

OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Integrated Impact Assessment (including Habitats Regulation Assessment Screening)

LOCAL PLAN SUPPORTING STUDY

Draft for Regulation 18 Consultation
4 February 2016



MAYOR OF LONDON



Role of this study

This study has been produced to inform the draft Local Plan and should be read alongside other relevant studies, the draft Local Plan and the London Plan.

Study overview

Document title	Integrated Impact Assessment (including Habitats Regulation Assessment Screening)
Lead author	Arcadis (incorporating Hyder Consulting)
Purpose of the study	Integrates the following impact assessments of the Local Plan to meet European and national requirements and best practise approaches : <ul style="list-style-type: none"> ■ Sustainability Appraisal and Strategic Environmental Assessment; ■ Health Impact Assessment; ■ Equalities Impact Assessment; and ■ Habitats Regulations Assessment
Stage of production	Draft completed to assess Regulation 18 version of the Local Plan following Scoping Report Consultation.
Key outputs	<ul style="list-style-type: none"> ■ Sustainability Appraisal and Strategic Environmental Assessment: Process for assessing the social, economic, and environmental impacts of the Local Plan and aims to ensure that sustainable development is at the heart of the plan-making process. ■ Health Impact Assessment: high-level assessment of the possible health impacts of the Local Plan. ■ Equalities Impact Assessment: high-level assessment of the possible equalities impacts of the Local Plan. ■ Habitats Regulations Assessment: A HRA screening exercise will be undertaken to determine if the Local Plan would generate an adverse impact upon the integrity of a Natura 2000 site (for the OPDC area, these are Richmond Park and Wimbledon Common).
Key recommendations	<ul style="list-style-type: none"> ■ Ensure the contents of the draft Local Plan consider, support and enhance: <ul style="list-style-type: none"> o the component environmental, social and economic elements of sustainability o equality for all o physical, mental and emotional health and well being ■ Ensure the contents of the draft Local Plan are screened for any impact on Natura 2000 sites.
Relations to other studies	Interfaces with all other evidence base studies through their input into the draft Local Plan.
Next steps	The Assessment is in draft and is available for comment. Necessary revisions will be made following public consultation before the document is finalised to sit alongside the Regulation 19 consultation on the Local Plan.

Consultation questions

1. Do you agree with the recommendations of this supporting study? If not, please explain why.
2. Do you agree with the methods used in delivering the recommendations? If not, please set out alternative approaches and why these should be used.
3. Are there any other elements which the supporting study should address? If yes, please define these.

You can provide comments directly through:

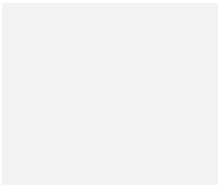
opdc.commonplace.is

OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION REGULATION 18 DRAFT LOCAL PLAN

Integrated Impact Assessment
Draft Report

DECEMBER 2015

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Non-Technical Summary

Introduction

As a Local Planning Authority, the OPDC has a duty to prepare a Local Plan that sets its strategy for development within its area and the policies that will be used to direct development and determine applications for planning permission across the entire OPDC area. The plan period will be to 2037.

When preparing the Local Plan it is a legal requirement to undertake a Sustainability Appraisal (SA) to ensure that it is developed within the principles of sustainable development. The term Integrated Impact Assessment (IIA) can be used to describe the process of covering more than one type of impact assessment into a single process. Integrating different types of impact assessment into a single process can improve efficiencies in both the assessment itself, as many of the issues covered in the different forms of assessment overlap, as well as simplifying outcomes and recommendations for policy makers. Where more detail on certain issues is required or necessary, this can be undertaken and included within the IIA. This approach has been adopted by the Mayor of London, who has taken an integrated approach to assessing the impacts of his strategies, incorporating the requirements of SEA, SA, HIA, and EqIA. This IIA draws together the following impact assessments:

- Sustainability Appraisal and Strategic Environmental Assessment;
- Health Impact Assessment;
- Equalities Impact Assessment; and
- Habitats Regulations Assessment (HRA Screening will be undertaken as a parallel process, the findings of which will be integrated into the IIA as appropriate).

Independent consultants, Arcadis Consulting (UK) Ltd., have undertaken the IIA of the OPDC Regulation 18 Local Plan. This Non-Technical Summary provides a high-level summary of the findings of the Draft IIA.

