclusive communities To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must: A Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city. B Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation. C Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish. D Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.

	E Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements. F Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.
GG2	Making the best use of land To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites. B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach. C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character. D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening. E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth. F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance
GG3	Creating a healthy city To improve Londoners' health and reduce health inequalities, those involved in planning and development must: A Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities. B Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. C Use the Healthy Streets Approach to prioritise health in all planning decisions. D Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments. E Plan for improved access to green spaces and the provision of new green infrastructure. F Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold. G Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.

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GG4	Delivering the homes Londoners need To create a housing market that works better for all Londoners, those involved in planning and development must: A Ensure that more homes are delivered. B Support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable. C Create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing. D Identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset. E Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.
GG5	Growing a good economy To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must: A Promote the strength and potential of the wider city region. B Seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London. C Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration. D Ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth. E Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning. F Promote and support London's rich heritage and cultural assets, and its role as a 24-hour city. G Maximise London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.
GG6	Increasing efficiency and resilience To help London become a more efficient and resilient city, those involved in planning and development must: A Seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050. B Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect. C Create a safe and secure environment which is resilient against the impact of emergencies including fire and terrorism. D Take an integrated approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

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Supplementary Planning Guidance (SPG)

Policy / paragraph reference	Policy and paragraph text
Social Infrastructure SPG Implementation Point 1	In implementing London Plan policies and especially Policy 7.1, the Mayor will, and boroughs and other partners are advised to plan for neighbourhoods which are mixed in use and tenure, and easy and attractive to get around on foot.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Homes and jobs targets: Question the homes and jobs targets in the Local Plan. Some consultees consider that the figures should be higher, whereas others suggest that the figures should be lower. Request that further work should be undertaken to assess whether the London Plan targets are appropriate and provide justification for why the densities proposed within the Development Capacity Study are appropriate	Hammersmith and Fulham Council, Ealing Council, TITRA, Diocese of London, Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, the Hammersmith Society, Wells House Road Resident's Association, London Sustainable Development Commission, MP for Hammersmith, 4 local residents	No change proposed. The OPDC Local Plan is required to be general conformity with the London Plan and the minimum housing targets for Old Oak and Park Royal. Further work has been undertaken as part of OPDC's Development Capacity Study to test the appropriateness of housing targets in the Local Plan. The Development Capacity Study has been undertaken in accordance with national policy guidance. The Development Capacity Study work has informed the revised targets in the Regulation 19 draft Local

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		Plan. The acceptability of any specific development proposal would be judged against the policies in the Local Plan, which includes policies which ensure that design is of a high quality and is in accordance with the principles of sustainable development.
Homes vs Jobs: Too many jobs are proposed and not enough homes	3 local residents	No change proposed. There is a need for the OPDC Local Plan to be in general conformity with the London Plan, which identifies the need to deliver a minimum 25,500 homes and 65,000 jobs in the OPDC area. OPDC considers that the homes and jobs figures to strike the right balance between the need for homes and jobs in the area. The level of transport access and the sites' location make Old Oak and Park Royal an excellent future employment location. This will help London's global competitiveness. This mix of employment and homes will also help create a mixed community. Employment provision is being further tested through OPDC's Future Growth Sectors Study, which will inform the next draft Local Plan.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

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Supporting Study	Recommendations
Environmental standards study	• High density development poses significant challenges to the quality of development in Old Oak and Park Royal. The adoption of short, medium and long term targets should inform all development and applied rigorously or the overall quality of the development and its impact on London could be significant. • Energy use and associated carbon emissions should be measured and assessed rigorously to ensure that the development supports the Mayor's long term aspirations to create a zero carbon city and to meet the zero carbon development requirements established by the mayor for new development. • Water must be managed with care to comply with the IWMS including achieving green field runoff rates and adopting rainwater harvesting and grey water recycling. • Waste in high density development can be very challenging to manage. Targets should therefore be carefully assessed and adopted by development coming forward.
Circular and Sharing Economy Study	• To develop initiatives that will promote CSE in construction and operational phases of the project wide scale buy in from developers and businesses is required. OPDC should establish a team to work to secure support. • Target key sectors including food, logistics, clean technology, the sharing economy and smart technology. • Adopt CSE approaches to design of infrastructure development including for example in looking at clean and low carbon sources of energy, water and waste and infrastructure that supports reuse of those resources • Adopt innovation in CSE in building design for example in design for disassembly and adaptation. • Work with West London Business and Park Royal Business Groups to promote circular economy. • Embed CSE objectives into procurement policy • Embed CSE requirements into policy as far as possible • Work with the GLA, LWARB and Central Government to promote CE • Establish clear objectives and targets for CSE on projects especially on development that is either funded or is developed on public land • Look at ways to capture and include the value (economic, social and environmental) that CE delivers over the long term in assessing development. • Support investment in business and innovation in the CSE in the OPDC area especially in Park Royal
Smart Strategy	• Deliver a secure and open, interoperable digital environment. • Utilise technology and digital systems to: o assist in the planning, delivery and management of development o create opportunities and address challenges o enhance quality of life for residents, employees and visitors • Incentivise the growth of emerging smart city economic sectors. • Embed flexibility and agility in the built and natural environment alongside infrastructure to accommodate change.

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	• Explore and support the use of emerging transport modes • Establish and manage an urban digital platform. • Require the use and delivery of the most recent Building Information Modelling data for development and infrastructure proposals. • Deliver integrated utilities infrastructure that is planned and managed through sensors to increase efficiencies and minimise disruptions to the public realm. • Consider using appropriate technology to improve and support the safety of people and the wider built environment. • Make use of emerging construction techniques to support the delivery of resilient low-carbon and energy efficient buildings and spaces that help to actively address pollution.
Statement of Community Involvement	• 10 ground rules for engagement are identified: inclusive invitation, authorisation, continuity, independent advice, early involvement, presenting options, choosing between options, consensus, transparent records and feedback on the outcome of community involvement

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	• N/A	• N/A

Other evidence base

Supporting Study	Recommendations
	• **None**

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SP3: Improving health and reducing health inequalities

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	Planning should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.
171	Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being

National Planning Practice Guidance (NPPG)

Design

Policy / paragraph reference	Policy and paragraph text
012	The layout and design of buildings and planting can reduce energy and water use and mitigate against flooding, pollution and over heating.

Health and well-being

Policy / paragraph reference	Policy and paragraph text
002	The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. The importance of this role is highlighted in the promoting health communities section. This is further supported by the 3 dimensions to sustainable development. The range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, include how: • Development proposals can support strong, vibrant and healthy communities and help create healthy living environments which

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005	should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital • the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities • opportunities for healthy lifestyles have been considered (eg planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation) A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage: • Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport. • The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
3.2	E Boroughs should: a) work with key partners to identify and address significant health issues facing their area and monitor policies and interventions for their impact on reducing health inequalities b) promote the effective management of places that are safe, accessible and encourage social cohesion c) integrate planning, transport, housing, environmental and health policies to promote the health and wellbeing of communities d) ensure that the health inequalities impact of development is taken into account in light of the Mayor's Best Practice Guidance on Health issues in Planning.
5.3	C Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:

	b avoiding internal overheating and contributing to the urban heat island effect g ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG3	Creating a healthy city To improve Londoners' health and reduce health inequalities, those involved in planning and development must: A Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities. B Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. C Use the Healthy Streets Approach to prioritise health in all planning decisions. D Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments. E Plan for improved access to green spaces and the provision of new green infrastructure. F Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold. G Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.
S2	Health and social care facilities A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to: 1) identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies 2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes 3) regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues 4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision 5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses. B Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care

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	should be supported. C New facilities should be easily accessible by public transport, cycling and walking.

Supplementary Planning Guidance (SPG)

Policy / paragraph reference	Policy and paragraph text
Social Infrastructure SPG Implementation Point 2	In implementing London Plan policies and especially Policy 3.2, and Policy 3.16, the Mayor will, and boroughs and other partners are advised to: - apply HIAs wherever a development or plan may have significant implications for people's health and wellbeing. - Consider the possibilities for development plans in Opportunity Areas to improve health outcomes and facilities particularly where these coincide with areas of multiple deprivation

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Public health: Support for wider role of public health and looking at a broader range of health provision and how this could be achieved through the healthy new town concept.	LSDC, Brent Council, Midland Terrace Resident's Group, Old Oak Park (DP9), 1 local resident	Noted. OPDC is also supportive and acknowledges the importance of public health and has appointed a dedicated Health Advisor who will be working collaboratively with a range of stakeholders to help embed public health objectives into relevant policies and strategies. The revised Local Plan includes details of required on-site healthcare provision

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		in Policy TCC4, in relevant place policies and in OPDC's infrastructure Delivery Plan (IDP).

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Environmental Standards Study	• Minimum standards for air quality, noise and vibration should be set that exceed the government targets by ensuring that development assesses and adopts measures to deliver high quality development to support health and well being of local communities.
Development Infrastructure Funding Study	• The scale of population growth at Old Oak effectively means that we are dealing with a new town. There will be 24,000 new homes, and so social infrastructure requirements are substantial. We see a need for around £191m (gross) of new social infrastructure needed for a thriving new community, including new schools, open space, play space, and community centres. • Service providers remain under great pressure to deliver services for less money. This is likely to continue to force significant innovations in service delivery and estates strategies. 30.78 A steering group will be able to keep the OPDC informed of these changes and ensure that the future infrastructure is tailored to future delivery strategies.
Social Infrastructure Needs Study	• 1 primary school • 1 secondary school • 1 health hub • Expansions to Central Middlesex Hospital and Hammersmith Hospital • 4 supernurseries • 2 community hubs • 2 sports centres
Infrastructure Delivery Plan	• The items identified in the Infrastructure Schedule for health focus on primary health provision. Other types of health provision may be required as development proposals come forward and the OPDC gains a better understanding of the future population. Currently the proposals focus on the expansion of two existing primary care facilities and the delivery of a new facility within the OPDC area. These projects are supported by Policy TCC4 of the regulation 19 OPDC Local Plan 2017 and the following studies;

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	Development Infrastructure Funding Study (DIFS); Social Infrastructure Needs Study and the Precedents Study.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	**N/A**	**N/A**

Other evidence base

Supporting Study	Recommendations
	• **None**

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SP4: Thriving communities

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	Planning should proactively drive and support sustainable economic development to deliver the homes … and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing … needs of an area, and respond positively to wider opportunities for growth. Planning should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.
37	Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
38	Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.
50	To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should: ● plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); ● identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
70	To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: • the homes … needed in the area; • the provision of health, security, community and cultural infrastructure and other local facilities
173	Pursuing sustainable development requires careful attention to viability and

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	costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	**Policy and paragraph text**
What is the purpose of the assessment of housing and economic development needs guidance? Paragraph: 001 Reference ID: 2a-001-20140306 Revision date: 06 03 2014	This guidance supports local planning authorities in objectively assessing and evidencing development needs for housing (both market and affordable); The assessment of housing needs includes the Strategic Housing Market Assessment requirement as set out in the National Planning Policy Framework.
What is the primary objective of the assessment? Paragraph: 002 Reference ID: 2a-002-20140306 Revision date: 06 03 2014	The primary objective of identifying {housing) need is to: • identify the future quantity of housing needed, including a breakdown by type, tenure and size; • provide a breakdown of that analysis in terms of quality and location, and to provide an indication of gaps in current land supply.
What is the definition of need? Paragraph: 003 Reference ID: 2a-003-20140306 Revision date: 06 03 2014	Need for housing in the context of the guidance refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand. Need for all land uses should address both the total number of homes or quantity of economic development floorspace needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment. Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios,

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	only future scenarios that could be reasonably expected to occur.
Can local planning authorities apply constraints to the assessment of development needs? Paragraph: 004 Reference ID: 2a-004-20140306 Revision date: 06 03 2014	The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.
What can the Community Infrastructure Levy be spent on (and by whom)? Paragraph: 071 Reference ID: 25-071-20140612 Revision date: 12 06 2014	The levy can be used to fund a wide range of infrastructure, including transport, flood defences, schools, hospitals, and other health and social care facilities (for further details, see section 216(2) of the Planning Act 2008, and regulation 59, as amended by the 2012 and 2013 Regulations). This definition allows the levy to be used to fund a very broad range of facilities such as play areas, parks and green spaces, cultural and sports facilities, academies and free schools, district heating schemes and police stations and other community safety facilities. This flexibility gives local areas the opportunity to choose what infrastructure they need to deliver their relevant Plan (the Local Plan in England, Local Development Plan in Wales, and the London Plan in London). Charging authorities may not use the levy to fund affordable housing. Local authorities must spend the levy on infrastructure needed to support the development of their area, and they will decide what infrastructure is needed. The levy is intended to focus on the provision of new infrastructure and should not be used to remedy pre-existing deficiencies in infrastructure provision unless those deficiencies will be made more severe by new development. The levy can be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development. In London, the regulations restrict spending by the Mayor to funding roads or other transport facilities, including Crossrail, to ensure a balance between the spending priorities of the boroughs and the Mayor. Local authorities must allocate at least 15% of levy receipts to spend on priorities that should be agreed with the local community in areas where development is taking place. This can increase to a minimum of 25% in certain circumstances.

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London Plan (2016)

Policy / paragraph reference	Policy and paragraph text
3.3	D) Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1, if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target. Da) Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need (see Policy 3.8) and supply in line with the requirement of the NPPF E) Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including: - opportunity and intensification areas and growth corridors (see policies 2.13 and 2.3)
3.16	E) Boroughs should ensure that adequate social infrastructure provision is made to support new developments. If the current use of a facility is no longer needed, boroughs should take reasonable steps to identify alternative community uses where the needs have been identified. Adequate provision for social infrastructure is particularly important in areas of major new development and regeneration and should be addressed in opportunity area planning frameworks and other relevant area action plans.
7.1	B Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
H1	A. Table 4.1 sets the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents. B. To ensure that ten-year housing targets are achieved: 1. boroughs should prepare delivery focused Development Plans which: a. allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification b. encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2 c. enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA. 2. boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development

	Plans and planning decisions, especially the following sources of capacity: a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary b) mixed-use redevelopment of car parks and low-density retail parks c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses d) the redevelopment of surplus utilities and public sector owned sites e) small housing sites (see Policy H2 Small sites) f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function. C. Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes. D. Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 which identify the sources of housing capacity (including windfall) expected to contribute towards achieving housing targets and should work with the Mayor to resolve any anticipated shortfalls. E. Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels. F. On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.
H3	A. The strategic target is for 50 per cent of all new homes delivered across London to be affordable. Specific measures to achieve this aim include: 1. requiring residential and mixed-use developments to provide affordable housing through the threshold approach (Policy H6 Threshold approach to applications) 2. using grant to increase affordable housing delivery beyond the level that would otherwise be provided 3. affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio 4. public sector land delivering at least 50 per cent affordable housing across its portfolio 5. strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio. B. Affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners. Affordable housing must only be provided off-

	site or as a cash in lieu contribution in exceptional circumstances.
S1	C. Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities. D. In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans. E. Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. F. Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities. G. New facilities should be easily accessible by public transport, cycling and walking. H. Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless: 1. there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or; 2. the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services. I. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.

