

LOCAL PLAN

Draft for Regulation 18 Consultation 4 February 2016



Old Oak and Park Royal in west London



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Chair's Foreword





Sir Edward Lister Deputy Mayor for Planning and Chair of the Board, Old Oak and Park Royal Development Corporation

Old Oak and Park Royal Development Corporation (OPDC) has been in existence for less than a year and this first draft of the Local Plan represents a huge step forward for the Corporation in beginning to shape the area.

Old Oak and Park Royal is set to become the UK's largest development project and most successful industrial location. It can provide unparalleled opportunities for the UK, London and local communities. The area is set to be transformed into one of London's key destinations, better connected than perhaps anywhere else in the UK. This transformation brings with it significant opportunities to deliver much needed homes and jobs that can support London's growth. New communities will grow up supported by a full range of infrastructure and services. However, the area needs to not only be a place to live and work, but one to visit and enjoy, time and again. These elements will be brought together to create a real sense of place with a series of high quality neighbourhoods and spaces, that locals and Londoners will be proud of and flock to.

In November 2015, the Mayor adopted the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF), which sets out a clear strategy for the redevelopment of the area around the planned Old Oak Common Station, whilst also outlining the need to protect and intensify Park Royal as a key cog in London's economy.

This first draft of the Local Plan builds on the OAPF and once adopted, will provide a clear blueprint for how this area will be regenerated to deliver a thriving new part of London. As a document for consultation, this draft Local Plan sets out a series of suggested preferred policies, policy options and alternative options for how this critical regeneration project could be planned for over the next 20 years. It provides substantially more detail than the OAPF and is supported by a vast array of studies that OPDC officers have been developing over the past few months. Guiding the development of a significant new part of London requires flexibility. The Local Plan will help to set those key parameters to allow a great new place to develop and change over time. The many pieces of work the planning team has progressed will ensure that the approach we take across Old Oak and Park Royal is the right one and that it delivers a best practice, innovative and sustainable approach.

This is your chance to help shape these policies and I am delighted to introduce this draft Local Plan and its supporting studies for public consultation.

Consultation information

OVERVIEW

OPDC's Local Plan will be the key planning policy document for the OPDC area. It will contain policies that will be used in the determination of planning applications and that will shape how the area will be developed over the next 20 years and deliver a new thriving heart of London.

This version of the Local Plan is a draft document. It has been specifically produced for public consultation and this is an opportunity for you to comment on and shape Local Plan policy for this area. This is your chance to make representations on what policies you think the Local Plan ought to contain. Throughout the document we have set out consultation questions to help stimulate responses but as a consultation document, you can comment on any element of the draft Local Plan and its supporting studies.

It would be helpful for us if when responding you could clearly set out which page number, paragraph, policy, diagram, image or question your comment relates to. Alternatively, please use the Local Plan Consultation Response Form which sets out the different elements of the document to help you to record your comments clearly against the corresponding section.

WHEN AND HOW TO RESPOND

Public consultation runs from:

4th February 2016 to 31st March 2016

Respond via the draft Local Plan engagement platform:

opdc.commonplace.is

Respond by email to:

localplan@opdc.london.gov.uk

Respond by post to:

Local Plan Consultation Old Oak and Park Royal Development Corporation City Hall Queen's Walk London SE1 2AA

HOW TO FIND OUT MORE

Visit our dedicated engagement platform

All documents can be read and downloaded

from:

opdc.commonplace.is

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

View a hard copy

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

- Acton Town Hall Library, High Street, W3 6NE;
- Brent Civic Centre, Engineers Way, Wembley, HA9 0AF;
- City Hall, Queens Walk, London, SE1 2AA;
- Ealing Council Offices, Perceval House, 14/16 Uxbridge Road, W5 2HL;
- Hammersmith Town Hall, King Street, W6 9JU;
- Harlesden Library, NW10 8SE;
- Old Oak Community Centre, Braybook Street, W12 0AP; and
- Shepherd's Bush Library, 6 Wood Lane, W12 7BF.

Alternatively, hard copies of this Local Plan

can be made available on request by contacting OPDC, either via email or by post (see above).