Strategic Environmental Assessment and Sustainability Appraisal

SA is a process for assessing the social, economic and environmental impacts of a Plan as it develops and it aims to ensure that sustainable development is at the heart of the plan-making process. It is a legal requirement under planning law. The law states that the SA must comply with requirements of the European Strategic Environmental Assessment Directive.

Good practice guidance proposes a number of prescribed stages in the SA process, each of which links with stages of the plan-making process. It is important that the SA is able to feed into the plan-making process. This involves the ongoing appraisal of the plan and makes recommendations to help steer its direction to avoid potentially adverse consequences. This is particularly important when considering alternative strategy options. Consultation with statutory bodies (Natural England, Historic England and Environment Agency) and the public is also required at key stages.

Health Impact Assessment

The online National Planning Practice Guidance (NPPG) states that a health impact assessment may be a useful tool to use where there are expected to be significant impacts. The NHS London Healthy Urban Development Unit states that *'a health impact assessment (HIA) helps ensure that health and wellbeing are being properly considered in planning policies and proposals.'* Consequently, we are undertaking a high-level assessment of the possible health impacts of the Local Plan.

Equalities Impact Assessment

The Equality Act 2010 includes a public sector equality duty which requires public organisations and those delivering public functions to show due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation;
- Advance equality of opportunity; and
- Foster good relations between communities.

Consequently we are undertaking a high-level assessment of the possible equalities impacts of the Local Plan. This will be integrated into the IIA process.

Habitats Regulations Assessment

It is a legal requirement that any plan or programme likely to have a significant impact upon a European site protected for nature conservation, which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA). A HRA screening exercise is currently being undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a European protected site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England for approval. This is a parallel process to the IIA process and will be reported separately. It is noted that the full findings will be published with the next iteration of Local Plan and the Final IIA Report.

Scope of the Appraisal

The scope of the IIA was determined through collecting information on the environmental, social and economic characteristics of the area. This enabled key issues, opportunities and trends to be identified. A review of other relevant environmental protection objectives and policies was also undertaken. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered in the IIA and the Local Plan. The scope of the appraisal was documented in a Scoping Report, issued for consultation with the statutory bodies and the public in September 2015.

Following the consultation, responses were analysed and amendments made to the scope as appropriate. A finalised Scoping Report has been published and is available on OPDC's website.

Individual components of the Local Plan have been assessed to determine their sustainability performance and to provide recommendations for sustainability improvements. The following elements have been assessed:

- The Local Plan's Spatial vision;
- The Local Plan's Strategic Objectives; and
- The Local Plan's Preferred Policies and Policy Options.

The SA process is iterative, with regular feedback occurring between the plan-makers and the SA team as plan options and policies are developed.

Key Sustainability Issues and Opportunities

To ensure that a robust assessment of the emerging Local Plan is undertaken, it is necessary to understand the existing conditions and characteristics of the borough, for example, population dynamics, levels of deprivation, health, employment patterns and the condition of housing stock and its affordability. These are detailed in the IIA Report. The lists below identifies the sustainability topics covered in the IIA. Details of the identified issues and opportunities are provided in the IIA Report.

- Population: demographics and implications for service provision and housing.
- Education and qualifications: levels of attainment and implications of development on school places; gap between skills and suitable job availability.
- Human health: potential implications of opportunities for health improvements for quality of life and the economy.
- Crime: deprivation in relation to crime levels and potential opportunities for design measures.
- Water: river water quality; drainage; wastewater capacity; flood risk; and water efficiency/water sensitive design.
- Soil and land quality: contaminated land and the need for remediation.
- Air quality: existing air quality and opportunities/implications for construction practices and changes in land use.

- Climatic factors and energy: energy consumption and energy efficiency; and renewable/low carbon energy.
- Biodiversity: designated and important sites and protected species; potential impacts and opportunities to promote environmental improvements.
- Cultural Heritage: cultural heritage resource of the borough and consideration of the wider historic landscape including non-designated heritage and archaeological resources.
- Landscape and townscape: townscape character and green areas; access to and awareness of valued aspects and potential for improve design and legibility.
- Waste: recycling and composting rates; existing waste sites; sustainable waste management opportunities and waste apportionment/potential displacement.
- Transportation: accessibility and connectivity; congestion; opportunities for more sustainable modes of transport and improved connectivity.
- Noise: road and rail noise; opportunities to minimise effects.
- Local economy: local business characterisation; unemployment; infrastructure requirements and town centres; potential for employment and training, business opportunities and infrastructure capacity.
- Deprivation and Living Environment: high levels of deprivation and potential for improvements.
- Housing: housing tenure characteristics; housing needs; gypsy and traveller accommodation needs; opportunities for provision of a range of types and tenures.