S2	A. Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to: 1. identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies 2. understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes 3. regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues 4. identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision 5. identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses. B. Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported. C. New facilities should be easily accessible by public transport, cycling and walking.
S3	A. To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should: 1. identify and address local needs and any shortages in supply, both locally and sub-regionally, including cross-boundary issues 2. identify sites for future provision through the Local Plan process, particularly in areas with significant planned growth and/or need 3. ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need. B. Development proposals for education and childcare facilities should: 1. locate facilities in areas of identified need 2. locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling 3. locate entrances and playgrounds away from busy roads, with traffic calming at entrances 4. link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling 5. maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures 6. encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities 7. ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach 8. ensure that facilities incorporate suitable, accessible outdoor space 9. locate facilities next to parks or green spaces, where possible

	10. ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.
S4	A. Boroughs should: 1. undertake audits of existing play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision 2. produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs. B. Development proposals for schemes that are likely to be used by children and young people should: 1. increase opportunities for play and informal recreation and enable children and young people to be independently mobile 2. for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: a. provides a stimulating environment b. can be accessed safely from the street by children and young people independently c. forms an integral part of the surrounding neighbourhood d. incorporates trees and/or other forms of greenery. 3. incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently 4. for large-scale public realm developments, incorporate incidental play space to make the space more playable 5. not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand

Social Infrastructure Supplementary Planning Guidance (SPG) 2015

Policy / paragraph reference	**Policy and paragraph text**
Chapter 3 Planning for Social Infrastructure	Future social infrastructure requirements will be determined by projections of future population needs and capacity of current provision to meet those needs. *Future population needs* Estimates of future social infrastructure requirements will be influenced by population projections and housing trajectories. The 2015 London Plan is based on the GLA's own population and household projections. These are considered more authoritative than projections currently provided by ONS and Department for Communities and Local Government (DCLG). It is not only the size, but the composition of the future population and housing stock that should be considered when assessing future service need. In particular, residential unit size and tenure and future population characteristics are important considerations. Residential unit size and tenure will influence the type of occupancy of housing stock. For example, large privately owned housing tends to have lower occupancy rates, whereas social rented housing is likely to have the highest occupancy rates, which will have significant impacts on local population numbers. The socio-economic characteristics (including age, household composition,

	disability, and ethnicity) of the future population living in existing and planned developments will play a key role in determining their specific social infrastructure needs. For example, an ageing population will place a higher burden on health and social care services (see Chapter 5 of this SPG), while rising birth rates impact on the required number of school places and safe places to play. The type of migration, both inwards and outwards, will also have an important impact on the future composition of a population. *Current infrastructure surplus or deficit* The analysis of the condition and capacity of existing social infrastructure in stage 2 may identify geographic areas of current surplus or deficiency. Combining this information with projections of population growth, demographic change and associated service needs, will help to identify localities with future deficiencies or surpluses in services/facilities. In commercial areas, the social infrastructure needs of increased daytime populations resulting from business, office and retail floor space projections should also be considered. In the unique circumstances of the Central Activity Zone (CAZ), London Plan Policy 2.12 requires boroughs to work with social infrastructure providers to meet the needs of both local residents and the large numbers of visitors and workers. *Future social infrastructure requirements* Once future population needs have been determined and areas of surplus or deficit identified, this information should be used to forecast associated social infrastructure services/facilities requirements – including access, space requirements and/or the need to remodel services. Boroughs should work with service providers to agree any standards of provision for different services and subsequent space requirements as these are a matter for local determination. Analytical tools available to support this analysis are listed in Figure 5 below. Identified future social infrastructure requirements should then be mapped to compare current capacity and accessibility of services/facilities with the location and scale of new demand.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	**Policy and paragraph text**
OSP2	There was no Thriving Communities Policy in the Regulation 18 Local Plan. However, OSP2 covered homes targets and the need to provide the social infrastructure to support the new population. No reasonable alternative policy options were identified. This is because OPDC's Local Plan must be in general conformity with the London Plan and seek to meet the identified homes targets as set out in table 4.1 in the draft London Plan 2017.
S1	Require new social infrastructure to be provided solely on-site rather than looking to expand surrounding existing facilities. This approach would help with placemaking, by delivering a range of community facilities on-site in earlier development phases. This approach may also have benefits on the transport network as new residents would not have to travel as far to access community uses. However, this option would

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	not help to knit the residents and employees on early sites with the existing community and may leave these sites feeling isolated in early years.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Homes and jobs targets: Question the homes and jobs targets in the Local Plan. Some consultees consider that the figures should be higher, whereas others suggest that the figures should be lower. Request that further work should be undertaken to assess whether the London Plan targets are appropriate and provide justification for why the densities proposed within the Development Capacity Study are appropriate	Hammersmith and Fulham Council, Ealing Council, TITRA, Diocese of London, Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, the Hammersmith Society, Wells House Road Resident's Association, London Sustainable Development Commission, MP for Hammersmith, 4 local residents	No change proposed. The OPDC Local Plan is required to be general conformity with the London Plan and the minimum housing targets for Old Oak and Park Royal. Further work has been undertaken as part of OPDC's Development Capacity Study to test the appropriateness of housing targets in the Local Plan. The Development Capacity Study has been undertaken in accordance with national policy guidance. The Development Capacity Study work has informed the revised targets in the Regulation 19 draft Local Plan. The acceptability of any specific development proposal would be judged against the policies in the Local Plan, which includes policies which ensure that design is of a high quality and is in accordance with the principles of sustainable development.
New social infrastructure: Infrastructure should be included as part of the development. It was recognised that these may be isolated in the early phases so the expansion of existing facilities should be explored; however, it was also noted that existing education and health	Brent Council; Royal Borough of Kensington and Chelsea; Diocese of London; Midland Terrace Resident's; Old Oak Interim Forum; Hammersmith and Fulham Council, 1 local resident	Change proposed. OPDC's Local Plan is now supported by more detailed evidence on social infrastructure. This includes the allocation of sites to deliver required on-site infrastructure. Social infrastructure requirements are set out in Policies TCC4 and in the place policies, specifically Policy P1 (Old

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infrastructure may already be under strain/ have no spare capacity.		Oak South), P2 (Old Oak North) and North Acton and Acton Wells (P7).

Regulation 19 (1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Do not consider Policy SP4 on Thriving Communities to be 'positively prepared' in respect of the housing element of these policies and based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red-line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF and existing guidance on assessing housing need in strategic housing market assessments. Based on a current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). However, as Opportunity Areas identified in the London Plan with the capacity to provide at least 25,500 homes, Old Oak and Park Royal can also help to meet city-wide housing need. The Development Capacity Study is part of the evidence base of this Local Plan identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. Given the overall quantum of homes to be

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		delivered (approx. 20,000 over the Local Plan period), the objectively assessed housing needs within OPDC's red-line boundary will be met in full. However, the development will also help to meet wider housing needs in the wider housing market area of London Boroughs of Brent, Ealing and Hammersmith & Fulham and also help meet strategic London-wide housing need. OPDC considers it is a sound approach to meet local objectively assessed needs and fulfil a role in meeting the needs of the host local authorities and the wider London area. The targets in OPDC's Local Plan are considered to be in general conformity with the Mayor's London Plan targets for the area.
Support aims of policy, but encourage OPDC to work with partners to enable early delivery.	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Noted.
Overall supports delivery of much needed housing and associated social infrastructure but suggests that more housing could be delivered. More information could be provided in the Local Plan on how OPDC will influence/encourage delivery.	Association for Consultancy and Engineering (ACE)	No change proposed. As outlined in SP10, OPDC's Development Capacity Study has assessed the capacity for new homes in the area. This is reflected in OPDC's housing targets. Timing and phasing is critical to the delivery of OPDC's housing targets. OPDC's Absorption Rate Study has assessed typical delivery rates across large regeneration schemes in London over recent years, and has concluded, given the scale of the site, that there are multiple delivery markets within Old Oak and Park Royal that means that the housing targets may be delivered. In addition, OPDC has carried out a Social Infrastructure Study to identify the social infrastructure requirements

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		for the area. The Delivery and Implementation Chapter 11 details how as a proactive planning authority, OPDC will support the timely delivery of new homes and optimised phasing to meet, and where possible, exceed the housing targets.
Projections for thriving communities seem excessively positive and therefore unsound.	Friary Park Preservation Group	No change proposed. This strategic policy aims to promote lifetime neighbourhoods, social cohesion and the integration of new and existing communities through the delivery of new homes to meet housing needs along with new social infrastructure.
There is no justification for an 'objectively-assessed need' for 24,000 new homes at Old Oak.	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red-line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF. Based on this approach, and the OPDC area's current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). The Development Capacity Study identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively assessed

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		housing needs within OPDC's red-line boundary will be met in full. However, the development will also help to meet wider housing needs in the wider housing market area of London Boroughs of Brent, Ealing and Hammersmith & Fulham and as Opportunity Areas help meet strategic London-wide housing need.
OPDC has not considered an alternative vision with a lower housing target for Old Oak which would be significantly more successful and sustainable.	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The legal requirement is to test 'reasonable' alternatives that are sufficiently distinct to enable their meaningful comparison. The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal are specifically referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015. The FALP, together with the OAPF set a strategic development capacity target for the OPDC area and it would therefore not have been appropriate to test

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		lower development capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan. OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable. It should be noted that LBHF's Issues and Options consultation was undertaken in advance of the consultation on and publication of the Mayor's Old Oak and Park Royal Opportunity Area Planning Framework and in advance of the publication of the London Plan (2015).
The housing targets are based on the land that is available for development. This involves rafting over areas that may be too difficult and expensive.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's Development Capacity Study has assessed the capacity for new homes in the area. The challenges of delivering this, including relocating, reconfiguring and decking over a number of large-scale operations are referenced in the supporting text for Policy SP10.
The housing targets should be reduced to be consistent with the 'central' classification in the London Plan or the plan should be found unsound.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. In light of the future excellent national, regional and local public transport links to be provided in the area, Old Oak is considered suitable for high density development and Park Royal is considered suitable for protected and intensified industrial uses. This approach is supported by policies set out in the London Plan and reflected in the designation of two Opportunity Areas with a combined target for a minimum of 25,500 new homes and 65,000 new jobs. Opportunity Areas are London's main reservoirs for

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		growth. As such, the current London Plan 2016 (Policy 2.13) supports development in these areas to exceed the defined targets by optimising development densities. The Mayor of London's Housing SPG (2016) states that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2). Policy SP9 in this Local Plan requires development to respond to local character and context but 'reflecting' local context would be inappropriate, especially given the area's identification as opportunity areas and potential as set out in the London Plan, for the area to deliver high densities and tall buildings. The draft London Plan 2017 removes the density matrix and instead requires a design- led approach that optimises densities.
Policy SP4 promotes lifetime neighbourhoods, social cohesion and the integration of new and existing communities. Policy SP4ii is of no direct relevance to the achievement of this objective and should be deleted as a sub-clause.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The regeneration of Old Oak and Park Royal can play an important role in meeting both local objectively assessed need and London-wide 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 with lifetime neighbourhoods as envisaged in the Thriving Communities Policy.

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As part of the strategic policy for housing there should be a mix of housing types but with the overwhelming priority on social rented housing at rents that people on low incomes can afford.	Harlesden Lets	No change proposed. SP4a)i) explains that proposals should provide a range of housing tenures, types and sizes that deliver mixed and inclusive communities and help meet local and London-wide need. Chapter 8, and particularly Policy H2, detail the requirements for different types of affordable housing, including London Affordable Rent (based on target rents, formerly known as social rent). The tenure requirements are in accordance with the Mayor of London's Affordable Housing and Viability SPG (2017) and the draft London Plan 2017.
Diversity in design should be recognised so that apartments, houses, town houses, mansion blocks as well as dwellings for elderly residents and easily-adaptable homes for disabled people are all part of the mix.	Harlesden Lets	No change proposed. SP4a)i) explains that proposals should provide a range of housing types and sizes that deliver mixed and inclusive communities. Policy H3 states that housing should be flexibly designed and adaptable. Policy H9 supports the delivery of specialist housing to meet the needs of older people and other people with specialist housing needs, such as people with physical disabilities.
SP4(a)i should be amended to: 'homes that provide a proportionate level of all types of homes to meet objectively assessed need (as required by the NPPF) which will positively contribute to meeting London-wide need'.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed to policy. However, some additional text has been added to the supporting text which clarifies that the overall capacity of the development will enable OPDC to meet its objectively assessed need as well as contribute towards meeting London-wide housing need.
The OPDC's evidence base does not provide evidence to support delivery of a 50% affordable housing target	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. In accordance with the NPPF, the Local Plan needs to meet the full, objectively assessed needs for market and affordable housing in the

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	Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	local housing market area. As set out in the Housing Evidence Statement, according to OPDC's Strategic Housing Market Assessment (SHMA), there is a 45% affordable housing need in the area. As Opportunity Areas, Old Oak and Park Royal can also help to meet city-wide housing need. The latest 2017 GLA SHMA published along with the Draft London Plan identifies that London's affordable housing need has increased to 65 per cent because needs have not been met. Therefore a 50 per cent affordable housing target for OPDC is considered to be appropriate for the following reasons: the Draft London Plan 2017 specifies an overarching 50% affordable housing target; including 50 per cent affordable housing for public sector land, Strategic Industrial Locations, and Locally-Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses. The Mayor's draft Housing Strategy also sets a target for Mayoral organisations for an average of 50 per cent of homes on land brought forward under the current administration to be affordable. An Affordable Housing Viability Assessment (2017) has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure split: 70% London Affordable Rent/30% Intermediate; 43% London Affordable Rent/57% Intermediate; 30% London Affordable Rent/70% Intermediate. This concluded

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		that: 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing; 30% London Affordable Rent/70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. Accordingly, it is considered that this provides evidence to support a 50% affordable housing target for OPDC.
The proposed tenure split will not meet the objectively assessed housing need.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The strategic policy refers to OPDC's overarching 50% affordable housing target. However, some supporting text has been added to clarify that the quantum of housing enables OPDC to meet its objectively assessed need. Details on housing tenure are contained in Policy H2.
Add after 'population', 'of all ages, abilities/disabilities and income' (to ensure delivery of mixed and inclusive communities).	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy SP9a)vi) sets out how the built environment will be required to demonstrate a high standard of accessible and inclusive design. Policy D3 sets out more details of requirements for accessible and inclusive development that is compliant with the latest guidance and deliver design solutions that meet the requirements of all users.
Add (c) securing delivery of active community involvement and ownership.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy DI3d) supports community ownership and management programmes. It is not considered necessary to repeat this in this strategic policy.
Add (d) delivering tangible	Grand Union Alliance, Wells	No change proposed. The

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and measurable benefit to existing deprived and excluded community members in surrounding neighbourhoods.	House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	main focus of this policy is homes and infrastructure and integration of new and existing communities. The spatial vision and strategic policies as a whole describe how the regeneration of Old Oak and Park Royal can benefit existing deprived communities in surrounding neighbourhoods. Figure 2.1 in the Spatial Vision provides a summary of the opportunities to create a socially, environmentally and economically sustainable community in Old Oak and Park Royal.
Support for the aspiration to deliver the amount of homes to meet a range of needs and in fact more homes could be delivered to meet the housing need, subject to infrastructure and viability considerations	Association for Consultancy and Engineering (ACE)	Noted. The housing targets are minimum targets.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	**Recommendations**
Development Capacity Study	Approximately 20,100 new homes can be delivered during the 20 year plan period.
Absorption Rate Study	• Given the scale of the site, the research concludes that there are multiple markets within Old Oak and Park Royal and therefore promotes an average delivery rate of up to 700 private homes a year. • Homes for rent (affordable and market) do not compete with private homes for sale as they are targeted at a different market and can increase the overall number of homes delivered on the site. • Shared ownership homes compete for purchasers with entry level market homes for sale.
Housing Evidence Statement	• There is significant opportunity at Old Oak and Park Royal to provide a significant number of new homes to meet local and London housing needs. • Setting an artificially high family housing target would mean that many units delivered would not have access to acceptable private or communal amenity space or other amenities. These

	units would unlikely be attractive to families with children.
Strategic Housing Market Assessment (SHMA)	• Between 2018 and 2038 there is a need for 1,200 homes within the OPDC redline boundary and 99,000 homes within the housing market area defined across the London Boroughs of Brent, Ealing and Hammersmith and Fulham. • Over the Plan period 44,400 households cannot afford market housing and have a requirement for affordable housing. • 86% of these households can only afford low-cost housing such as social rent, i.e.: London Affordable Rent. 14% can afford intermediate housing.
Gypsy & Traveller Accommodation Needs Assessment (GTANA)	• There is no need for additional pitches during the Local Plan period in accordance with Planning Policy for Traveller Sites (PPTS).
Affordable Housing Viability Assessment (AHVA)	• 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing. • 30% London Affordable Rent & 70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing.
Social Infrastructure Needs Study	• 1 primary school • 1 secondary school • 1 health hub • Expansions to Central Middlesex Hospital and Hammersmith Hospital • 4 supernurseries • 2 community hubs • 2 sports centres
Sports Courts and Swimming Pools Study	• Identifies that LBHF is currently reasonably well served by swimming pools but there is an under-provision of sports courts. • As the population grows, there will be increased pressure on swimming pools and the under-provision of sports courts will be further exacerbated. • Identifies that the Old Oak and Park Royal area is currently deficient in access to public sports halls and swimming pools. • Identifies that population projections for the Old Oak and Park Royal area are likely to give rise to a need for approximately 13 sports courts and two 12x25m swimming pools, or 1 sports court per 3,000 residents and 1sqm of swimming pool space for every 90 residents.
Development Infrastructure Funding Study	• There is a need for over £1.5billion infrastructure to support development in Old Oak.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Strategic Housing	• There is a high need for	• SHMA does not take account of the

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Market Assessment (SHMA)	family sized housing (50%) across all tenures.	high density flatted typology which is not appropriate for high levels of family housing as many units would not have access to acceptable private or communal amenity space or other amenities. These units would unlikely be attractive to families with children. Family housing units may also be unaffordable, particularly in the intermediate sector. There is also an impact, identified in the AHVA that it impacts on the viability of delivering 50% affordable housing.