Drop-in to a public exhibition or workshop

OPDC will hold a number of drop-in sessions, as well as workshops for specific policy issues in the Old Oak and Park Royal area on the below days to enable local people to discuss proposals and provide their views in person. To find out about when these are happening please visit:

opdc.commonplace.is



Tweet questions during a Question & Answer session

Officers will be ready to take your questions on anything to do with the draft Local Plan.

To find out when the Q&A sessions are taking place, please visit:

opdc.commonplace.is

Tag your tweet #AskOPDC and the team will try to respond to as many questions as pos-

sible and record comments as consultation feedback where relevant.

WHAT HAPPENS NEXT?

Following consultation on this draft of the Local Plan, OPDC officers will produce a report that summarises the comments received as part of this consultation and provide a response to these comments. This response will explain how comments received during public consultation have been considered in the production of the next draft of the Local Plan.

The next steps are:

Autumn 16	Draft Local Plan published for second consultation
Early 17	Local Plan Examination in Public
Spring 17	Local Plan Adoption



INTRODUCTION



Introduction

STATUS OF THE LOCAL PLAN

Legal Status

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

1.2 Part 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the procedure for the production of Local Plans. This version of the Local Plan constitutes the consultation required under Regulation 18.

Policy Status

1.3 Alongside the National Planning Policy Framework (NPPF), London Plan, Old Oak and Park Royal Opportunity Area Planning Framework, West London Waste Plan DPD and any Neighbourhood Plans, OPDC's Local Plan, once adopted, will be the key planning policy document against which planning applications within the OPDC area will be assessed (see figure 1).

1.4 The policies in the Local Plan must be 'consistent' with the NPPF and in 'general conformity' with the London Plan. To make this relationship clear, each policy in this consultation draft document is supported by a 'policy context' section which sets out the relevant NPPF and Local Plan policies underpinning the draft Local Plan policy (see 'How to use this document' section below). The policies in this draft Local Plan should not repeat policies already contained in the NPPF and London Plan. This draft Local Plan should therefore be read in conjunction with these other two policy documents.

1.5 Once adopted, OPDC will be able to adopt Supplementary Planning Documents (SPDs) to this Local Plan. SPDs can provide more detailed policies and guidance to policies contained in this Local Plan and can be a helpful way of drilling into a greater detail for a policy theme or a particular location.





Relation to Local Authority planning documents

1.6 As OPDC progresses its Local Plan, the weight of Local Authority DPDs and SPDs covering parts of the OPDC area will diminish as they are superseded by the growing material weight of OPDC's Local Plan (see figure 2). The exception to this rule is the West London Waste Plan, which was adopted by OPDC Board in July 2015 as a DPD.



Figure 2: Change in material weight

Relationship with the Old Oak and Park Royal Opportunity Area Planning Framework

1.7 The Old Oak and Park Royal OpportunityAreaPlanningFramework(OAPF) was adopted by the Mayor in November 2015 as Supplementary Planning Guidance (SPG) to the Mayor's London Plan (2015). As SPG to the London Plan, the document is a significant material consideration in the determination of planning applications in the OPDC area. This existing OAPF has helped to inform the policy themes and draft policies in this Local Plan. The OAPF should be read in conjunction with the Local Plan, but as this draft Local Plan progresses through its various regulatory stages, its policies would accrue greater weight than the guidance and principles in the OAPF.



Relation to emerging government policy and legislation

1.8 The government is currently consulting on changes to the NPPF. The changes propose amongst other things to:

- amend the definition of affordable housing to cover other products (such as Starter Homes);
- support high density development around commuter hubs; and
- include a presumption in favour of delivering homes on brownfield land, including the release of land to allow for the development of Starter Homes.

1.9 In parallel to the consultation on the NPPF, the Draft Housing and Planning Bill is currently going through the parliamentary

process. A number of its clauses are linked to the proposed NPPF changes.

1.10 If the NPPF is revised or if the draft Housing and Planning Bill is enacted during the production of this Local Plan, necessary amendments may be made to adequately reflect any new national policy or legislation.

Duty to Cooperate

1.11 The duty to cooperate is a legal requirement set out in the Localism Act. It requires local planning authorities and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. In accordance with the Duty to Cooperate, OPDC has been working closely with these authorities and bodies in the production of this draft Local Plan and in the preparation of other planning policy and development management and infrastructure delivery matters.