IIA Framework for Assessment

The IIA Framework underpins the assessment methodology and comprises a series of sustainability objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. The IIA Objectives have been developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issue and opportunities. The IIA Framework was amended following receipt of the Scoping Report consultation responses from statutory consultees in 2015. The following Objectives form the basis of the IIA Framework. These are supported by a series of sub-objectives, indicators and targets, which can be found in the Draft IIA Report (**Table 3-4**):

- 1 To enhance the built environment and encourage 'place-making'
- 2 To optimise the efficient use of land through increased development densities and building heights, where appropriate
- 3 Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land
- 4 Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network
- 5 Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs
- 6 Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect
- 7 To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy
- 8 To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste
- 9 Improve the quality of the water environment
- 10 Create and enhance biodiversity and the diversity of habitats across the area and its surroundings
- 11 To minimise air, noise and light pollution, particularly for vulnerable groups
- 12 To conserve and enhance the historic environment, heritage assets and their settings
- 13 Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare
- 14 Improve safety and reduce crime and the fear of crime
- 15 Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living

- 16 To improve the education and skills levels of all members of the population, particularly vulnerable groups
- 17 Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training
- 18 To encourage inward investment alongside investment within existing communities, to create sustainable economic growth

Developing and Refining Options and Assessing Effects

Strategic Options

Government guidance advises that only realistic and relevant alternatives should be considered and they should be sufficiently distinct to enable a meaningful comparison of their different environmental effects.

Good practice guidance recommends that the key aims and principles of the plan should be assessed against the IIA Objectives, in order to test their compatibility and to determine whether they accord with broad sustainability principles. The spatial strategy options were assessed ahead of the drafting of the Regulation 18 Local Plan, as they form the basis of the approach within the area.. The assessment of the strategic options is presented in Chapter 5 of this Draft IIA Report.

The Spatial vision for OPDC has been reviewed against the IIA Objectives, and a summary of the key strengths, weaknesses and recommendations are presented in Chapter 6 of the IIA Report. The assessment of the Strategic Objectives of the Local Plan against the IIA Objectives has been undertaken during the IIA using a simple matrix based approach. Chapter 6 of the IIA Report presents the complete compatibility of the Spatial Objectives against the IIA Objectives.

Appraisal of Local Plan Policies and Options

The Local Plan policies and policy options for development were assessed against the IIA Objectives using a matrix based approach. This matrix allowed the identification of positive and negative impacts, as well as the potential for cumulative effects to occur. Mitigation measures and recommendations were suggested to offset or alleviate any predicted adverse impacts, or to enhance any opportunities that were identified.

A summary of the assessment of this is provided in Chapter 7 of the IIA Report. The complete results of the assessment are presented in Appendix G.

In summary, the majority of predicted effects were positive. The assessment led to the prediction of major positive effects against all of IIA Objectives.

Next Steps

This Draft IIA Report has now been issued for consultation alongside the Regulation 18 Local Plan to all key stakeholders (including statutory consultees and the public) for comment. The Regulation 18 Local Plan along with this accompanying IIA Report and associated appendices will be consulted on for eight weeks. Following the close of the consultation period, OPDC will review the feedback and revise the Plan as appropriate. The IIA Report will then be updated to reflect the assessment of these amendments or additions prior to the Regulation 19 Local Plan being published. The IIA Report will also include aspects relating to the SA process, such as a draft Monitoring Framework, as outlined in **Table 2-1** of this report. The next consultation on the IIA Report will be undertaken alongside the consultation on the Regulation 19 Local Plan.