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SP5 – Resilient Economy

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	Planning should proactively drive and support sustainable economic development to deliver the … business and industrial units … that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.
19	Significant weight should be placed on the need to support economic growth through the planning system
20	To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.
21	Local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver the jobs needed in the area.

National Planning Practice Guidance (NPPG)

Paragraph Reference	Paragraph
https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment	Housing and economic land availability assessment

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
2.16	A The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than sub-regional importance (see para 2.77) by: d) improving Londoners' access to new employment opportunities.

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	D In LDFs, boroughs should identify SILs on proposals maps and develop local policies based on clear and robust assessments of need to protect their function, to enhance their attractiveness and competitiveness for industrial type activities including access improvements.
2.17	A The Mayor will, and boroughs and other stakeholders should, promote, manage and, where appropriate, protect the strategic industrial locations (SILs) designated in Annex 3 and illustrated in Map 2.7, as London's main reservoirs of industrial and related capacity, including general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions.
4.1	A The Mayor will work with partners to: a1) promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors c) support and promote outer London as an attractive location for national government as well as businesses, giving access to the highly-skilled London workforce, relatively affordable work space and the competitive advantages of the wider London economy
4.12	A. Working with strategic partners, principally the London Enterprise Partnership, the Mayor will provide the spatial context to co-ordinate the range of national and local initiatives necessary to improve employment opportunities for Londoners, to remove barriers to employment and progression and to tackle low participation in the labour market. B. Strategic development proposals should support local employment, skills development and training opportunities.

Draft New London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
GG5	Growing a good economy To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must: A Promote the strength and potential of the wider city region. B Seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London. C Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration. D Ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth. E Ensure that London continues to provide leadership in innovation,

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	research, policy and ideas, supporting its role as an international incubator and centre for learning. F Promote and support London's rich heritage and cultural assets, and its role as a 24-hour city. G Maximise London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.

Supplementary Planning Guidance (SPG)

Policy / paragraph reference	**Policy and paragraph text**
Town Centres SPG SPG Implementation 1.2 SPG Implementation 1.3	Boroughs and town centre partners are encouraged to: c) support the development of London's creative industries in town centres g) promote an attractive business environment as part of a broader mix of uses, with a sensitive approach to car parking Boroughs and town centre partners are encouraged to: b) adopt a proactive approach to office development where increased economic potential can be clearly identified, focusing demand on the most viable and competitive business locations, having regard to authoritative, strategic and local evidence of sustained demand for office-based activities, viability, local transport capacity and townscape considerations
Land for industry and transport SPG (2012)	
SPG 3	In implementing London Plan Policies 2.17 and 4.4, the Mayor will and TfL, boroughs and other partners should: (i) adopt a positive 'plan-monitor-manage' approach to planning for industrial land in London to bring demand and supply into closer harmony; (ii) undertake regular integrated strategic and local assessments of the quantitative and qualitative supply and demand for industrial land having regard to the range of industrial type activities indicated in paragraph 2.1 of this SPG to inform the retention of industrial land in DPDs and the release of surplus capacity to other uses. These assessments should be integrated with assessments of housing capacity and need for new waste facilities, utilities and land for transport; (iii) take into account the broad phasing and sub-regional distribution of the London-wide monitoring benchmark for industrial land release set out in Table 3.1; (iv) take account, when developing borough benchmarks, site specific allocations and policies in DPDs, of the qualitative borough categorisations for Restricted, Limited and Managed transfer of industrial land to other uses in Table 3.2 and Figure 3.2, and the indicative monitoring release benchmarks outlined for boroughs in Annex 1; (v) take a proactive, plan-led approach having regard to the monitoring release benchmarks, to retain the best quality industrial sites and to manage the transfer of the poorest quality sites that are surplus to requirements through DPD site re-allocations whilst maintaining an allowance for some further transfers to take place during the plan period through the development management process;

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	(vi) test the cumulative impact of transfers against the borough benchmarks, including planned transfers of designated sites in DPDs and transfers of non-designated industrial land through the development management process including those agreed in principle in pre-application discussions; (vii) consider in light of strategic and local assessments the potential to consolidate and intensify industrial uses in appropriate locations and establish effective re-location arrangements in the context of national and regional policy. The GLA group will work with boroughs and other stakeholders to coordinate this process as it affects SILs; (viii) coordinate changes to the SILs so that these can be considered in a future review of the London Plan and where appropriate, develop frameworks including OAPFs to manage the release of land and inform detailed reviews of SIL boundaries through the DPD process; (ix) ensure that sites released from industrial use meet strategic as well as local needs. The priority should be to meet the need for housing, including affordable housing, and appropriate mixed development. Increasing capacity for social infrastructure and town centre related development will also be important in appropriate locations; (x) monitor industrial land and policy development benchmarks having regard to those indicators set out in paragraph 3.33 of this SPG and coordinate this on a London-wide and sub-regional basis. The spatial expression of this guidance is that: (xii) industrial land in Strategic Industrial Locations and strategically recognised Locally Significant Industrial Sites should in general be protected, subject to guidance elsewhere in this SPG. In parts of the East and North sub-regions there is particular scope for structured release of some SILs. In line with the London Plan these should be planned and coordinated in collaboration with boroughs and other partners through the London Plan, Opportunity Area Planning Frameworks where appropriate, and detailed boundaries identified in DPDs; (xiii) release of industrial land through development management should generally be focussed on smaller sites outside the SIL framework; (xiv) in outer London, boroughs should manage and improve the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace; (xv) boroughs are urged to work with the GLA and other stakeholders to develop and implement policies, planning frameworks and other investment tools to realise the full potential of the Strategic Outer London Development Centres (SOLDCs) with economic functions of greater than sub-regional importance in logistics, industry and green enterprise; (xvi) there is need for partnership working to see that adequate provision in inner London is sustained, and where necessary enhanced, to meet the distinct demands of the Central Activities Zone for locally accessible, industrial type activities.
SPG 4	Strategic Industrial Locations: In implementing London Plan Policies 2.17 and 4.4, the Mayor will and TfL, boroughs and others partners should: (i) promote the SILs as the main strategic reservoir for industrial and related activity in London; (ii) assess the quality of industrial land within SILs in Employment Land Reviews taking into account strategic and local factors (see paragraphs 4.14 to 4.16 of this SPG) to inform strategies for planning, investment,

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	improvement and development; (iii) define the detailed boundaries of London Plan SILs in DPDs and associated Proposals Maps taking into account strategic and local assessments, Employment Land Reviews and relevant Opportunity Area Planning Frameworks; (iv) identify the components of the SIL framework (namely the Preferred Industrial Locations and Industrial Business Parks) in strategies, DPDs and other plans; (v) manage the differing offers of PILs and IBPs through coordinated investment, regeneration initiatives, transport and environmental improvements and the use of planning agreements, and provide local planning guidelines to meet the needs of different types of industry appropriate to each having regard to paragraph 4.5;
SPG 5	In implementing London Plan policies the Mayor will and boroughs, the LDA, TfL and other partners should: (i) take particular account of the need for logistics provision in the market areas outlined in paragraph 5.13 and especially in outer East, North and West London; (ii) encourage logistics and distribution facilities which will promote the movement of goods including waste and aggregates by water or rail; (iii) ensure that provision is made for large scale distribution activities and urban consolidation centres in the light of local and strategic assessments of demand, particularly in environmentally acceptable Preferred Industrial Locations with good access to the strategic road network, existing and potential inter-modal rail freight (see Section 13), river and/or canal related facilities including wharves (see Section 22); (iv) accommodate smaller scale logistics, warehouse and storage facilities within SILs and LSIS in line with strategic road capacity. Provision on industrial sites outside the SILs should not compromise the local environment, access or road capacity or broader concerns to secure intensification at appropriate locations; (v) in accordance with London Plan policy 6.14, developments that are likely to generate high numbers of freight movements should be located close to major transport routes and make use of rail and water freight opportunities wherever possible. Appropriate loading and unloading facilities should be provided to reduce impacts on the highway; (vii) consider whether all or parts of SILs and LSIS, where there are existing or potential opportunities for sustainable modes of distribution, should be formally promoted as Logistics Parks.
SPG 9	In implementing London Plan Policies 2.17 and 4.4 the Mayor will and TfL, boroughs and others partners should: (i) consider through strategic and local demand and supply assessments and DPDs whether industrial areas that have, or will have, good public transport accessibility, especially those within or on the edge of town centres, would be appropriate for higher density, mixed-use redevelopment. This redevelopment should be consistent with London Plan policy 4.4Aa and must not compromise the offer of wider areas as competitive locations for industry, logistics, transport, utilities or waste management; (ii) where this affects SILs this consolidation should be managed sensitively using the process set out in London Plan Policy 2.17 and SPG3. Consolidation through this process should be focused on the periphery of SILs near to public transport nodes or town centres, especially where there is a barrier separating the area from the rest of the SIL and enable consolidation of more environmentally sensitive, existing PIL

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	tenants while maintaining the integrity of a local business cluster; (iii) establish robust and sensitive industrial relocation arrangements to support redevelopment where necessary.
SPG 10	In implementing London Plan policies, the Mayor will and boroughs, TfL and other partners should: (i) ensure that development of land in, and provision and refurbishing of premises for, industrial and related uses contribute to strategic climate change mitigation and adaptation objectives (see Sustainable Design and Construction SPG); (ii) encourage the redevelopment of London's industrial areas to enhance their offer as competitive locations attractive to modern industry; (iv) seek imaginative, sensitive design and investment solutions which do not entail a net loss of industrial capacity, which make more efficient use of space and enhance the environment within and around industrial areas; (v) take into account the industrial design guidance set out in paragraphs 10.13 to 10.22; (vi) provide on site provision for the particular operational requirements of heavy goods vehicles, including sufficient turning space, capacity to accommodate more goods vehicles than generally anticipated, 'parking up' space, rest space facilities, work force parking, improved linkages between local and strategic roads and the particular issues facing older industrial areas; (vii) consider how planning agreements might be used in light of local circumstances to secure London Plan objectives, including premises for different types of industrial occupier, transport, training, e-related and other infrastructure, contributions towards site assembly and decontamination and meeting the needs of specialist industries; (viii) make provision for demand for 'bad neighbour' industrial uses in environmentally acceptable locations, normally within PILs, and through good design ensure that they do not compromise the viability of other activities or the regeneration potential of the wider area; (ix) promote access to employment and target skills investment taking into account the London Employment Action Plan and the London Skills and Employment Board (LSEB) Strategy.
SPG 11	In implementing London Plan policies, the Mayor will and boroughs, TfL and other partners should: (i) manage the stock of industrial premises so that it provides a competitive offer for different types of occupier including logistics, utilities, waste management, transport functions and other related industrial activities. This will entail both improving the quality of provision to meet users' different needs, including those of SMEs and clusters of related activities, and maintaining lower cost capacity or making provision for those requiring affordable business premises to meet local needs; (ii) protect industrial sites and premises which meet demonstrable demand for lower cost industrial accommodation; (iii) promote the provision of small industrial units and managed workspaces suitable for small and medium sized enterprises (SMEs) and start-up companies;

Local Plan Regulation 18 Draft Policy Options

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Policy / paragraph reference	Policy and paragraph text
	No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Homes and jobs targets: Question the homes and jobs targets in the Local Plan. Some consultees consider that the figures should be higher, whereas others suggest that the figures should be lower. Request that further work should be undertaken to assess whether the London Plan targets are appropriate and provide justification for why the densities proposed within the Development Capacity Study are appropriate	Hammersmith and Fulham Council, Ealing Council, TITRA, Diocese of London, Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, the Hammersmith Society, Wells House Road Resident's Association, London Sustainable Development Commission, MP for Hammersmith, 4 local residents	No change proposed. The OPDC Local Plan is required to be general conformity with the London Plan and the minimum housing targets for Old Oak and Park Royal. Further work has been undertaken as part of OPDC's Development Capacity Study to test the appropriateness of housing targets in the Local Plan. The Development Capacity Study has been undertaken in accordance with national policy guidance. The Development Capacity Study work has informed the revised targets in the Regulation 19 draft Local Plan. The acceptability of any specific development proposal would be judged against the policies in the Local Plan, which includes policies which ensure that design is of a high quality and is in accordance with the principles of sustainable development.
Homes vs Jobs: Too many jobs are proposed and not enough homes	3 local residents	No change proposed. There is a need for the OPDC Local Plan to be in general conformity with the London Plan, which identifies the need to deliver a minimum 25,500 homes and 65,000

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		jobs in the OPDC area. OPDC considers that the homes and jobs figures to strike the right balance between the need for homes and jobs in the area. The level of transport access and the sites' location make Old Oak and Park Royal an excellent future employment location. This will help London's global competitiveness. This mix of employment and homes will also help create a mixed community. Employment provision is being further tested through OPDC's Future Growth Sectors Study, which will inform the next draft Local Plan.
Release more industrial land: Stakeholders suggested that OPDC should look to release more strategic industrial land in Park Royal (particularly on the HS2 work sites and at Willesden bus garage) for housing in order to allow for lower densities in Old Oak and to ensure that industrial uses' impacts on existing residential areas are minimised. Stakeholders also suggested that OPDC should take a less fixed, more blurred approach to land use zonings, allowing residential uses in industrial areas and vice versa	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, Wells House Road Resident's Association, 6 local residents	No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Officers consider that taking a more blurred approach to land uses in Park Royal would result in rapid land

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		value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. Officers support the potential for a mix of land uses in Old Oak and this is already reflected within the draft Local Plan's strategic policies.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Approximately 40,400 new jobs can be delivered during the 20 year plan period.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. There are opportunities to retain, strengthen and diversify these sectors. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Placemaking • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support;

	supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. • Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations.
Industrial Land Review	**Protect** • Protect industrial uses in Park Royal SIL • Reduce non-conforming uses in Park Royal SIL • Return Park Royal HS2 construction sites to SIL • Development adjacent to Park Royal SIL **Intensify** • Efficient use of industrial land • Reduce road congestion • Intensification pilot projects **Expand** • Adjust Park Royal SIL boundary • Light industrial floor space in Old Oak • Manage industrial floorspace within the region • Industrial space design and planning guidance **Support** • Business relocation • Low carbon transition • Local procurement • Business listing and online forum
Park Royal Atlas	There are a diverse range of businesses in the area • At the time of the survey, 19,934 active workspaces were identified. • A broad range of business sectors were identified, including breweries, bakeries, metal workshops, storage, contractors, joiners, hospitals, schools, publishers, film studios, software developers, garages, car sales, pubs, hotels, jewellers, cobblers, lawyers, accountants, spice merchants, medical suppliers, churches and artist studios. • 30% of workplaces are small office type spaces, though workplaces in large warehouses make up 63% of the total floor area. • The central areas of Park Royal stand out for having the greatest diversity of buildings and space types. Many of these are used by micro businesses which count for 75% of workplaces
Park Royal Intensification Study	There are a number of sites and locations across Park Royal where there may be opportunities for intensification, including through: • Vertical extension • Horizontal extension • Infill • Internal subdivision • New provision on vacant land • Comprehensive redevelopment
Industrial Estate Study	Recommendations for how Park Royal can improve its competitive position, including: • protecting industrial land;

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	• ensuring a greater diversity of unit sizes; • addressing infrastructure issues; and • improving access to amenities.
Park Royal Workforce Skills Analysis	The Park Royal Workforce Skills Analysis identifies that there are some slightly larger firms employing 10-49 people which are experiencing employee training/skills problems. For them it seems to be low and intermediate skills that are the issue rather than (as might have been expected) high-level skills. There are some reasons for thinking this may get worse in the years to come. These range from a rapidly rising minimum wage to the increasing buoyancy of the London jobs market, and even rising house prices making it harder for lower-skilled people to live in the boroughs around Park Royal. There are also concerns about a lack of suitable people applying for apprenticeships, and low demand from young people for these and other employment opportunities offered by employers at the site. Given that more survey respondents were thinking about employing apprentices in the future than currently employ them, this too may become a more pressing issue in future years. The findings suggest there are inefficiencies in the labour market which could perhaps be addressed. Anecdotal evidence from the consultations (as well as the survey responses) indicated that those firms that were experiencing recruitment difficulties were looking to connect with colleges and schools but had little idea of the best way of going about it, and were falling back on pre-existing relationships with independent training providers of industry- and job-specific training. Meanwhile the colleges were struggling to engage small businesses with disparate technical skills development needs and difficulties attracting young people to entry-level and apprenticeship opportunities. This suggests there may be opportunities for colleges and/or external providers to discuss training needs with employers, perhaps through some kind of brokering service.
OPDC Socio-Economic Baseline	The report does not make recommendation as it is a baseline assessment of current socio-economic conditions. The indicators outlined in the study are intended to be measured on an ongoing basis to measure improvements in socio-economic conditions.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
n/a	**n/a**	**n/a**

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Policy SP6: Places and Destinations

Legislation, Policy and Guidance Context

National Planning Policy Framework (NPPF)

Paragraph Reference	Paragraph
17	Planning should take account of the different roles and character of different areas, promoting the vitality of our main urban areas.
23	Local planning authorities should define a network and hierarchy of centres that is resilient to anticipated future economic changes.
37	Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
58	Planning policies and decisions should aim to ensure that developments establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver • the provision of retail, leisure and other commercial development • the provision of health, security, community and cultural infrastructure and other local facilities

National Planning Practice Guidance (NPPG)

Design

Paragraph Reference	Paragraph
020	Distinctiveness is what often makes a place special and valued. It relies on physical aspects such as: • the local pattern of street blocks and plots; • building forms; • details and materials; • style and vernacular; • landform and gardens, parks, trees and plants; and • wildlife habitats and micro-climates. Distinctiveness is not solely about the built environment – it also reflects

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	an area's function, history, culture and its potential need for change.