HOW TO USE THE DOCUMENT

1.12 In order to keep the document spatial and succinct, the draft Local Plan does not look to re-iterate national or regional policy where this provides sufficient policy detail. This document should therefore be read in conjunction with the National Planning Policy Framework (NPPF), associated National Planning Practice Guidance (NPPG) and the Mayor's London Plan.

1.13 The document is structured around a series of policy themed chapters (shown in figure 3). At the start of each chapter, the draft Local Plan sets out the policy themes that the chapter covers and invites stakeholders to suggest additional policies that may be required to cover specific policy issues.

Figure 3: Draft Local Plan structure



1.14 Within each chapter there are a series of policies which take two forms: 'preferred policies' or 'policy options'.

1. Preferred policies

1.15 Where there is a preferred policy this is made clear in the Local Plan. The justification and policy basis for it being a preferred option is provided.

1.16 Where there are realistic alternative approaches that could be taken to the preferred policy, these have been set out. We are inviting stakeholders' thoughts on these alternatives and suggestions of other alternatives through the consultation questions. Figure 4 presents how the preferred policies are structured.

2. Policy Options

1.17 Where there is not a preferred policy then a series of options are presented and these tend to be more draft in nature. Figure 5 presents how the 'policy options' are structured.

1.18 For the next draft of the Local Plan, the 'key issues' and 'policy context' section will be removed from the polices to make the document more streamlined, but it was felt helpful to include in this draft for consultation to inform stakeholders of the issues being contended with and the national and regional policy context that the policy is working within.

Figure 4: Preferred Policy option

cy Text explaining why the preferred policy option has been identified and what evidence supports it.

Justification

Alternative Policy Options

Sets out realistic alternatives to the preferred policy option and explains potential positive and negatives of the alternative and why at this stage the option is not preferred.





SUPPORTING EVIDENCE BASE DOCUMENTS

1.19 This draft Local Plan is supported by a number of supporting evidence documents. Figure 6 sets out these supporting documents and their relation to the draft Local Plan. OPDC has produced a 'Summary of Supporting Studies' document which provides an executive summary for each of the studies, including details on the studies' key outputs and recommendations. These supporting evidence documents have also been listed in the 'key evidence' sections at the start of chapters where they are of relevance. These documents are in draft and may be amended post consultation. We are therefore inviting stakeholders to provide comments on these supporting documents as part of this consultation on the Local Plan. All supporting studies are available on OPDC's online engagement platform or in hard copy at the locations identified on page 6.

1.20 Of particular importance is the Integrated Impact Assessment (IIA). The IIA fulfils the statutory requirements for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (in a manner that incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations). The approach also fulfils the requirements for Health Impact Assessment, Equalities Impact Assessment and Community Safety Impact Assessment. All draft Local Plan policy options, including the alternative policy options, have been appraised in OPDC's IIA.

1.21 A public consultation was held on the IIA Scoping Report between 4th September and 9th October 2015, in accordance with regulation 12(5) of the SEA Regulations. The Scoping Report consultation presented the suggested scope of the IIA for comment. Consultation responses have been used to amend the scope to reflect stakeholders' and the community's comments. Relevant documentation can be found on the OPDC engagement platform.

1.22 A Habitats Regulation Assessment (HRA) Screening exercise is also being carried out in accordance with European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive'). The role of this exercise is to determine whether the emerging content of the draft Local Plan will generate an adverse impact on the integrity of a 'Natura 2000' site. For the OPDC area, these sites are Richmond Park and Wimbledon Common. Relevant emerging HRA screening information accompanies this draft Local Plan as part of the IIA. A full Screening Report will be produced for the next version of the draft Local Plan.



THE OPPORTUNITY

1.23 The OPDC area covers the Old Oak Common and Park Royal Opportunity Areas in the Mayor's London Plan (2015), which together are identified as having the capacity to deliver a minimum additional 25,500 homes and indicative 65,000 jobs. The London Plan identifies Old Oak alone as having the capacity to deliver a minimum 24,000 homes and 55,000 jobs representing London and the UK's largest regeneration project. This scale of development has far reaching benefits at a national, regional, west London and local scale. Park Royal is Europe's largest industrial estate and is a vital cog in the London economy, accommodating over 1,500 businesses employing over 36,000 people. The Mayor's London Plan (2015) identifies that through redevelopment and intensification, it has the potential to deliver an indicative 10,000 jobs and a minimum of 1,500 additional homes.