If you would like to comment on this Draft IIA Report, please send comments to:

localplan@opdc.london.gov.uk

or

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Abbreviations

AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CIL	Community Infrastructure Levy
cSAC	Candidate Special Area of Conservation
DECC	Department of Energy and Climate Change
EqlA	Equalities Impact Assessment
GLA	Greater London Authority
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
HUDU	NHS London Health Urban Development Unit
IIA	Integrated Impact Assessment
LNR	Local Nature Reserves
LSDC	The London Sustainable Development Commission
LSOA	Lower Super Output Area
NNR	National Nature Reserves
NPPG	National Planning Policy Guidance
NVQ	National Vocational Qualification
ONS	Office for National Statistics
OPDC	The Old Oak and Park Royal Development Corporation
OPDM	The Office of the Deputy Prime Minister's
ppha	persons per hectare
pSPA	Potential Special Protection Areas
RIGS	Regionally Important Geodiversity Sites
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAM	Scheduled Ancient Monument
SCI	Sites of Community Importance
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SINC	Sites of Importance for Nature Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
WCED	World Commission on Environment and Development

1 Introduction

1.1 Purpose of the Draft IIA Report

The Old Oak and Park Royal Development Corporation (OPDC) is currently consulting on the Regulation 18 Local Plan. This Draft IIA Report has been prepared by Arcadis Consulting UK Ltd. (formerly Hyder Consulting (UK) Ltd.) on behalf of the OPDC, as part of the combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), incorporating Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) (hereinafter referred to as the Integrated Impact Assessment (IIA)) of the emerging Local Plan. Habitats Regulations Assessment Screening will also be undertaken as a parallel process, the findings of which will be integrated into the IIA as appropriate.

As a Local Planning Authority, the OPDC has a duty to prepare a Local Plan that sets its strategy for development within its area and the policies that will be used to direct development and determine applications for planning permission across the entire OPDC area.

The SA process commenced with a Scoping consultation, in September 2015. The SEA Directive requires the authority preparing the plan to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). In addition to the Consultation Bodies, a public consultation was undertaken. The preparation of a Scoping Report provides the most effective means of undertaking this consultation by providing the consultees with a document upon which they can make comments. Consultation responses as a result of this consultation have been integrated into this report and are documented in **Appendix E**.

This Draft IIA Report is intended to document the assessment of the Regulation 18 Local Plan, which sets out preferred policy direction for the OPDC area. It is noted, therefore, that the assessment of the preferred policy options is not final, and, along with the public consultation on the Regulation 18 Local Plan which this Draft IIA Report accompanies, seeks to inform the development of the next stage of the Local Plan, and comprises a non-statutory stage for SA public consultation. It is noted that the version of the Regulation 18 Local Plan assessed is dated 15th December 2015. Any changes to the text following this date, have not been considered.

1.2 The Local Plan

Launched on 1 April 2015, the OPDC has been established by the Mayor of London, to take on powers of planning, regeneration, compulsory purchase orders and the ability to adopt and manage streets and space in the area covered by the emerging Old Oak and Park Royal Opportunity Area Planning Framework (OAPF). This new Local Planning Authority spans parts of the London Boroughs of Brent, Ealing and Hammersmith and Fulham and therefore takes on planning powers in the areas of these authorities that it covers. The OPDC boundary, including its relationship to its three constituent boroughs, is shown in **Figure 1-1**.

The OPDC's purpose is to *'use the once-in-a-lifetime opportunity of investment in HS2 and Crossrail, to develop an exemplar community and new centre in north-west London, creating opportunities for local people and driving innovation and growth in London and the UK'*¹.

The OPDC is a functional body of the Greater London Authority (GLA), working closely with a number of organisations including the Mayor of London, the GLA, Transport for London, central government, the local Boroughs of Brent, Ealing and Hammersmith & Fulham, residents in neighbouring local communities, local organisations, businesses, landowners, developers and regeneration agencies.

As a Local Planning Authority, the OPDC has a duty to prepare a Local Plan that sets its strategy for development within its area and the policies that will be used to direct development and determine applications for planning permission across the entire OPDC area. The plan period will be to 2037.