Ensuring the vitality of town centres

Paragraph Reference	Paragraph
001	Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.

London Plan (2016) Policies

Policy and paragraph reference	Policy and paragraph text
2.15	B Changes to the network including designation of new centres or extension of existing ones where appropriate, should be co-ordinated strategically with relevant planning authorities including those outside London. Identified deficiencies in the network of town centres can be addressed by promoting centres to function at a higher level in the hierarchy or by designating new centres where necessary, giving particular priority to areas with particular needs for regeneration (see Policy 2.14) and better access to services, facilities and employment. Centres with persistent problems of decline may be reclassified at a lower level. D Boroughs should: a2) in light of local and strategic capacity requirements (Policy 4.7), identify town centre boundaries, primary shopping areas, primary and secondary frontages in LDF proposals maps and set out policies for each type of area in the context of Map 2.6 and Annex 2 b) in co-ordination with neighbouring authorities and the Mayor, relate the existing and planned roles of individual centres to the network as a whole to achieve its broader objectives
4.6	C In preparing LDFs, boroughs should: c) designate and develop cultural quarters to accommodate new arts, cultural and leisure activities, enabling them to contribute more effectively to regeneration
4.7	C In preparing LDFs, boroughs should: c) take a proactive partnership approach to identify capacity and bring forward development within or, where appropriate, on the edge of town centres
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon

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	Network, where that character should be sustained, protected and enhanced through managed change.

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG2	Making the best use of land To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites. B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach. C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character. D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening. E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth. F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance
SD6	Town centres A London's varied town centres and their vitality and viability should be promoted and enhanced as: 1) strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development 2) locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment and complementing local character and heritage assets 3) the structure for delivering sustainable access by walking, cycling and public transport to a competitive range of services and activities 4) the main focus for Londoners' sense of place and local identity in the capital 5) the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy 6) a key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management. B The adaptation and restructuring of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including

	improved management of servicing and deliveries. C The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable. D The particular suitability of town centres for smaller households, Build to Rent, older people's housing and student accommodation should be considered and encouraged. E The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see Policy E1 Offices) and the need for affordable business space (Policy E3 Affordable workspace). F The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity. G Tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted (see Policy E10 Visitor infrastructure). H The delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, seating and public toilets. I The provision of social infrastructure should be enhanced, and facilities should be located in places that maximise footfall to surrounding town centre uses. J Safety and security should be improved, and active street frontages should be secured in new development, including where there are ground floor residential frontages. C The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable. D The particular suitability of town centres for smaller households, Build to Rent, older people's housing and student accommodation should be considered and encouraged. E The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see Policy E1 Offices) and the need for affordable business space (Policy E3 Affordable workspace). F The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having

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	regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity. G Tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted (see Policy E10 Visitor infrastructure). H The delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, seating and public toilets. I The provision of social infrastructure should be enhanced, and facilities should be located in places that maximise footfall to surrounding town centre uses. J Safety and security should be improved, and active street frontages should be secured in new development, including where there are ground floor residential frontages.
SD7	Town centre network A The changing roles of town centres should be proactively managed in relation to the town centre network as a whole (see Figure 2.17 and Annex 1). This process should support sustainable economic growth across the Greater London boundary to enhance the vitality and viability of London's centres and complement those in the Wider South East. B Identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level in the network, designating new centres (see Annex 1) or reassessing town centre boundaries (see Policy SD8 Town centres: development principles and Development Plan Documents). Centres with current or projected declining demand for commercial, particularly retail, floorspace may be reclassified at a lower level in the hierarchy. C The classification of International, Metropolitan and Major town centres (see Annex 1) can only be changed through the London Plan. Potential future changes to the strategic town centre network are set out in Figure A1.1 in Annex 1. Changes to District, Local and Neighbourhood centres can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate (see Policy SD8 Town centres: development principles and Development Plan Documents). D International, Metropolitan and Major town centres should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high quality environment. E District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment. F Local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis. G Boroughs and other stakeholders should have regard to the broad policy guidelines for individual town centres in Annex 1 including:

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	1) indicative growth potential (commercial and residential) 2) centres associated with the Areas for Regeneration (see Policy SD10 Strategic and local regeneration) 3) night-time economy roles (see Policy HC6 Supporting the night-time economy) 4) viable office locations including those with strategic office development potential and/or need to retain existing office functions in light of office to residential permitted development rights (see Policy E1 Offices).
D1	London's form and characteristics Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10)facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
HC6	Supporting the night-time economy A Boroughs should develop a vision for the night-time economy, supporting its growth and diversification, in particular within strategic areas of nighttime

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	activity (see Table A1.1 and Figure 7.7), building on the Mayor's Vision for London as a 24-Hour City. B In Development Plans, town centre strategies and planning decisions, boroughs should: 1) promote the night-time economy, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available 2) improve inclusive access and safety, and make the public realm welcoming for all night-time economy users and workers 3) diversify the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums 4) address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts for residents, and seek ways to diversify and manage these areas 5) ensure night-time economy venues are well-served with safe and convenient night-time transport 6) protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues. C Promoting management of the night-time economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services should be supported. Boroughs should work closely with stakeholders such as the police, local businesses, patrons, workers and residents.

Supplementary Planning Guidance (SPG)

Policy and paragraph reference	**Policy and paragraph text**
Town Centres SPG (2014) SPG implementation 1.2	Boroughs and town centre partners are encouraged to: a) encourage the integration of culture, creativity and good design into the built environment, having regard to those areas deficient in cultural provision and drawing on best practice across the capital d) develop and promote clusters of cultural activities and related uses as cultural quarters, particularly to support regeneration
SPG Implementation 6.4	Boroughs and town centre partners are encouraged to: a) ensure development complements other parts of the town centre network including coordination with the wider city region b) develop integrated policies across the London boundary to promote spatially balanced and sustainable economic growth to support the vitality and viability of London's centres and those in the wider south east c) ensure that London's town centres play an important role in the development and regeneration of the London Plan Growth Areas and Coordination corridors.
Culture and Night-Time	Sets out information to: • to provide guidance on using London Plan polices to protect and

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Economy (November 2017)	enhance cultural venues • a focus on how to offer more protection for pubs and explaining the 'Agent of Change' principle • promoting the night-time economy and night-time cultural offer whilst achieving a balance with the needs of local residents • making culture and the night-time economy more inclusive and accessible • looking at ways to manage the impacts of the night-time economy

Local Plan Regulation 18 Draft Policy Options

Policy	Paragraph
TC2	**1. Identify Old Oak High Street as a Metropolitan Centre.** 9.21 This option would provide the opportunity to increase the scale of town centre uses in the Old Oak area. This option would have benefits in terms of making Old Oak an attractive destination and could have benefits for placemaking by attracting higher footfall. However, this option could impact on the vitality and viability of the surrounding town centre hierarchy. It may also dilute investment in other centres and could also impact on a wider catchment and a greater number of town centres in west London. The greater quantum of retail on Old Oak High Street could also make it more difficult to let space. 9.22 Examples of other 'metropolitan' town centres in London are Ealing, Shepherd's Bush and Kingston. **2. Two centres are designated in Old Oak - a District Centre to the north of the canal and a Neighbourhood** **Centre around Old Oak Common Station.** 9.23 This option would limit the quantum of town centre uses to look to minimise impacts on nearby town centres such as Harlesden, Ealing and Shepherd's Bush. However, this approach would not provide sufficient floorspace to cater for the needs arising from development. The London Plan explains that typically District Centres contain 10,000-50,000sqm retail, leisure and service floorspace and that Neighbourhood Centres, would by virtue, be at either the lower end of this range or below 10,000sqm. The Retail and Leisure Needs Study identifies a quantitative need for 52,500sqm of A-class floorspace alone in Old Oak during the plan period and consequently, designating a District Centre and Neighbourhood Centre would be likely to only provide sufficient floorspace to provide for retail needs and would not allow for the provision of a significant quantum of culture, sports or leisure uses within these centres. The approach of designating a Neighbourhood Centre around the Old Oak Common Station would also fail to capture the catalytic impact that the station could have on the immediate area and wider hinterland. The Old Oak Common Station is estimated to have approximately 250,000 passengers a day interchanging (embarking or disembarking). There is a significant opportunity for the land uses around the Old Oak Common Station to attract these passengers who are interchanging into the surrounding hinterland and to help activate the place and capture economic benefits for the area and its hinterland and this opportunity would be limited through the designation of a Neighbourhood Centre here, rather than a Major Centre. 9.24 Examples of other District Centres in the area are Harlesden, Hanwell and Portobello Road and examples of other 'neighbourhood' centres in the

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	area are East Acton, Kensal Rise and Perivale. **3. Two centres are designated in Old Oak - a District Centre to the south of the canal around Old Oak Common Station and a Neighbourhood Centre to the north of the canal.** 9.25 As with option 2 above, this option would seek to limit the quantum of town centre uses to minimise impacts on nearby town centres. As above, it is unlikely that a district and neighbourhood centre would provide sufficient floorspace to cater for the needs of development and certainly would not provide a policy framework for the establishment of strategic culture, sports and leisure uses in the area. 9.26 The designation of a district centre to the south of the Grand Union Canal would better capture the scale of need for town centre uses arising from the population living, working and visiting the area than in option 2. However, to the north of the canal, the designation of a Neighbourhood Centre would not be capable of providing sufficient town centre uses to meet the areas need. This could be met to a certain degree by the District Centre at Old Oak Common Station and the District Centre at Harlesden, but there would also be a risk that premises in this area would struggle and the limited quantum of town centre uses may impact on placemaking. **4. Park Royal is not identified as a Neighbourhood Centre and a different approach is taken to town centre uses in the area.** 9.27 The town centre uses in the centre of Park Royal, in particular the ASDA supermarket, generate significant volumes of traffic which have an impact on the ability of Park Royal to function as an industrial estate. An approach to minimise this impact might be to dedesignate the centre and allow for its gradual erosion to other uses such as employment and residential including local 'walk to' services. However, this approach could also result in worse impacts on the highway network if the town centre uses are dispersed requiring employees and residents to travel further for their services. It would also see the loss of well used existing local services over time.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
New Places: Suggestions for the Local Plan to include new places including: - A separate place for Willesden Junction station; - A separate place for Victoria Road/Old Oak Lane - Splitting Park Royal into two places - Identifying Harlesden Town Centre as a separate place - A separate place for Old Oak Common	Diocese of London, Old Oak Park (DP9), The Hammersmith Society, TITRA, Wells House Road Resident's Association, Midland Terrace Resident's Group, Old Oak Interim Forum, 9 local residents	Change proposed. OPDC recognises the need to have a more nuanced approach to Places. OPDC agrees with the suggestion to have a separate place for Willesden Junction. This has been included in the Regulation 19 draft (P11) OPDC agrees with the rationale to have a separate place drawing together the communities along Old Oak Lane, Old Oak Common

station A separate place for the IEP depot		Lane and part of Victoria Road. This has been identified as a separate place in the Regulation 19 draft (P8) OPDC recognises the diversity within Park Royal industrial area and officers have undertaken further evidence work, which is considering the spatial characteristics of this area. OPDC has produced a Heritage Strategy, which identifies heritage assets and ways in which these can help shape the future of Old Oak and Park Royal. OPDC has also produced a Future Growth Sectors Study to gather further information on the nature of the local economy and future opportunities. This has resulted in a more nuanced approach in Park Royal, which has now been split into two places – Park Royal West (P4) for the newer more logistics/storage orientated part of the estate, and Old Park Royal (P5) for the older part of the estate where industrial uses are finer grain and more mixed. Harlesden Town Centre is not within the OPDC area, so OPDC is unable to set a place policy for it; however, OPDC is working closely with Brent Council and the Harlesden Neighbourhood Forum to consider how development at Old Oak and Harlesden can complement each other. OPDC recognises the need for more detailed policy guidance for Old Oak Common station and to address this, the station has been identified as a 'cluster'.

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		OPDC does not propose to include a separate place for the IEP depot. Whilst the future redevelopment of the IEP depot site for a mixed use development may be supported in land use policy terms, given the nature of the existing use as the depot, it is not identified as a phase likely to come forward within the timescales of the Local Plan.
Meanwhile Uses: There was support for requiring developers to submit a meanwhile strategy, but that the Local Plan should set a threshold for the size of schemes required to submit one	Brent Council, Old Oak Park (DP9), Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, Diocese of London, Old Oak Park (DP9), TITRA, London Sustainable Development Commission, 2 local residents	Change proposed. The revised Local Plan (policy TCC9) requires a meanwhile feasibility studies to be submitted by major development proposals (10 or more residential units or 1000sqm+ of non-residential floorspace). If meanwhile uses are feasible, then the policy requires the submission of a meanwhile strategy.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Relevant recommendations
Retail and Leisure Needs Study (and Addendums)	• There is a deficiency of cultural space in West London and the OPDC area could help address this through the delivery of a new cultural quarter (paras 7.2.4 and 7.2.8) • There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years). • A new town centre hierarchy is identified: - A new major town centre at Old Oak High Street; - A new neighbourhood town centre at North Acton; - A new neighbourhood town centre at Atlas Junction; and

	- Consolidating and expanding the existing neighbourhood town centre at Park Royal Centre. • Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.
Catalyst Uses Study	• Catalyst uses could be small or large, but OPDC should look to set a threshold for the application of planning policy criteria of either in excess of 10,000sqm and/or 0.25 hectares of land • The review of case studies identifies both positives and negatives for catalyst uses. The study identifies that rather than one catalyst, a series of multiple, complementary catalysts are likely to best support the wider regeneration aspirations of the area. • The study identifies a series of planning criteria against which applications should be assessed. These are structured around five overarching objectives for any catalyst: - To be part of a holistic offer; - To be financially sustainable; - To complement the wider environment; - To help generate momentum; and • To leverage HS2 and Crossrail.
Cultural principles	• Ensure the Local Plan highlights the importance of culture to the area. • Ensure that character, heritage and culture sit at the heart of placemaking. • Develop a Cultural Strategy to further consider opportunities for culture in the OPDC area. • Ensure that consultation is meaningful, that it reaches as many people and communities as possible, and that it includes young people and families. • Encourage 'anchor' tenants and cultural institutions to locate in the area, and explore options for attracting and retaining creative businesses and affordable workspace

Rationale for any non-implemented recommendations

Evidence base	Recommendation	Rationale for not including
Retail and Leisure Needs Study	Potential designation of a district centre and neighbourhood centre in Old Oak, instead of a major town centre	The rationale for proposing a major town centre is outlined in para 7.6.11 in the Retail and Leisure Needs Study. Officers propose to continue to identify Old Oak High Street as a potential major town centre. The draft Retail and Leisure Needs Study identifies the need in the centre to provide over 50,000sqm of A-class uses alone, which puts it within the Major Town Centre bracket in Annex 2 of the London Plan. This does not account for the floorspace requirements for culture, sports, leisure and community uses falling within use class D1 and D2. The Retail and Leisure Needs Study (para 7.6.11) also

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		identifies that the designation of a major town centre will also: - Meet a gap in major centre provision in the area and provide a distinct offer from other centres in the hierarchy - Ensure that appropriate investment and occupiers for major centres are directed to the planned new centre rather than potentially incrementally throughout the remainder of the OPDC area, helping with place making objectives and creating a sense of place for a new community - provide a clear policy message on how the retail floorspace will meet the needs of the development in a sustainable manner. The Local Plan puts in place appropriate safeguards to ensure that impacts on neighbouring centres are minimised. Impact Assessments are required for schemes providing over 5,000sqm in Old Oak (see policy TCC3) and proposals are required to submit a town centre enhancement strategy (see policies P1, P2 and P11, chapter 4), where proposals are likely to have adverse impacts. However, officers agree with the need for close working with Brent Council and local community groups to ensure that Harlesden remains a successful town centre. Policy SP6 requires that the new town centre hierarchy complements the surrounding town centre network, including centres like Harlesden, Shepherd's Bush, Acton and Ealing.