For the UK

1.24 The OPDC area and particularly Old Oak is set to be transformed in 2026 with the opening of Old Oak Common Station, which will connect London Crossrail and National Rail services to the newly built High Speed 2 line in a station nearly the size of Waterloo, accommodating over 250,000 passengers a day. The creation of this new station will dramatically improve transport accessibility in the immediate area, across London and also across the entire UK. Passengers will need to change trains at Old Oak if they are travelling to and from the north and London's two largest airports - London Heathrow and London Gatwick. London Heathrow will be just 8 minutes from Old Oak Common via London Crossrail, whilst journeys from the north to Gatwick via Old Oak Common will be 15 minutes shorter via the West London Line. The new station will also dramatically increase the nation's access to Central London and the West End, which will be just 10 minutes from Old Oak via Crossrail.

1.25 Centred on this new transport superhub, the OPDC area constitutes the UK's largest regeneration project. This development potential could bring enormous rewards for the national economy, with the new jobs having the potential to generate billions of pounds for the UK economy. Likewise, the additional 25,000+ homes the area could deliver will contribute to combatting the nation's housing shortage as well as contributing billions of pounds to the UK through housing consumption.

For London

1.26 The scale of development in Old Oak and Park Royal will make a significant contribution to London's growing need for homes and jobs. Strategic transport infrastructure provision in the OPDC area will also help transform access across London – both within the city and to the rest of the UK.

1.27 London's population has never been higher and London-wide, the Mayor has identified the need for an additional 49,000 homes per annum to meet London's housing needs over the next 20 years. At 24,000 homes, Old Oak Common represents London's largest Opportunity Area in terms of its capacity for new homes and ability to secure a range of housing types and tenures.

1.28 Across the OPDC area there is the capacity to deliver an additional 65,000 jobs of which approximately 55,000 would be in Old Oak and 10,000 in Park Royal. Together, this represents the largest quantum of new jobs in London outside of the City and this could help further strengthen London's economic output and role as a world city. Millions of people will be within an hour's journey time of Old Oak, making the new office hub an attractive location for employers.

1.29 In support of these new homes and jobs, there will be opportunities for a number of supporting ancillary uses. At over 135 hectares of developable land, Old Oak provides particular opportunities for a range of supporting uses. OPDC has developed a Cultural Principles document to consider how OPDC will work to facilitate the continued growth in London's cultural offer to further cement London's position as the world's cultural capital and to embed culture within the area.

1.30 The transport improvements resulting from the provision of the Old Oak Common Station will provide London-wide benefits. Approximately one third of Londoners accessing HS2 will board trains at Old Oak. This will bring Londoners within 38 minutes of Birmingham and fast access to other UK cities, such as Leeds, Manchester, Liverpool and Newcastle. Within London itself, connectivity between London Overground and Crossrail will enhance accessibility for many residents and employees across London.



For west London

1.31 Much of west London is residential in character. The vast majority of its housing stock is made up on Victorian, Edwardian and inter-war housing. Like much of London, west London has in recent years suffered from a chronic housing shortage and particularly a shortage in affordable housing. West London's Opportunity Areas are the main locations for delivering these new homes and together, these have the capacity to deliver an additional 84,000 homes, representing over 20% of London's new homes over the next 20 years. The OPDC area is anticipated to have a significant impact on west London's housing supply providing over 30% of these new homes and within this, the opportunity for a significant amount of new affordable homes.

1.32 West London makes a significant contribution to the economy of Greater London. Its economic activity is centred on its town centres (such as Shepherds Bush, Hammersmith, Ealing and Wembley) and employment estates (such as Park Royal and the Golden Mile in Brentford). The economy of west London is to a large degree related to its position between Heathrow - London and the UK's largest airport and the West End and City – London's economic powerhouses. As with housing, West London's Opportunity Areas are likely to be the key centres for the delivery of new employment and the London Plan (2015) identifies that together, these Opportunity Areas could deliver 94,000 jobs . representing over 18% of London's new jobs

over the next 20 years. Of this over 65% of the jobs could be delivered within the OPDC area. Park Royal is already a vital cog in the economic engine of west London, currently providing over 36,000 jobs. An additional 10,000 jobs here will help with the growth of existing sectors and potential for new sectors to emerge and establish themselves. In Old Oak, the creation of a new commercial hub around Old Oak Common Station will help drive forward the economy of west London and help west London to continue to compete with other parts of the London and wider south-eastern economy.