¹ <https://www.london.gov.uk/priorities/planning/old-oak-park-royal>

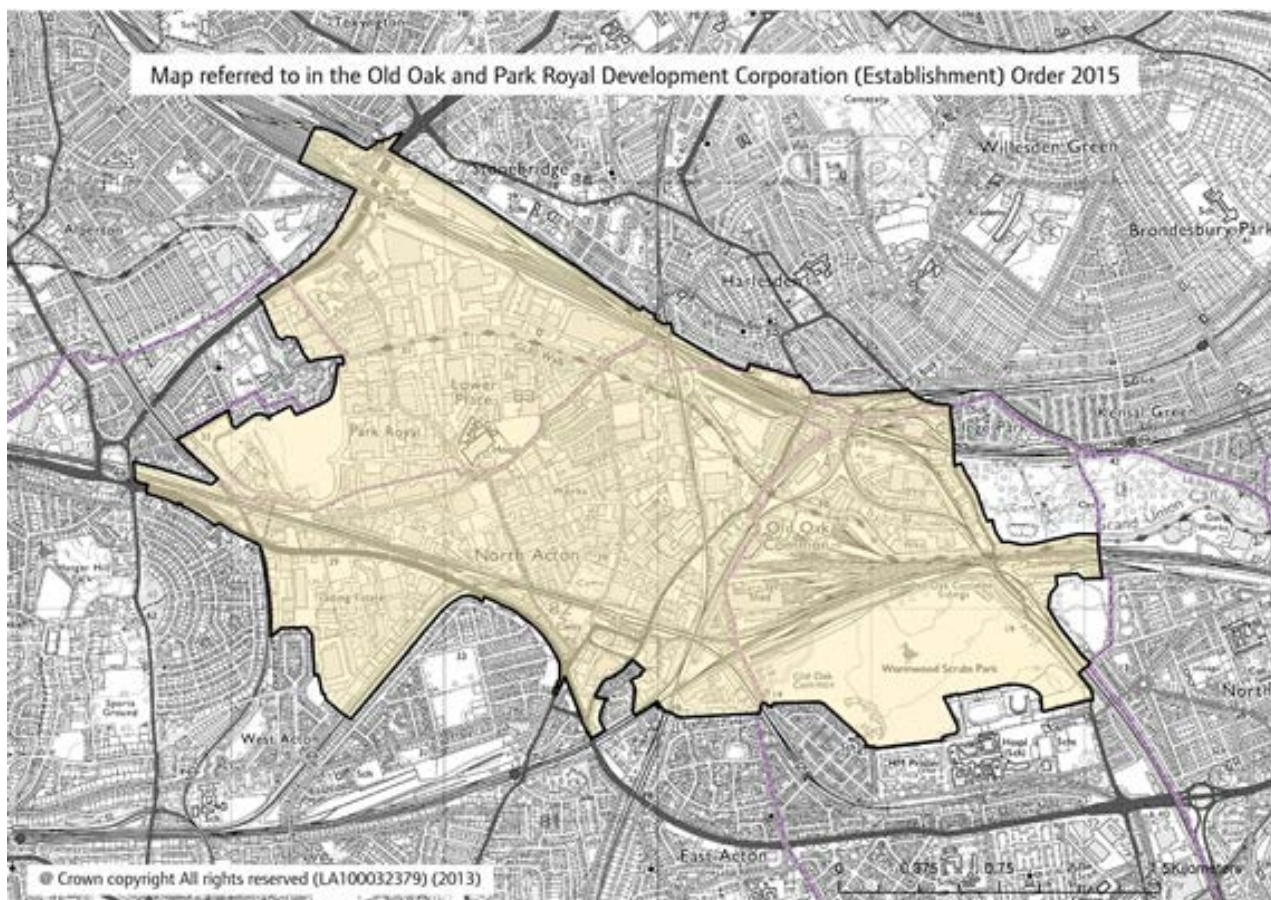
Until the OPDC adopts its own Local Plan for the OPDC area, the Boroughs' Local Plans will apply to the areas that they cover. **Figure 1-1** shows the areas covered the three constituent Local Authorities of the London Borough of Brent; the London Borough of Ealing; and the London Borough of Hammersmith and Fulham.

1.3 The London Plan and Opportunity Area Planning Framework

The London Plan is the overall strategic plan for London, and forms part of the development plan for the OPDC. The London Plan sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036. London boroughs' Local Plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the Mayor.

The Opportunity Area Planning Framework for Old Oak and Park Royal provides supplementary guidance to the London Plan to help to shape the regeneration of Old Oak and enhancement of Park Royal. This was adopted by the Mayor of London on 4 November 2015.

Figure 1-1 OPDC Boundary



1.4 Sustainable Development

The concept of sustainable development is central to the planning system. The term 'sustainable development' has been used since 1987 following the publication of the World Commission on Environment and Development (WCED) report 'Our Common Future' (The Brundtland Report). It called for a strategic that united development and the environment, and defined 'sustainable development' as:

'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'

The UK Government has produced a Sustainable Development Strategy, 'Securing the Future' (March 2005). Priority areas for immediate action are outlined as:

- Sustainable consumption and production;

- Climate change and energy;
- Natural resource protection and environmental enhancement; and
- Sustainable communities.