Other evidence base

Supporting Study	Recommendations
	• **None**

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Policy SP7: Connecting People and Places

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Paragraph Reference	Paragraph
17	Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
29	Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.
30	Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.
31	Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development.
35	Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to ● accommodate the efficient delivery of goods and supplies; ● give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; ● create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
37	Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
41	Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.

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156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver the provision of infrastructure for transport

National Planning Practice Guidance (NPPG)

Design

Paragraph Reference	Paragraph
008	Planning policies and decisions should look to create streets that support the character and use of the area. This means considering both their role as transport routes and their importance as local public spaces to accommodate non travel activities. Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through. Attractive and well-connected permeable street networks encourage more people to walk and cycle to local destinations. For this reason streets should be designed to be functional and accessible for all, to be safe and attractive public spaces and not just respond to engineering considerations. They should reflect urban design qualities as well as traffic management considerations and should be designed to accommodate and balance a locally appropriate mix of movement and place based activities. The transport user hierarchy should be applied within all aspects of street design – consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles.

London Plan (2016) Policies

Policy and paragraph reference	Policy and paragraph text
6.1	A The Mayor will work with all relevant partners to encourage the closer integration of transport and development through the schemes and proposals shown in **Table 6.1** and by: a encouraging patterns and nodes of development that reduce the need to travel, especially by car b seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand c supporting development that generates high levels of trips at locations with high levels of public transport accessibility and/or capacity, either currently or via committed, funded improvements including, where appropriate, those provided by developers through the use of planning obligations d improving interchange between different forms of transport, particularly around major rail and Underground stations, especially where this will enhance connectivity in outer London

	e seeking to increase the use of the Blue Ribbon Network, especially the Thames, for passenger and freight use f facilitating the efficient distribution of freight whilst minimising its impacts on the transport network g supporting measures that encourage shifts to more sustainable modes and appropriate demand management h promoting greater use of low carbon technology so that carbon dioxide and other contributors to global warming are reduced i promoting walking by ensuring an improved urban realm B The Mayor will, and boroughs should, take an approach to the management of streetspace that takes account of the different roles of roads for neighbourhoods and road users in ways that support the policies in this Plan promoting public transport and other sustainable means of transport (including policies **6.2**, **6.7**, **6.9** and **6.10**) and a high quality public realm. Where appropriate, a corridor-based approach should be taken to ensure the needs of street users and improvements to the public realm are co-ordinated.
6.2	C Boroughs and any other relevant partners must ensure the provision of sufficient land, suitably located, for the development of an expanded transport system to serve London's needs by: a safeguarding in DPDs existing land used for transport or support functions unless alternative facilities are provided that enables existing transport operations to be maintained b identifying and safeguarding in DPDs sites, land and route alignments to implement transport proposals that have a reasonable prospect of provision, including those identified in **Table 6.1**.
6.3	D Boroughs should take the lead in exploiting opportunities for development in areas where appropriate transport accessibility and capacity exist or is being introduced. Boroughs should facilitate opportunities to integrate major transport proposals with development in a way that supports London Plan priorities.
6.11	B DPDs should develop an integrated package of measures drawn from the following: a promoting local services and e-services to reduce the need to travel b improving the extent and quality of pedestrian and cycling routes c making greater use of the Blue Ribbon Network d improving the extent and quality of public transport e developing intelligent transport systems to convey information to transport users i applying the London street-types framework to ensure that the needs of street users and improvements to the public realm are dealt with in a co-ordinated way j promoting efficient and sustainable arrangements for the transportation and delivery of freight.

6.12	B In assessing proposals for increasing road capacity, including new roads, the following criteria should be taken into account: a the contribution to London's sustainable development and regeneration including improved connectivity b the extent of any additional traffic and any effects it may have on the locality, and the extent to which congestion is reduced c how net benefit to London's environment can be provided d how conditions for pedestrians, cyclists, public transport users, freight and local residents can be improved e how safety for all is improved. C Proposals should show, overall, a net benefit across these criteria when taken as a whole. All proposals must show how any dis-benefits will be mitigated.
6.14	B Development proposals that: c increase the use of the Blue Ribbon Network for freight transport will be encouraged.
7.1	B Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure
7.27	A Development proposals should enhance the use of the Blue Ribbon Network, in particular proposals: b should protect and improve existing access points to (including from land into water such as slipways and steps) or alongside the Blue Ribbon Network (including paths). New access infrastructure into and alongside the Blue Ribbon Network will be sought.
7.30	C Within LDFs boroughs should identify any local opportunities for increasing the local distinctiveness and use of their parts of the Blue Ribbon Network

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
T1	Strategic approach to transport A Development Plans and development proposals should support: 1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041 2) the proposed transport schemes set out in Table 10.1. B All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
T2	Healthy Streets A Development proposals and Development Plans should deliver patterns

	of land use that facilitate residents making shorter, regular trips by walking or cycling. B Development Plans should: 1) promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities. 2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant. C In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active and public transport travel. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators. D Development proposals should: 1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. 2) reduce the dominance of vehicles on London's streets whether stationary or moving. 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
T3	Transport capacity, connectivity and safeguarding A Development Plans should develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections. B Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by: 1) safeguarding existing land and buildings used for transport or support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary) 2) identifying and safeguarding new sites and route alignments, as well as supporting infrastructure, in order to provide transport functions and planned changes to capacity, including proposals identified in Table 10.1 3) safeguarding the Walk London Network, protecting access to and improving the Thames Path and, where relevant, improving its alignment with the Thames. C Development proposals that do not provide adequate protection for the schemes outlined in Table 10.1 or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused. D In Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the

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	Bakerloo Line Extension, river crossings and an eastwards extension of the Elizabeth Line. E Development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.

Supplementary Planning Guidance (SPG)

Policy and paragraph reference	Policy and paragraph text
	None

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Connecting communities: The policy should define how existing communities will be connected to each other and to open spaces.	Queen's Park Rangers FC, Greater London Authority, Brent Council, London Sustainable Development Commission, 3 local residents.	Change proposed. OPDC has developed a Public Realm, Walking and Cycling Strategy which is informing the Regulation 19 Local Plan and which shows how the OPDC area should be connected into its surroundings. The Local Plan is also supported by an Environmental Standards Study, which sets OPDC's standards for open space, which have been incorporated into Policy SP8 (Green Infrastructure and Open Space), the place policies (chapter 4), Policy

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		EU1 (open space) and EU2 (Urban Greening and Biodiversity). Policy SP8 requires that delivers and/or contribute towards a varied, well-designed, integrated and high quality green infrastructure and open space networks which successfully integrate with the wider green infrastructure and open space networks, including the Grand Union Canal, Wormwood Scrubs and All London Green Grid

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Bus Strategy	• Provision of additional routes and capacity enhancements • Changes to routes to enhance journey time efficiency • Phased approach to provide capacity enhancements generated by the completion of key developments
Car Parking Study	• Recommends that the residential parking policy is appropriate, and that further consideration is required for the non-residential parking policy.
Environmental Standards Study	• A minimum of 30% of the area should be set aside for high quality and multi-functional public open space including ensuring there are sufficient local parks and green spaces for play.
Infrastructure Delivery Plan	• Identifies a significant number of infrastructure requirements to support the regeneration of the area. • The majority of infrastructure identified relates to the core development area in Old Oak, but the IDP also identifies important infrastructure requirements for Park Royal • The study identifies those pieces of infrastructure which OPDC would look to secure through developer contributions (Section 106, Section 278 or Community Infrastructure Levy).
Old Oak Strategic Transport Study	• New London Overground Stations at Hythe Road and Old Oak Common Lane • Willesden Junction station improvements and bridge over WCML

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	• Potential Crossrail 1 to WCML link • Improved frequencies on London Overground • Increased bus frequencies and new routes • New highway connections • A package of highway 'quick wins' • A package of measures to improve conditions for walking and cycling • A package of demand management measures to ensure a reduced car mode share
Park Royal Transport Strategy	• Providing transport networks that enhance the communities they serve and help local business to operate and grow sustainably, both now and in the future.
Public Realm, Walking and Cycling Strategy	• The new street network at Old Oak is comprised of four key routes. These are: Old Oak High Street, Grand Union Street, Park Road and Wormwood Scrubs Street.
Old Oak North Development Framework Principles	• Deliver a viaduct for the West London Line to generate wider benefits. • Provide connections to Scrubs Lane that should be located at Park Road and Hythe Road. • Provide connections to Old Oak South via Park Road and Old Oak Street. • Delivery of a two-way cycle lane to the west of Scrubs Lane is no longer likely to be deliverable. • Within the place of Willesden Junction, Old Oak Street will continue as a walking and cycling route connecting to Station Approach in the west. To the east a new walking and cycling link will also be delivered to Harrow Road.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Public Realm, Walking and Cycling Strategy	• The new street network at Old Oak is comprised of four key routes. These are: Old Oak High Street, Grand Union Street, Park Road and Wormwood Scrubs Street.	• Key route network within Old Oak has been superseded by proposals set out in the Old Oak North Development Framework Principles

Other evidence base

Supporting Study	Recommendations
	• **None**

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SP8: Green Infrastructure and Open Space

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	Planning should contribute to conserving and enhancing the natural environment. Planning should recognise that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production).
73	Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.
74	Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: • an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or • the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or • the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.
99	Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.
109	The planning system should contribute to and enhance the natural and local environment by: • recognising the wider benefits of ecosystem services; • minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future

	pressures; • preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.
114	Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
117	To minimise impacts on biodiversity and geodiversity, planning policies should: • plan for biodiversity at a landscape-scale across local authority boundaries; • identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation; • promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan; • aim to prevent harm to geological conservation interests; and where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.
157	Crucially Local Plans should contain a clear strategy for enhancing the natural, built and historic environment.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	**Policy and paragraph text**
Air Quality	
Title: How can an impact on air quality be mitigated? **Paragraph:** 008 **Reference ID:** 32-008-20140306 **Revision Date:** 06.03.2014	Mitigation options where necessary will be locationally specific, will depend on the proposed development and should be proportionate to the likely impact. It is important therefore that local planning authorities work with applicants to consider appropriate mitigation so as to ensure the new development is appropriate for its location and unacceptable risks are prevented. Planning conditions and obligations can be used to secure mitigation where the relevant tests are met. Examples of mitigation include: Using green infrastructure, in particular trees, to absorb dust and other pollutants
Climate Change	
Title: How can adaption and mitigation approaches be integrated? **Paragraph:** 004 **Reference ID:**	When preparing Local Plans and taking planning decisions local planning authorities should pay particular attention to integrating adaptation and mitigation approaches and looking for 'win-win' solutions that will support sustainable development. This could be achieved in a variety of ways, for example through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding and help species adapt to climate change – as well as contributing to a pleasant environment which encourages people to walk and cycle.

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6-004-20140612 **Revision Date:** 12.06.2014	
Design	
Title: Planning should promote a network of greenspaces (including parks) and public places **Paragraph:** 009 **Reference ID:** 26-009-20140306 **Revision Date:** 06.03.2014	Development should promote public spaces and routes that are attractive, accessible, safe, uncluttered and work effectively for all users – including families, disabled people and elderly people. A system of open and green spaces that respect natural features and are easily accessible can be a valuable local resource and helps create successful places. A high quality landscape, including trees and semi-natural habitats where appropriate, makes an important contribution to the quality of an area. The benefit of greenspaces will be enhanced if they are integrated into a wider green network of walkways, cycleways, open spaces and natural and river corridors.
Health and Wellbeing	
Title: Health and Wellbeing **Paragraph:** 005 **Reference ID:** 53-005-20140306 **Revision Date:** 06.03.2014	A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage: • Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport.
Natural Environment	
Title Is there a statutory basis for planning to seek to minimise impacts on biodiversity and provide net gains in biodiversity where possible? **Paragraph** 007 **Reference ID:** 8-007-20140306 **Revision Date:** 06 03 2014	Yes. Section 40 of the Natural Environment and Rural Communities Act 2006, which places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant contribution to the achievement of the commitments made by government in its Biodiversity 2020 strategy. Guidance on statutory obligations concerning designated sites and protected species is published separately because its application is wider than planning and links are provided to external guidance. Local planning authorities should take a pragmatic approach – the aim should be to fulfil statutory obligations in a way that minimises delays and burdens. The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.

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Title: How can development not only protect but also enhance biodiversity? **Paragraph:** 017 **Reference ID:** 8-017-20140306 **Revision Date:** 06 03 2014	Biodiversity maintenance and enhancements through the planning system have the potential to make a significant contribution to the achievement of Biodiversity 2020 targets. Biodiversity enhancement in and around development should be led by a local understanding of ecological networks, and should seek to include: • habitat restoration, re-creation and expansion; • improved links between existing sites; • buffering of existing important sites; • new biodiversity features within development; and • securing management for long term enhancement.
Title: Why is green infrastructure important to delivering sustainable development? **Paragraph:** 028 **Reference ID:** 8-028-20160211 **Revision Date:** 11 02 2016	Green infrastructure is important to the delivery of high quality sustainable development, alongside other forms of infrastructure such as transport, energy, waste and water. Green infrastructure provides multiple benefits, notably ecosystem services, at a range of scales, derived from natural systems and processes, for the individual, for society, the economy and the environment. To ensure that these benefits are delivered, green infrastructure must be well planned, designed and maintained. Green infrastructure should, therefore, be a key consideration in both local plans and planning decisions where relevant.
Title: What is a strategic approach to green infrastructure? **Paragraph:** 029 **Reference ID:** 8-029-20160211 **Revision Date:** 11 02 2016	To assist in planning positively for green infrastructure local planning authorities may wish to prepare an authority-wide green infrastructure framework or strategy. This should be evidence-based by, for example, including an assessment of current green infrastructure provision that identifies gaps in the network and the components and opportunities for improvement. The assessment can inform the role of green infrastructure in local and neighbourhood plans, infrastructure delivery plans and Community Infrastructure Levy (CIL) schedules. Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered. This strategic approach to green infrastructure may cross administrative boundaries. Therefore neighbouring authorities, working collaboratively with other stakeholders including Local Nature Partnerships (LNPs) and Local Enterprise Partnerships (LEPs), may wish to consider how wider strategies for their areas can help address cross-boundary issues and help meet the Duty to Cooperate.
Title: How can green	Green infrastructure can help to deliver a variety of planning policies including:

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infrastructure help to deliver wider planning policy? **Paragraph:** 030 **Reference ID:** 8-030-20160211 **Revision Date:** 11 02 2016	Building a strong, competitive economy: Green infrastructure can drive economic growth and regeneration, helping to create high quality environments which are attractive to businesses and investors. Delivering a wide choice of high quality homes: Green infrastructure can help deliver quality of life and provide opportunities for recreation, social interaction and play in new and existing neighbourhoods. More broadly, green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place. Green infrastructure is also an important approach to delivering ecosystem services and ecological networks. Requiring good design: Well-designed green infrastructure helps create a sense of place by responding to, and enhancing, local landscape character. Green infrastructure can also help create safe and accessible environments in new development and the regeneration of brownfield sites in existing built up areas. Promoting healthy communities: Green infrastructure can improve public health and community wellbeing by improving environmental quality, providing opportunities for recreation and exercise and delivering mental and physical health benefits. Green infrastructure also helps reduce air pollution, noise and the impacts of extreme heat and extreme rainfall events. Meeting the challenge of climate change, flooding and coastal change: Green infrastructure can help urban, rural and coastal communities mitigate the risks associated with climate change and adapt to its impacts by storing carbon; improving drainage (including the use of sustainable drainage systems) and managing flooding and water resources; improving water quality; reducing the urban heat-island effect and; where appropriate, supporting adaptive management in coastal areas. Green infrastructure networks also help species adapt to climate change by providing opportunities for movement. Conserving and enhancing the natural environment: The components of green infrastructure exist within the wider landscape context and should enhance local landscape character and contribute to place-making. High quality networks of multifunctional green infrastructure provide a range of ecosystem services and can make a significant contribution to halting the decline in biodiversity.
Title: How should green infrastructure be planned for in the long term? **Paragraph:**	As with other forms of infrastructure, green infrastructure requires sustainable management and maintenance arrangements to be in place if it is to provide benefits and services in the long term. Arrangements for managing green infrastructure, and for funding its management over the long-term, should be identified as early as possible when planning

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031 **Reference ID:** 8-030-20160211 **Revision Date:** 11 02 2016	green infrastructure and factored into the way that it is designed and implemented.
Open Space, Sports and Recreation Facilities	
Title: How should open space be taken into account in planning? **Paragraph:** 001 **Reference ID:** 37-001-20140306 **Revision Date:** 06.03.2014	Open space should be taken into account in planning for new development and considering proposals that may affect existing open space. Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure, as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development. It is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. In carrying out this work, they should have regard to the duty to cooperate where open space serves a wider area. See guidance on Local Green Space designation, which may form part of the overall open space network within an area.