1.33 Transport infrastructure provision in Old Oak will have a significant impact on accessibility and growth across west London. The new station on the North London Line at Old Oak Common Lane will provide connections to Crossrail and HS2 for residents from locations such as Richmond and Gunnersbury (the Golden Mile) and via Willesden Junction. locations such as Wembley Opportunity Area and Harrow. On the West London Line, a new station at Hythe Road will provide connections to Crossrail and HS2 for locations such as the White City and Earl's Court and West Kensington Opportunity Areas. The OPDC area is also well connected to the wider west London area by the strategic road network. Both the A40 and A406 (North Circular) provide for direct connections to other locations in west London, although both suffer from heavy traffic congestion.

For the local area

1.34 The immediate context of the OPDC area contains some of the most deprived areas in the country. Locations such as Harlesden and Stonebridge are ranked within the top 10% most deprived wards nationally and have issues with income deprivation and health. The OPDC area and particularly infrastructure in the Old Oak area, currently separates many of the communities bordering the OPDC area. New development has the opportunity to overcome this severance and knit together this part of west London. The scale of transformation planned in the OPDC area will further spur the regeneration of these surrounding areas and help to unlock additional development and growth. OPDC is developing a Socio-Economic Regeneration Strategy which will identify mechanisms to ensure that surrounding communities benefit from employment opportunities both during and post-construction. OPDC is also working with surrounding local authorities to plan for the integration of the OPDC area into the wider hinterland. OPDC will work with the boroughs to develop 'fringe masterplans'. These masterplans will consider the potential for better connectivity and permeability between OPDC and these areas. Figure 8 shows the areas currently under consideration and these include:

White City Opportunity Area and north of White City. White City is currently being transformed with the expansion of Westfield, development of Imperial College's White City Campus and



redevelopment of the BBC Television Centre. Its OAPF was adopted in 2013 and development in this area is well underway. Coordinated public realm improvements could deliver better connectivity between the OPDC area and White City. Economic synergies will also be explored such as the potential for Imperial College to continue to grow its west London campus and look to Park Royal today and Old Oak in the future to provide scale-up incubator space, student and staffing accommodation and teaching facilities;

- Harlesden Town Centre, which currently suffers from significant economic deprivation. Improved connections between it and the OPDC area and employment and training initiatives provide significant opportunities for residents and businesses in Harlesden to benefit from regeneration. OPDC and Brent Council have established a Harlesden sub-group to coordinate projects and strategies for the area:
- Kensal Canalside Opportunity Area, which is immediately to the east of the OPDC area and is identified as having the capacity to deliver a 2,000 new jobs and a minimum 3,500 new homes. There will be opportunities to improve connections with Kensal Canalside and OPDC will work with the Royal Borough of Kensington and Chelsea to explore ways that this can be achieved;
- Alperton, to the west of the OPDC area has been identified as a 'Housing Zone' by the Mayor of London with additional

funding for the delivery of affordable housing. The Alperton housing zone is identified as having the capacity to deliver over 3,000 homes;

- Wembley Opportunity Area, which is less than 2 miles from the OPDC area and is west London's second largest Opportunity Area after Old Oak, has the potential to deliver 11,500 homes and 11,000 jobs. In future, Wembley could potentially be better connected to Old Oak through the provision of a spur to the West Coast Main Line, but there are also opportunities for more short-term solutions to better connect Wembley to the OPDC area;
- Acton, which is located to the south of the OPDC area. The area suffers from concentrations of deprivation but also huge opportunities likely to be brought about by the opening of a Crossrail station at Acton Main Line in 2018. Ealing's Core Strategy identifies that this could bring about the delivery of an additional 2,300 homes over the next 20 years. Improved connections from North Acton will provide significant opportunities for Acton to benefit from regeneration in the OPDC area; and
- Centres in the wider area such as Ealing, Southall, Wembley, Hammersmith and Kensington that will be influenced by the scale of development proposed at Old Oak and Park Royal. There is a need for close collaboration with the surrounding local authorities to consider what these influences might be and ensure that measures are taken to capture

opportunities and mitigate any potential impacts.