To achieve forms of development that are more sustainable than previous development, proposals must strike an acceptable balance between maximising resource and energy efficiency; minimising environmental impacts; delivering social benefits; and supporting a healthy economy. The London Sustainable Development Commission (LSDC) provides advice to the mayor to help make London more sustainable as it continues to develop and grow. The priorities of LSDC are as follows:

- **London Infrastructure Plan 2050:** The Mayor has asked the Commission to advise on the London Infrastructure Plan 2050. The LSDC Chair is a member of the Infrastructure Delivery Board.
- **Circular Economy:** The LSDC sees waste as an opportunity to create new jobs and industries. This is why it's exploring ways to support London's move to a circular economy. In such an economy, waste is no longer considered just rubbish, but a resource of raw materials that has value.
- **Energy:** The LSDC will be exploring a range of issues around energy in the capital. This includes energy efficiency, and decentralised energy, meaning energy which is produced close to where it's used. The Commission will also look at how Londoners can overcome barriers to solar panel uptake in the capital. Progress here could also achieve greater investment in community infrastructure projects.
- **Green Economy:** The LSDC has made recommendations on ways to speed up the growth of London's low carbon goods and services sector. It is now helping to determine how these measures might be achieved. The LSDC is also helping to raise the capital's profile as a centre for 'cleantech' – technology which is environmentally friendly.

Relevant national and London based guidance has been considered and adhered to as part of this IIA. Where relevant, this has been referenced and reflected in the review of PPPs and the IIA Framework in Chapter 6.

1.5 Integrated Impact Assessment

The term Integrated Impact Assessment (IIA) can be used to describe the process of covering more than one type of impact assessment into a single process. Integrating different types of impact assessment into a single process can improve efficiencies in both the assessment itself, as many of the issues covered in the different forms of assessment overlap, as well as simplifying outcomes and recommendations for policy makers. Where more detail on certain issues is required or necessary, this can be undertaken and included within the IIA. This approach has been adopted by the Mayor of London, who has taken an integrated approach to assessing the impacts of his strategies, incorporating the requirements of SEA, SA, HIA, and EqIA. This IIA draws together the following impact assessments:

- Sustainability Appraisal and Strategic Environmental Assessment;
- Health Impact Assessment;
- Equalities Impact Assessment; and
- Habitats Regulations Assessment (HRA Screening will be undertaken as a parallel process, the findings of which will be integrated into the IIA as appropriate).

The following text provides further detail of each of the component impact assessments in turn. Section 3 provides further detail about how the assessment processes will be integrated.

1.6 Sustainability Appraisal and Strategic Environmental Assessment

SA is a process for assessing the social, economic, and environmental impacts of a plan and aims to ensure that sustainable development is at the heart of the plan-making process.

It is a legal requirement that Local Plans are subject to SA, under the Planning and Compulsory Purchase Act 2004. This Act stipulates that the SA must comply with the requirements of the SEA Directive which was transposed directly into UK law through the SEA Regulations.

SEA is a systemic process for evaluating the environmental consequences of plans and programmes to ensure that environmental issues are integrated and assessed at the earliest opportunity in the decision-making process. Article 1 of the SEA Directive states that the aim is to:

'Provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.'

It is possible to combine the processes of SEA and SA, as they share a number of similarities. National Planning Policy Guidance (NPPG) promotes a combined process (i.e. a process which assesses social, economic and environmental effects) and this is the approach that has been adopted here. Whilst there are formalised approaches for both SA and SEA, only SEA has a legal obligation to perform certain activities. These legal obligations have been and will continue to be adhered to throughout the Integrated Impact Assessment for the new Local Plan. This Scoping Report includes a series of boxes which clearly identify the specific requirements of the SEA Directive that need to be fulfilled.

1.7 Health Impact Assessment

The online National Planning Practice Guidance (NPPG)² states that:

'Local planning authorities should ensure that health and wellbeing, and health infrastructure, are considered in local and neighbourhood plans and in planning decision making...A health impact assessment may be a useful tool to use where there are expected to be significant impacts.'

According to the NHS London Healthy Urban Development Unit:

'A health impact assessment (HIA) helps ensure that health and wellbeing are being properly considered in planning policies and proposals.'