Any other relevant national guidance/policy

Policy / paragraph reference	Policy and paragraph text
N/A	N/A

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
Chapter 1:	
Policy 1.1 Delivering the Strategic Vision and Objectives for London	B Growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without: a encroaching on the Green Belt, or on London's protected open spaces
Chapter 2: London's Places	
Policy 2.18 Green	Boroughs should: a set out a strategic approach to planning positively for the creation,

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Infrastructure: the multi functional network of green and open spaces	protection, enhancement and management of networks of green infrastructure by producing green infrastructure strategies that cover all forms of green and open space and the interrelationship between these spaces. These should identify priorities for addressing deficiencies and should set out positive measures for the design and management of all forms of green and open space; Delivery of local biodiversity action plans should be linked to these strategies. b ensure that in and through DPD policies, green infrastructure needs are planned and managed to realise the current and potential value of these to communities and to support delivery of the widest range of linked environmental and social benefits; c in London's urban fringe support, through appropriate initiatives, the vision of creating and protecting an extensive and valued recreational landscape of well-connected and accessible countryside around London for both people and wildlife.
Chapter 5: London's Response to Climate Change	
Policy 5.3 Sustainable Design and Construction	C Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles: i promoting and protecting biodiversity and green infrastructure.
Policy 5.10 Urban Greening	A The Mayor will promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change. C Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping.
Chapter 7: London's Living Spaces and Places	
Policy 7.17 Metropolitan Open Land	Any alterations to the boundary of MOL should be undertaken by Boroughs through the LDF process, in consultation with the Mayor and adjoining authorities. To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria: • it contributes to the physical structure of London by being clearly distinguishable from the built up area • it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London • it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.
Policy 7.18 Protecting Open Space and Addressing	The Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency. Planning decisions

Deficiency	The loss of protected open spaces must be resisted unless equivalent or better-quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate. LDF preparation When assessing local open space needs LDFs should: • include appropriate designations and policies for the protection open space to address deficiencies • identify areas of open space deficiency, using the open space categorisation set out in Table 7.2 as a benchmark for all the different types of open space identified therein • ensure that future publically accessible open space needs are planned for in areas with the potential for substantial change such as opportunity areas, regeneration areas, intensification areas and other local areas. • ensure that open space needs are planned in accordance with green infrastructure strategies to deliver multiple benefits. Boroughs should undertake audits of all forms of open space and assessments of need1. These should be both qualitative and quantitative, and have regard to the cross-borough nature and use of many of these open spaces.
Policy 7.19 Biodiversity and access to nature	F In their LDFs, Boroughs should: b identify areas deficient in accessible wildlife sites and seek opportunities to address them e identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites

Draft New London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 1 Planning London's Future	
Policy GG2 Making the best use of land	To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.
Chapter 3 Design	
Policy D1 London's form and characteristics	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: • 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity B Development design should: • 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water
Policy D7 Public realm	Development Plans and development proposals should: H Incorporate green infrastructure into the public realm to support

	rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.
Chapter 5 Social Infrastructure	
Policy S5 Sports and recreation facilities	C Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (Policy G3 Metropolitan Open Land) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.
Chapter 8 Green infrastructure and Natural Environment	
Policy G1 Green infrastructure	A London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure B Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation. C Development Plans and Opportunity Area Planning Frameworks should: • identify key green infrastructure assets, their function and their potential function 2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
Policy G3 Metropolitan Open Land	A Metropolitan Open Land (MOL) should be protected from inappropriate development: • 1) development proposals that would harm MOL should be refused • 2) boroughs should work with partners to enhance the quality and range of uses of MOL. B The extension of MOL designations should be supported where appropriate. C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. D Boroughs should designate MOL by establishing that the land meets at least one of the following criteria: • 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area • 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London • 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.
Policy G4 Local green and open space	A Local green and open spaces should be protected. B The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.

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	C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required105. D The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary. E Development Plans and Opportunity Area Frameworks should: 1) include appropriate designations and policies for the protection of green and open space to address deficiencies 2) ensure that future green and open space needs are planned for in areas with the potential for substantial change 3) ensure that green and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.
Policy G5 Urban greening	A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. B Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.
Policy G6 Biodiversity and access to nature	A Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites. B In developing Development Plan policies, boroughs should: 1) use the relevant procedures to identify SINCs and green corridors. When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them 3) seek opportunities to create habitats that are of particular relevance and benefit in an urban context 4) include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations 5) ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed. C Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be

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	applied to minimise development impacts: 1) avoid adverse impact to the special biodiversity interest of the site 2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site 3) seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts. D Biodiversity enhancement should be considered from the start of the development process. E Proposals which create new or improved habitats that result in positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites.

Mayor's Sustainable Design and Construction SPG (2014)

Policy / paragraph reference	Policy and paragraph text
2.2.3	Through careful design, developers should ensure their schemes optimise density. The design should enable the development to sit comfortably within the local context and provide a high quality living or working environment, including the provision of amenity and open space. The delivery of sufficient housing, employment space and supporting infrastructure on existing sites will result in less pressure to development open spaces and other green or public spaces.
2.2.32 – 2.2.33	2.2.32 Where boroughs are aware of a demand for food growing space they can secure landscape designs within developments that provide flexible open spaces which may be adapted for food growing to be undertaken in the future, should there be demand from the local community. Consideration at the design stage will include: • safeguarding south facing spaces • the availability of water, incorporating rain water harvesting • the loading capacity of green roofs and balconies; • planting walls with espaliers or climbing plants; • integrating edible plants with ornamental plants; • proving planters that can be easily converted for food growing; and • management. 2.2.33 Where provided, it may be appropriate to secure (through condition or s106 agreement) the identified space for food growing, as opposed to wider open space uses.
2.8 Nature Conservation and Biodiversity	2.8.2 Developments should be sensitively designed so that there is no net loss in the quality and quantity of habitat across a development site and to enhance biodiversity and increase connectivity between patches of urban habitat. Protected species 2.8.3 Certain species are protected under UK and European legislation. Natural England provides a list of protected species as well as guidance relating to these protected species.

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	2.8.4 Certain development activities within the vicinity of protected species and their habitats require a licence from Natural England. It is the developer's responsibility establish the likelihood of the presence of any protected and priority species on their site, or within the vicinity of their site. Initial information can be identified from a local or the London wide54 records centre or a survey by a competent person may be required. The detail and length of the survey period will depend on the suspected likelihood of the presence of protected species and what the species is. The site may only be used for part of the year by a protected species. It is also the developer's responsibility to ensure that they have complied with all legislation with regards to protected species when developing their site. The protected species most likely to be encountered on development sites in London are bats, badgers, water vole, great crested newt and reptiles (grass snake, common lizard and slow-worm). Specialist advice on how to manage and protect specific species can be found on Natural England's website and from the London Wildlife Trust or from specialist conservation bodies for individual species such as the Royal Society for the Protect of Birds (RSPB), Buglife and the Bat Conservation Trust. Protected sites 2.8.5 Certain sites are protected by UK and European legislation. Sites include those designated as: • International55 - special areas of conservation (SACs), special protected areas (SPAs) and Rasmar sites; and • National - Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs). Other sites protected by land-use planning policy • London wide - sites of metropolitan importance for nature conservation; and • Local - sites of borough and local importance for nature conservation. 2.8.6 Where proposals are in the vicinity of these sites developers will have to carry out an assessment of the potential impacts the scheme could have on these sites, including the connectivity of this site with other nature conservation sites. The assessment should be commensurate to the scale of the development and the statutory or non-statutory protection afforded to the site . The assessment needs to have informed the design of the development, which should minimise impacts, including on the connectivity of green corridors. Where it is assessed there will be adverse impacts on biodiversity or the connectivity of ecological sites sufficient mitigation measures are to be incorporated into the construction and occupation stages. The assessment needs to be submitted alongside the planning application. 2.8.7 The development of land use policy documents and some large development proposals or projects will need to be informed by Appropriate Assessments under the European Union Habitats Directives if they are likely to have an impact on European sites (SACS and SPAs). This assessment is the responsibility of the determining authority . Biodiversity Action Plans 2.8.8 Developers and local planning authorities should have regard to additional species and habitats that are identified at the national, London or local level as priorities for protection and enhancement. This includes

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species which are of a particular conservation priority in London such as, for example swifts and stag beetles .

Development proposals

2.8.9 In accordance with London Plan Policy 7.19 developers should adhere to the following hierarchy when considering biodiversity on their development site:

1. avoid adverse impact to the biodiversity interest by:
- identifying the biodiversity interest within the site
- considering the particular structure of landscape or vegetation required by any important plant or animal species;
- carefully considering the location, design, form and foundation requirements for the development to protect existing biodiversity as well as the length and timing of the construction phase and the specific processes involved ; and
- considering the implications of the development on changes to the local natural environment over time, for example space required for maturing trees, the impact of additional lighting and noise.

2. minimise impact and seek mitigation, biodiversity impacts should be reduced as far as reasonably possible. This can be achieved by undertaking appropriate ecological surveys in advance of any planning application to guide and inform the design of the development (as set out in paragrapgh 2.8.4. These steps should be followed and an explanation provided with planning applications:
- give priority to retaining any existing valuable habitat, vegetation, species populations or ecological features;
- provide connectivity to existing green and nature conservation spaces by contributing to 'buffer habitat', 'stepping stones' and 'corridors; and
- provide new habitat within the development of equal or greater biodiversity value. See paragraph 2.8.11 for examples of habitat creation.

3. only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation which could include:
- provision of off-site replacement habitat; and
- provision of a financial contribution or other resources to enable adjacent land managers to improve the quality of their ecological resource.

2.8.10 Where required, an assessment needs to be submitted alongside a planning application. It should be noted that for important species or habitat, knowledge of seasonal fluctuations and dependencies may be necessary, requiring surveying effort that adequately captures a full annual cycle. Also any mitigation or compensation measures need to be identified at planning application stage and secured by condition or s106 agreement. All compensation habitat must be maintained to ensure its establishment and long term survival. Details of management and maintenance measures to be put in place are to be set out in a management plan. All biodiversity assessments and proposal for protection, mitigation and replacement should be prepared by a suitably qualified person. Developers are encouraged to provide this data to the Greenspace Information for Greater London (GIGL).

Promoting the creation of additional Habitat

2.8.11 In addition to following the hierarchy described above new habitat provision should be provided as part of a development's urban greening measures. This can include ecologically sensitive landscaping, including

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	water features or new habitat provided on buildings, such as in the form of green roofs and walls and roof gardens, ponds and wetlands potentially incorporated with SuDs and bird and bat boxes and insect habitats. Habitat provided on a building can benefit some species but cannot fully replace habitat lost at ground level. There are numerous web-sites that provide information on how to include and enhance biodiversity on development sites. See the Signpost adjacent for a few of these resources. 2.8.12 The potential to increase biodiversity in public realm improvements should be maximised. The ecological enhancement of urban greening measures in the public realm can in particular increase the connectivity between existing areas of urban habitat. The Mayor's All London Green Grid SPG identifies opportunities for improving the connectivity of green infrastructure, including the creation of corridors for nature conservation, across London .

All London Green Grid 2012 (SPG)

Policy/ paragraph reference	Policy and paragraph text
Implementation Point 4 (b)	Development and regeneration proposals should plan, locate and design new and improved green infrastructure and manage the ALGG as an interdependent, integrated and multifunctional open and green space network
Implementation Point 7	The Mayor, boroughs and other stakeholders should work in partnership to address all opportunities to achieve the appropriate range of diverse functions and benefits from the network of green infrastructure both within and around London

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
3.22	No reasonable alternative policy options have been identified. The creation of connected places served by open spaces that meet need is underpinned by national and regional policy.
12.6	12.6 No alternative policy options have been identified, as alternatives would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?

Delivering open space: The policy should provide a stronger commitment to delivering open space.	Brent Council	Change proposed. The revised Local Plan is supported by an Environmental Standards Study. This is informing more detailed requirements for open space in Local Plan, which are set out in Policy SP8 (Green Infrastructure and Open Space), the place policies (chapter 4), Policy EU1 (open space) and EU2 (Urban Greening and Biodiversity). This includes the requirement to deliver 30% public open space as part of development proposals outside of SIL and the delivery of 3 new local parks (2ha+) in Old Oak
Open space: Some stakeholders supported the open space provision in Old Oak North being provided as one large space, stating that it would allow for a wider range of recreational and sporting activities Other stakeholders supported the provision of a series of linked smaller spaces, as this would enable more doorstep access to open space, whilst still providing for a wide variety of functions One consultee felt it best to maintain flexibility and allow proposals to either provide the open space as one large space of a series of linked spaces	Brent Council, Hammersmith and Fulham Council, Hammersmith and Fulham Historic Buildings Group, 3 local residents Midland Terrace Resident's Group, Old Oak Interim Forum, 2 local residents Old Oak Park (DP9)	Change proposed. The Old Oak North place policy (P2) requires the delivery of a new minimum 2 ha local park in Old Oak North, to provide for a variety of leisure and recreation functions. The need for this space is evidenced in OPDC's Environmental Standards Study. The policy for Old Oak North also requires development in Old Oak North to contribute to the delivery of the Grand Union Canal local park, also of a minimum of 2ha, with the remainder of the park being provided by development coming forward in Old Oak South. Policy SP8 (Green Infrastructure and Open Space) and EU1 (open space) require that development delivers 30% of the developable area as public open space and that in addition to local parks, provision should be made of smaller open spaces and green streets.

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Green space: There is a need for more green space in North Acton. It is not clear in the Plan whether existing open space will be protected and what the approach is towards greenspace, landscaping/tree planting.	Grand Union Alliance, 3 local residents	Change proposed. The Local Plan policy EU1 looks to protect existing open spaces, unless it is re-provided with at least an equivalent quantum and quality. Policy SP8 and EU1 also requires the provision of new open space, including requiring 30% of the developable area outside of SIL being provided as public open space. Policy EU2 supports high quality urban greening and the delivery of a diverse range of ecology.
Management of open space: Policies D2 and D3 should set out how it is considering the long term management of open spaces and public realm in light of local council resources.	Brent Council, The Hammersmith Society, 1 local resident.	Noted. Policy SP8, EU1 and EU2 set out the importance of securing appropriate management and maintenance arrangements for open space. The Local Plan does not specify the exact arrangements as there would need to be detailed consideration of the most appropriate management arrangements on a case by case basis.
Amount and types of open space: Policy D3 should specific quantum and range of open space needed to meet the needs of the new community. Open spaces should provide a range of roles including for attractions, social gatherings, biodiversity/nature, community events, street markets and quiet places.	Brent Council, Diocese of London, Grand Union Alliance, The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group, 4 local residents	Change proposed. Policy EU1 (which supersedes D3) identifies that outside of Strategic Industrial Location (SIL), development should look to deliver a minimum 30% of the area as publicly accessible open space. The policy sets out that this should be delivered through local parks in locations identified in the places chapter, smaller open spaces, green streets and where it is not possible or desirable to deliver 30%, a contribution in lieu would be sought.
Nature Reserve: Support for keeping the nature reserve in its current location. Some suggested it could be relocated but the Plan would	Diocese of London, Midland Terrace Resident's Group, Old Oak Interim forum, Hammersmith and Fulham Historic Buildings Group, TITRA, 2 local residents, 2 local residents.	Noted. The starting point for the nature reserve would be to seek to retain and upgrade it as a key amenity and biodiversity space. However, it is recognised that there are essential and large

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need to ensure that areas of biodiversity and wilderness and maintained in Old Oak South.		infrastructure requirements in and around the nature reserve. As their detailed design is progressed, it may be more appropriate to relocate the space elsewhere within the scheme. Any relocation of the open space would need to be undertaken in accordance with Policies EU1 (open space) and EU2 (urban greening and biodiversity).
Embankment: The embankment to the north-west should be retained as this is essential to delivering agreed ecological enhancements.	Friends of Wormwood Scrubs, 2 local residents	Noted. The Local Plan is not proposing the redevelopment of the IEP depot during the lifetime of the Plan. The Local Plan is not directly proposing the removal of the embankment; however, were ecology on the embankment to be affected by a proposal, OPDC would require development to provide an equivalent or greater amount of biodiversity on-site or provide a financial contribution to facilitate off-site enhancements in lieu of provision, in accordance with Policy EU2.
Ecological enhancements: Any ecological enhancements should be sensitive to the character of the Scrubs and should be decided by the Trust. A number of proposals are put forward for ecological enhancements/objectives and key locations where these could take place.	Friends of Wormwood Scrubs	Change proposed. Policy P12 sets out OPDC's commitment to agree any proposals with the Wormwood Scrubs Charitable Trust. The ecological protections in Wormwood Scrubs are referenced in the supporting text. Proposals would need to accord with Policy EU2, which seeks to conserve and enhance biodiversity.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

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Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Environmental Standards Study	The development should support the delivery of the spatial vision by delivering and/or contributing towards a high quality, multi-functional green and blue infrastructure network, i.e. accessible for play and recreation, promotes walking or cycling safely, and supports wildlife, urban cooling and flood management. Proposals should: A. Provide a minimum of 30% of Old Oak's total area allocated to publicly accessible open space, which should consist of a network of well-managed, high quality, multi-functional green and civic open spaces and Green Streets, which are linked to the wider London Green Grid and Blue Ribbon Network; • This equates to approximately 4.14sqm per resident and 1sqm per worker. This standard would also be appropriate for new build in Park Royal; • In addition to provision of at least 30% accessible open space, developers should contribute towards ensuring that these spaces provide a good mix of facilities, are fully accessible, well located and properly managed and maintained; • Wormwood Scrubs is excluded from the 30% but it would be required to fulfil the role of a district park, providing good quality access to outdoor sports facilities and open space. An open space strategy will review the capacity of this open space and its facilities to identify what facilities should be provided within the development site and where facilities and open space on Wormwood Scrubs could be enhanced through developer contributions; B. Contribute towards and/or deliver 3 new local parks that are no less than 2ha in size and a range of small public open spaces and pocket parks; C. Provide a minimum 10sqm of dedicated play equipment per child; D. Incorporate a Grand Union Canal Linear Park; E. Limit overshading of open spaces. Public and private spaces should benefit from good light and microclimate, at least 2 hours of daylight on 21st March into 50% of space in line with BRE guidance; F. Aim to be biodiversity positive, in which biodiversity rich, multi-benefit, multifunctional green spaces and water bodies are highly interconnected and closely integrated with the wider green infrastructure network in a clear functional hierarchy; G. Make a positive contribution towards climate change. Green infrastructure should be maximised to provide summer shade and cooling, to the buildings and external environment, and appropriate provision for localised surface water attenuation, including sustainable drainage techniques; H. In order to ensure the long term quality and performance of green infrastructure is sustained, developments will be expected to contribute to its management and maintenance. Developers will be required to provide a detailed management plan which should set out the longer term revenue funding arrangements for open spaces and

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	commitments around continual public access;
Infrastructure Delivery Plan	• Identifies the infrastructure required to support the regeneration of the area, including social, transport, utility and green infrastructure. • **5.2. Open Space:** In the creation of this new part of London the provision of open space and the ability of the population to access open space will be extremely important and contribute to the success of the area in a number of ways including social cohesion, health and wellbeing, as well as general environmental and biodiversity benefits. There are a range of open space projects identified in the Infrastructure Schedule. There are those that identify existing open space that would benefit from enhancement and the creation of new open spaces. Some spaces will be designed to perform more of a civic function while others are intended for green space.
Public Realm, Walking and Cycling Strategy	• Open Spaces should be easily accessible from Old Oak High Street and visible to provide places to stop, relax for people of all ages and groups.
Precedent Study	• Takes lessons from local and international schemes relevant to the type of development envisioned within the OPDC area on how to deliver quality open spaces.
Sites of Importance for Nature Conservation Statement	• A summary of the evidence and approach used in designating Sites of Importance for Nature Conservation (SINC) as part of the OPDC Local Plan.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Environmental Standards Study	• This standard (Old Oak open space) would also be appropriate for new build in Park Royal (SIL);	• Open space requirements for developments within the Park Royal SIL industrial area will be addressed through a Park Royal SPD

Other evidence base

Supporting Study	Recommendations
The Mayor's Green Infrastructure Taskforce Report	• Green infrastructure in a future city should be informed by and deliver the following five objectives: o Promoting Healthy Living o Strengthening Resilient Living o Encouraging Active Living o Creating Living Landscapes o Enhancing Living Space • The economic value of green infrastructure needs to be measured based on the full range of benefits it provides. • New mechanisms for the funding and management of green infrastructure us required.

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SP9: Built Environment

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	Planning should: - always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. - take account of the different roles and character of different areas, promoting the vitality of our main urban areas - encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value - conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations
34	Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
56	The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
57	It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
58	Planning policies and decisions should aim to ensure that developments • optimise the potential of the site to accommodate development • respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation • create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and • are visually attractive as a result of good architecture and appropriate landscaping.
61	Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic

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	environment.
69	Planning policies and decisions, in turn, should aim to achieve places which promote safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion and safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas
126	Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. In developing this strategy, local planning authorities should take into account: ● the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; ● the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; ● the desirability of new development making a positive contribution to local character and distinctiveness; and ● opportunities to draw on the contribution made by the historic environment to the character of a place
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver conservation and enhancement of the natural and historic environment, including landscape.
157	Crucially Local Plans should contain a clear strategy for enhancing the natural, built and historic environment

National Planning Practice Guidance (NPPG)

Conserving and enhancing the historic environment

Policy / paragraph reference	Policy and paragraph text
004	In line with the National Planning Policy Framework, local authorities should set out their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. Such as a strategy should recognise that conservation is not a passive exercise. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset.

Design

Policy / paragraph	Policy and paragraph text

reference	
003	Local planning authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning, and should be at the heart of the plan making process.
006	Design impacts on how people interact with places. Although design is only part of the planning process it can affect a range of economic, social and environmental objectives beyond the requirement for good design in its own right. Planning policies and decisions should seek to ensure the physical environment supports these objectives. The following issues should be considered: • local character (including landscape setting) • safe, connected and efficient streets • a network of greenspaces (including parks) and public places • crime prevention • security measures • access and inclusion • efficient use of natural resources • cohesive and vibrant neighbourhoods
007	Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation. The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre.
012	Good design can help to create buildings and places that are for everyone. Planning can help break down unnecessary physical barriers and exclusions caused by the poor design of buildings and places.
025	Buildings can be formed in many ways, for example tall towers, individual stand-alone units, long and low blocks, terraces. They can all be successful, or unsuccessful, depending on where they are placed, how they relate to their surroundings, their use and their architectural and design quality. Some forms pose specific design challenges, for example how taller buildings meet the ground and how they affect local wind and sunlight patterns should be carefully considered. The length of some lower blocks can mean they disrupt local access and movement routes. Stand-alone buildings can create ill-defined spaces around them and terraces can appear monotonous and soulless if poorly designed**.**
026	This relates both to the overall size and mass of individual buildings and spaces in relation to their surroundings, and to the scale of their parts. Decisions on building size and mass, and the scale of open spaces around and between them, will influence the character, functioning and efficiency of an area. In general terms too much building mass compared with open space

	may feel overly cramped and oppressive, with access and amenity spaces being asked to do more than they feasibly can. Too little and neither land as a resource or monetary investment will be put to best use. The size of individual buildings and their elements should be carefully considered, as their design will affect the: overshadowing and overlooking of others; local character; skylines; and vistas and views. The scale of building elements should be both attractive and functional when viewed and used from neighbouring streets, gardens and parks. The massing of development should contribute to creating distinctive skylines in cities, towns and villages, or to respecting existing skylines. Consideration needs to be given to roof space design within the wider context, with any adverse visual impact of rooftop servicing minimised. Account should be taken of local climatic conditions, including daylight and sunlight, wind, temperature and frost pockets.
079	"Amenity" is not defined exhaustively in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. It includes aural and visual amenity (regulation 2(1)) and factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest (regulation 3(2)(a)). It is, however, a matter of interpretation by the local planning authority (and the Secretary of State) as it applies in any particular case. In practice, "amenity" is usually understood to mean the effect on visual and aural amenity in the immediate neighbourhood of an advertisement or site for the display of advertisements, where residents or passers-by will be aware of the advertisement. So, in assessing amenity, the local planning authority would always consider the local characteristics of the neighbourhood: for example, if the locality where the advertisement is to be displayed has important scenic, historic, architectural or cultural features, the local planning authority would consider whether it is in scale and in keeping with these features. This might mean that a large poster-hoarding would be refused where it would dominate a group of listed buildings, but would be permitted in an industrial or commercial area of a major city (where there are large buildings and main highways) where the advertisement would not adversely affect the visual amenity of the neighbourhood of the site. If the advertisement makes a noise, aural amenity would also be taken into account before express consent would be given.

London Plan (2016)

Policy / paragraph reference	**Policy and paragraph text**
2.13	B Development proposals within opportunity areas and intensification areas should: b) seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and,

	where appropriate, contain a mix of uses c) contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks d) realise scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking
2.16	A The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than sub-regional importance (see para 2.77) by: b) bringing forward adequate development capacity
3.4	A Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.
6.1	A The Mayor will work with all relevant partners to encourage the closer integration of transport and development through the schemes and proposals shown in **Table 6.1** and by: j seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners, including by securing step-free access where this is appropriate and practicable.
6.4	C DPDs should identify development opportunities related to locations which will benefit from increased public transport accessibility.
7.1	D The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood.
7.2	A The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments: a can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances b are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment c are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways d are realistic, offering more than one solution to help balance

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	everyone's needs, recognising that one solution may not work for all.
7.3	A Boroughs and others should seek to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion.
7.4	A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area. B Buildings, streets and open spaces should provide a high quality design response that: a has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass b contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area c is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings d allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area e is informed by the surrounding historic environment.
7.5	A London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.
7.6	A Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. B Buildings and structures should: a be of the highest architectural quality b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm c comprise details and materials that complement, not necessarily replicate, the local architectural character d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings e incorporate best practice in resource management and climate change mitigation and adaptation f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces g be adaptable to different activities and land uses, particularly at ground level h meet the principles of inclusive design i optimise the potential of sites

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7.7	A Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings. E Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks. These areas should be consistent with the criteria above and the place shaping and heritage policies of this Plan.
7.8	F Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration. G Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.
7.9	C Boroughs should support the principles of heritage-led regeneration in LDF policies

Draft New London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
GG2	Making the best use of land To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites. B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach. C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character. D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening. E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.

	F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance
D2	Delivering good design Initial evaluation A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and areabased strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. Determining capacity for growth B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. Design analysis and visualisation C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. Design quality and development certainty D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics. Design scrutiny E Design and access statements submitted with development proposals should provide relevant information to demonstrate the proposal meets the design requirements of the London Plan. F Boroughs and applicants should use design review to assess and inform design options early in the planning process. Design review should be in addition to the borough's planning and urban design officers' assessment and pre-application advice. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation, before a planning application is made, if they:

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	1) are above the applicable density indicated in Part C of Policy D6 Optimising housing density; or 2) propose a building defined as a tall building by the borough (see Policy D8 Tall buildings), or that is more than 30m in height where there is no local tall building definition. G The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that: 1) design reviews are carried out transparently by independent experts in relevant disciplines 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme 3) where a scheme is reviewed more than once, subsequent design reviews reference and build on recommendations of previous design reviews 4) design review recommendations are appropriately recorded and communicated to officers and decision makers 5) schemes show how they have considered and addressed the design review recommendations 6) planning decisions demonstrate how design review been addressed. Maintaining design quality H The design quality of development should be retained through to completion by: 1) having a sufficient level of design information, including key construction details provided as part of the application to ensure the quality of design can be maintained if the permitted scheme is subject to subsequent minor amendments 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter 4) local planning authorities using architect retention clauses in legal agreements where appropriate.
D6	Optimising housing density A Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to: 1) the site context 2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL) 3) the capacity of surrounding infrastructure. Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused. B The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth. 1) The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels. 2) The ability to support proposed densities through encouraging

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	active travel should be taken into account. 3) Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly. C The higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in Policy D4 Housing quality and standards, and the proposed ongoing management. Development proposals with a residential component that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design and submit a management plan if the proposed density is above: 1) 110 units per hectare in areas of PTAL 0 to 1; or 2) 240 units per hectare in areas of PTAL 2 to 3; or 3) 405 units per hectare in areas of PTAL 4 to 6. D The following measures of density should be provided for all planning applications that include new residential units: 1) number of units per hectare 2) number of habitable rooms per hectare 3) number or bedrooms per hectare 4) number of bedspaces per hectare. E The following additional measures should be provided for all major planning applications : 1) the Floor Area Ratio (total Gross External Area of all floors / site area) 2) the Site Coverage Ratio (Gross External Area of ground floors /site area) 3) the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level). These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.
D7	Public realm Development Plans and development proposals should: A Ensure the public realm is safe, accessible, inclusive, attractive, well connected, easy to understand and maintain, and that it relates to the local and historic context, and incorporates the highest quality design, landscaping, planting, street furniture and surfaces. B Maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds. C Be based on an understanding of how the public realm in an area functions and creates a sense of place, during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists.

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	D Ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings. E Ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm. F Ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm. G Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter. H Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity. I Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused. J Explore opportunities for innovative approaches to improving the public realm such as open street events. K Create an engaging public realm for people of all ages, with opportunities for formal and informal play and social activities during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm. L Ensure that on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Pedestrian crossings should be regular, convenient and accessible. M Ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm.
D8	D8 Tall buildings Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following: Definition A Based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London. Tall building locations B Tall buildings should be part of a plan-led approach to changing or

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	developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of: 1) the visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below) 2) their potential contribution to new homes, economic growth and regeneration 3) the public transport connectivity of different locations. Impacts C The impacts of a tall building can be visual, functional or environmental. All three elements should be considered within plan-making and in deciding development proposals: 1) Visual impacts a) The views of buildings from different distances need to be considered, including: i Long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views ii Mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality iii Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy. b) Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding c) Architectural quality and materials should be of an exemplary standard to ensure the appearance and architectural integrity of the building is maintained through its lifespan d) Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area e) Buildings in the setting of a World Heritage Site must preserve the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it f) Buildings near the River Thames, particularly in the Thames Policy Area, should not contribute to a canyon effect along the river which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river g) Buildings should not cause adverse reflected glare. 2) Functional impact a) The internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure

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	the safety of all occupants b) Buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process c) Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas d) It must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building e) Infrastructure improvements required as a result of the development should be delivered and phased appropriately f) Jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area g) Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings. 3) Environmental impact a) Wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building b) Air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect streetlevel conditions c) Noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building. 4) Cumulative impacts a) The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting. Public access D Publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings.

Supplementary Planning Guidance (SPG)

Policy / paragraph	Policy and paragraph text

reference	
	None directly relevant.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Implement density and height policies flexibly: Land owners supported high density development with some asking for the policy to be delivered flexibly including being supportive of delivering higher densities and tall buildings in sensitive locations.	Aurora Developments Ltd, Boropex Holdings Limited, City and Docklands Property Group, Diageo Plc, Old Oak Park, NQP Development Services, Westkite Ltd	No change proposed. The Local Plan has been updated to take a more nuanced approach to densities rather than setting overarching density ranges as per the Regulation 18 draft. The overarching approach to densities and building heights is set out in Policy SP9 (Built Environment), which identifies the area as being appropriate for high densities and tall buildings but that development proposals must also respond appropriately to sensitive locations. The places chapter provides place specific guidance on minimum homes and jobs targets, informed by OPDC's Development Capacity Study and where appropriate, provides policy guidance on appropriate building heights and locations for tall buildings.
Density and building heights concerns: Public bodies, community	Brent Council, Friends of Wormwood Scrubs, Midland Terrace Residents' Group,	Noted. OPDC is committed to developing an exemplarily designed built environment

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groups and local residents raised concerns of high densities and tall buildings. They asked for the delivery of low rise high density development that aligns with the London Plan density matrix.	Old Oak Interim Forum, The Hammersmith Society, 7 local residents	and the Local Plan has been updated to contain more detailed policies ensuring that development delivers high quality design and high standards of sustainability. To ensure the Local Plan meets the London Plan housing and employment targets for the area, development will generally be a mix of medium and high densities and height. This recognises the area's designation as Opportunity Areas. Policy SP9 recognises the need for development to appropriately respond to sensitive locations. In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF.
Managing impact on sensitive locations: The importance of managing the impact of building heights on sensitive locations was highlighted. Specifically where sensitive edges for lower density forms of development are located directly adjacent to high or highest density forms of development. Other suggestions included delivering lower densities and building heights so they do not impact on North Acton, St. Mary's and Kensal Green cemeteries, the Grand Union Canal and existing residential areas. Some stakeholders	Friends of Wormwood Scrubs, MP for Hammersmith, local resident, Hammersmith and Fulham Historic Buildings Group, Midland Terrace Residents' Group, Harlesden Neighbourhood Forum, Old Oak Interim Forum, Grand Union Alliance, Wells House Road Residents Association, Ealing Council, Inland Waterways Association, 15 local residents	Noted. The OPDC area will include new tall buildings. OPDC is mindful of the need to manage the transition from the high density development in Old Oak to surrounding areas, while optimising densities to deliver housing and employment targets. Policy SP9 requires that development responds appropriately to sensitive locations. The cemeteries have all been identified as sensitive locations. As a major transport interchange with the highest public transport accessibility in the OPDC area, the area around the Old Oak Common

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suggested that buildings heights should be lower around the Old Oak Common station to mitigate impacts on Wormwood Scrubs and that the focus for tall buildings should instead be around Hythe Road station.		Station is considered to be appropriate for higher densities and taller buildings in accordance with the London Plan. Tall buildings will also be appropriate at locations near to the proposed Hythe Road Station; however, consideration would need to be given to the setting of the existing St. Mary's Cemetery, the Grade 1 listed Kensal Green Cemetery and proposed Cumberland Park Factory conservation areas. Any proposal for a tall building would be considered against Local Plan policies dealing with environmental issues such as amenity (D6), air quality (EU4) and any tall building proposals would also be considered against OPDC's tall buildings policy (D5).

Regulation 19(1) consultation

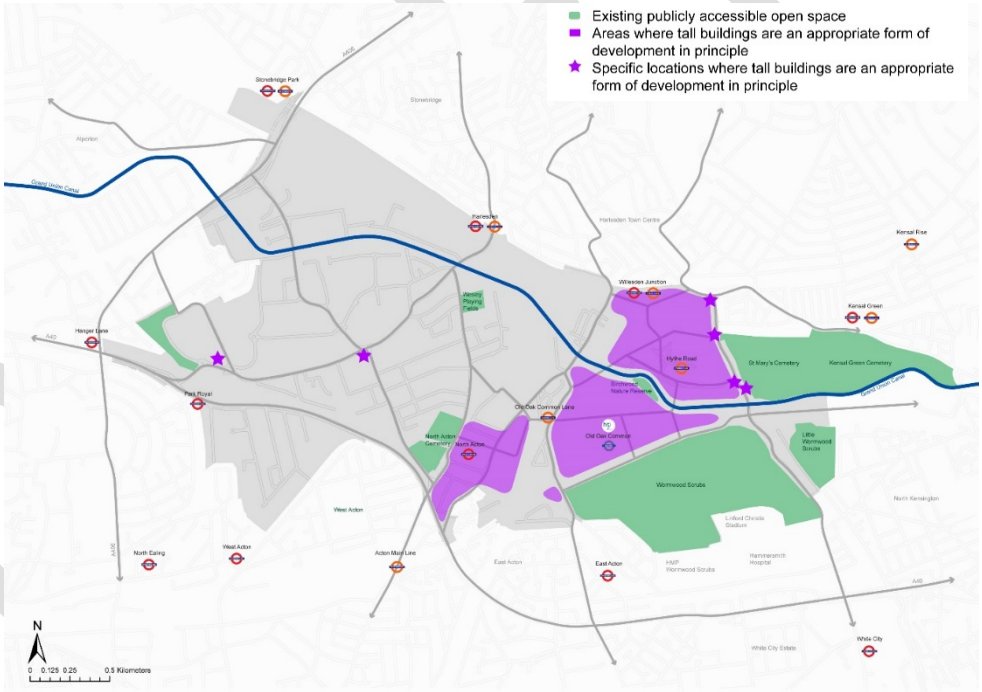
What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Character Areas Study	• Highlights the areas that will be impacted most by future development, and identifies the key characteristics and features which may inform future development in the area. These locations have informed the identification of sensitive locations within the policy.
Heritage Strategy	• Provides a deeper understanding of the historical development and significance of the Old Oak and Park Royal Area by: a. Identifying and describing historic themes and character areas. b. Identifying and setting out recommendations for designated and undesignated heritage assets and associated views.

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	• Recommends local heritage listings, thereby the resultant heritage sensitive locations.
Environmental Modelling Framework Study	• Key Output: A review and assessment of the existing parameters and tools used to assess the impact of development including orientation, massing, building height on environmental factors including daylight and sunlight, potential solar gain and overheating of buildings and wind regimes.
Environmental Standards Study	• Key Recommendation: High density development poses significant challenges to the quality of development in Old Oak and Park Royal. The adoption of short, medium and long term targets should inform all development and applied rigorously or the overall quality of the development and its impact on London could be significant.
Precedents Study	• Lessons learnt from Hudson Yards, Aldgate Place, Highgate Shoreditch Hotel, The Shard and London Bridge Redevelopment and 30 St Mary Axe (Gherkin) on how to deliver high quality tall buildings in high density developments.
Tall Buildings Statement	• Within the OPDC area, a tall building is defined as being above 15 storeys or a minimum of 48 metres above ground level. • Tall buildings are considered to be appropriate in principle in the areas depicted in the image below:  • The definition and locations of tall buildings as an appropriate form of development in principle have been defined in accordance with Draft New London Plan policy D8.
Views Study	• Panoramic Views: It will be possible to identify clusters of taller development and individual tall buildings as part of a wider skyline. • Proposes guidelines for the Wormwood Scrubs Character Area to test any proposals for tall buildings in its views and carry out a landscape and visual impact analysis.
Old Oak North Development Framework Principles	• Average shoulder and/or podium height of 8 to 12 storeys above ground level with tall buildings above 15 storeys. • 6 to 8 storeys fronting on to Grand Union Canal. • Tall buildings are appropriate at locations of activity.

Park Royal Development Framework Principles	• Average shoulder and/or podium height of 6 to 8 storeys. • A tall building is appropriate within Park Royal Centre on the north east corner of the ASDA site.
Scrubs Lane Development Framework Principles	• Average shoulder and/or podium height of 6 to 10 storeys. • Lower heights adjacent to Cumberland Park Factory Conservation Area. • 6 to 8 storeys fronting on to Grand Union Canal. • A single tall building is appropriate within each of the four clusters.
Victoria Road and Old Oak Lane Development Framework Principles	• Average shoulder and/or podium height of 8 to 12 storeys. • Lower heights adjacent to sensitive locations. • Tall buildings are appropriate across North Acton and in locations along Old Oak Street within Acton Wells.

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	• **None**

Other evidence base

Supporting Study	Recommendations
	• **None**

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SP10: Integrated Delivery

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.
31	Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development.
41	Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.
47	Local planning authorities should identify key sites which are critical to the delivery of the housing strategy over the plan period.
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: • the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); • the provision of health, security, community and cultural infrastructure and other local facilities;
162	Local planning authorities should work with other authorities and providers to: ● assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and ● take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.
177	It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is

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	important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan.

National Planning Practice Guidance (NPPG)

Design

Policy / paragraph reference	Policy and paragraph text
013	Ensuring a place is durable and adaptable will help make it less resource hungry over time. For example the layout of infrastructure servicing development (including water supply, sewerage, drainage, gas, electricity, cable, telephone, roads, footpaths, cycle ways and parks) should take account of foreseeable changes in demand to reduce the need for expensive future changes.

Local Plans

Policy / paragraph reference	Policy and paragraph text
018	A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the viability of development. The Local Plan should make clear, for at least the first 5 years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. This may help in reviewing the plan and in development management decisions. For the later stages of the plan period less detail may be provided as the position regarding the provision of infrastructure is likely to be less certain. If it is known that a development is unlikely to come forward until after the plan period due, for example, to uncertainty over deliverability of key infrastructure, then this should be clearly stated in the draft plan.

Development capacity

Policy / paragraph reference	Policy and paragraph text
https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment	Housing and economic land availability assessment

London Plan (2016)

Policy / paragraph reference	Policy and paragraph text
2.16	A The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than sub-regional importance (see para 2.77) by: a) co-ordinating public and private infrastructure investment
8.1	A The Mayor will work collaboratively to deliver a positive approach to enabling new development in London, optimising land use and promoting/enabling locations for strategic development. C The Mayor will work with boroughs, infrastructure providers, national government, regulators and others involved in infrastructure planning, funding and implementation to ensure the effective development and delivery of the infrastructure needed to support the sustainable management of growth in London and maintain its status as a world city in accordance with the vision and objectives set in Policy **1.1**.

Draft New London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
GG2	To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites. B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach. C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character. D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening. E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth. F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.
DF1	Delivery of the Plan and Planning Obligations A Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability

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	testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery. B If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application. C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG. D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this: 1) Recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth. E Boroughs are also encouraged to take account of part D in developing their Community Infrastructure Levy Charging Schedule and Regulation 123 list.

Supplementary Planning Guidance (SPG)

Policy / paragraph reference	Policy and paragraph text
	None directly applicable

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
	No alternative policy options were considered.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?

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Infrastructure Delivery: Concern raised over various aspects of infrastructure delivery, Including education - with the Boroughs concerned regarding the ability of the existing schools capacity to expand; and health – the need to be flexible with this.	Old Oak Park (DP9), HUDU, Hammersmith and Fulham Council, Grand Union Alliance, Brent Council, 3 local residents	Change proposed. Further work on education provision has been undertaken as part of OPDC's Education and Health Needs Study. This identifies that there are schools that can be expanded off-site to meet the needs of early phases of development. The revised Local Plan also now clearly identifies the needs for on-site provision. The supporting text to Policy TCC4 recognises that this need is based on current population projections based on tenure, mix and capacity assumptions and that this need might flex over time and needs to be carefully monitored and that there therefore needs to be a degree of flexibility in the approach taken to social infrastructure provision.
Infrastructure Prioritisation: Various opinions expressed regarding what infrastructure should be prioritised. Consensus that education and health in particular are important for social infrastructure. Improvements to Willesden Junction Station also got particular mention.	Brent Council, Diocese of London, 15 local residents	Change proposed. Education and health needs have been informed by OPDC's Education and Health Study. Needs are contingent on the speed of delivery and type of housing (tenure, size, quantum), but the Infrastructure Delivery Plan (IDP) identifies likely dates that facilities need to be delivered or expanded. On-site requirements have had sites allocated and these are referenced in Policy TCC4 and in the relevant place policies.
Infrastructure costs and funding gap: Some concern were expressed regarding the level of funding gap, how this would be covered and the impact this could have on the delivery of Affordable Housing.	Grand Union Alliance, Hammersmith and Fulham Disability Forum, Old Oak Park (DP9)	Change proposed. The revised Local Plan sets out further detail in the Delivery and Implementation chapter on the strategies that OPDC will employ to support the timely regeneration of the area and secure the necessary infrastructure to support the needs of the new population. OPDC's Local Plan is supported by an

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		Affordable Housing Viability Assessment and Whole Plan Viability Assessment, which has assessed the viability of affordable housing delivery to inform OPDC's affordable housing policy. The Delivery and Implementation chapter recognises that a balance will have to be struck between the requirements of the Local Plan and the priorities to deliver affordable housing, sustainability standards and infrastructure.
Table 16: Infrastructure requirements additional items: Requests were made to add items to Table 16: - Mitre Road Bridge; - Additional capacity on North and West London Lines; - Infrastructure to support operation of the Grand Union Canal; - Public realm enhancements; - Cycling facilities; - Items from Park Royal Transport Strategy; - Soil treatment; - Link to Kensal canalside; - Future of Grand Union Canal sub surface 132kV cables; and - Waste disposal facilities.	GLA, TfL, Hammersmith and Fulham Council, Brent Council, The Hammersmith Society and 2 local residents	Change proposed. OPDC's evidence base has been significantly updated between the Regulation 18 and Regulation 19 versions of the Local Plan. The Regulation 19 Plan includes a longer list of infrastructure requirements, informed by this evidence. Suggested infrastructure items were considered as part of this evidence. OPDC's Infrastructure Delivery Plan (IDP) supports the Local Plan and sets out the required infrastructure to support development in the area.
Phasing of development and infrastructure: A range of respondents commented on the phasing of development across the area. Several private landowners expressed a desire to bring their sites forward sooner than set out within the Local Plan. Members of the public were more concerned that the planning for the longer term phases was occurring too	Old Oak Park (DP9), Canary Wharf PLC, Brent Council, Montagu Evans (for a private land owner, Quod (for a private land owner)	Change proposed. The phasing diagrams and Development Capacity Study have been updated to take on board comments from stakeholders. Policy SP10 supports development being brought forward in advance of the phasing identified. The Local Plan is supported by an Infrastructure Delivery Plan (IDP) which identifies what infrastructure is needed, when and sources of funding/financing.

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soon and that the infrastructure was not in place to support the amount of development that was occurring in earlier phases. Conversely developers claimed that infrastructure was being front-loaded and that this was not required.		Further work has been undertaken across a number of studies to identify infrastructure requirements and the phasing of infrastructure to support the delivery of homes and jobs and this has been included in the IDP.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
To be included. Please refer to the Statement of Consultation in the meantime.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Within the plan period, the OPDC area has capacity to deliver 20,100 new homes and space for 40,400 new jobs.
Development Infrastructure Funding Study	• **Planning policy and strategy must remain flexible** enough to cope with changing market and economic conditions – for example, perhaps by delivering lower levels of affordable housing in the early phases in order to pump-prime infrastructure delivery with increased levels of funding. • **A very practically orientated project delivery 'roadmap' needs to be written** which would identify tasks on the critical path, set dates for those issues to be resolved, and clarify delivery roles and responsibilities; focus head-on on how any problems will be resolved; and define issues in time sequence, which would allow the focusing of resources on short term issues and a process of active planning for medium term issues. This would also help the political process by clarifying decisions that need to be taken, when they need to be taken, and what the ramifications of choices are. •
Infrastructure Delivery Plan	• Deliver a range of new and enhanced transport, green, utilities and social infrastructure within, and where appropriate outside, the OPDC area to meet demands of the development. • The IDP will be used by the OPDC to assist in the delivery of projects and assist in identifying and negotiating appropriate Section 106 contributions from developers and for the prioritisation of the use of other monies received as developer contributions e.g. Community Infrastructure Levy (CIL) by OPDC.
Social	• 1 primary school

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Infrastructure Needs Study	• 1 secondary school • 1 health hub • Expansions to Central Middlesex Hospital and Hammersmith Hospital • 4 supernurseries • 2 community hubs • 2 sports centres
Utilities Study	• The pace, timing and location of specific plots that are released for development, in addition to their intended mix, ownership and decision-making responsibility, creates a complex challenge for the overall configuration of essential enabling infrastructure, energy assets and utility systems. There is a progressive opportunity, which should be reviewed cyclically, to establish core assets and to optimise systems in order to deliver: • Resource efficiencies • Cost efficiencies (reducing the capital outlay for new infrastructure assets) • Innovation and technology advancement (delivering an international exemplar of smart enabled development)

Rationale for any non-implemented recommendations

Supporting Study	Rationale for not including
	None

Other evidence base

Supporting Study	Recommendations
	• **None**

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