Consequently, we are undertaking a high-level assessment of the possible health impacts of the Local Plan. As the OPDC is a pioneer for having public health expertise based within its core team, they have already ensured that public health expertise is, and will be, provided by the Local Authorities, Transport for London, GLA Health Team and Public Health England, as well as from OPDC Health Advisor. This will be integrated into the IIA process. Further details on the scope of the assessment and how the processes will be integrated can be found in Sections 2 and 3 of this report.

1.8 Equalities Impact Assessment

The Equality Act 2010 includes a public sector equality duty which requires public organisations and those delivering public functions to show due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation;
- Advance equality of opportunity; and
- Foster good relations between communities.

Consequently we are undertaking a high-level assessment of the possible equalities impacts of the Local Plan. This will be integrated into the IIA process. Further details on the scope of the assessment and how the processes will be integrated can be found in Sections 2 and 3 of this report.

1.9 Habitats Regulations Assessment

European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC) and Special Protection Area (SPA), which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA). In addition it is a matter of law that candidate SACs (cSACs), Sites of Community Importance (SCI), Ramsar sites and potential SPAs (pSPAs) are also considered in this process.

² <http://planningguidance.planningportal.gov.uk/blog/guidance/health-and-wellbeing/what-is-the-role-of-health-and-wellbeing-in-planning/>

A HRA screening exercise is currently being undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England for approval.

This is a parallel process to the IIA process and will be reported separately. However, its findings will be relevant to the IIA and *vice versa* so the two processes will need to interact. The NPPG³ states that, '*the sustainability appraisal should take account of the findings of a Habitats Regulations Assessment, if one is undertaken.*' The findings of the HRA screening exercise have been considered in this Draft IIA Report where relevant. However, it is noted that the full findings will be published with the next iteration of Local Plan and the Final IIA Report.

1.10 Consultation

1.10.1 SA Workshop

A scoping workshop was held in July 2015 with attendees from a range of organisations including officers from: the GLA; Transport for London (TfL); OPDC; Historic England; the London Boroughs of Brent, Ealing, Hammersmith and Fulham and Kensington and Chelsea; Public Health England; and the Environment Agency. The findings of this workshop have contributed to this report. Further details of the specific findings of the workshop are provided in **Appendix A**.

1.10.2 Formal Consultation

In accordance with regulation 12(5) of the SEA Regulations, the Scoping Report was consulted upon for a five week period, commencing in September 2015. The statutory SEA bodies consulted were:

- Natural England;
- Historic England; and,
- The Environment Agency.

The Scoping Report was made available for comment on OPDC's website for the general public and other stakeholders during the consultation period, as well as being sent directly to the IIA Workshop attendees (see **Appendix A**). Comments received have been integrated into this Draft IIA Report, and are documented in **Appendix E**.

1.10.3 Additional Consultation

An important element of the IIA, HIA and EqIA in particular, is to engage the community throughout the development of the Local Plan. OPDC officers have met with community groups prior to the Regulation 18 consultation and will continue to do so during and after the formal consultation period.

1.11 Structure of this Draft IIA Report

This Draft IIA Report provides a summary of the IIA process so far and documents the findings and recommendations of the assessment. It will be used as a consultation document and issued to statutory bodies and stakeholders for comment alongside the Regulation 18 Local Plan. It will also be made available to the public.

It is essential that this Draft IIA Report is read alongside the OPDC Regulation 18 Draft Local Plan.

³ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

2 The IIA Process

2.1 Stages in the IIA Process

The Office of the Deputy Prime Minister's (ODPM) Practical Guide⁴ as well as NPPG (March 2014), provide guidance on conducting an SA. This will be followed for the purposes of the IIA. The five main stages in conducting an SA are defined as:

- Stage A - setting the context and objectives, establishing the baseline and deciding on the scope;
- Stage B - developing and refining options and assessing effects;
- Stage C - preparing the Sustainability Appraisal Report;
- Stage D - consulting on the preferred option of the development plan and SA Report; and
- Stage E - monitoring significant effects of implementing the development plan.

Table 2-1 presents the key stages in the SA process. This Draft IIA Report documents the findings of Stages A and B. However, it is noted that further assessment within Stage B of the process for refining options is likely to be required for the next iteration of the Local Plan. The table also demonstrates how each of the SA (including SEA), HIA, EqIA and HRA assessment processes and stages are linked to each other, as well as to the preparation and development of the Local Plan.

⁴ ODPM (2005) A Practical Guide to the SEA Directive

Table 2-1 Stages in the IIA Process

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in this Draft IIA Report	
Determining the scope of the Local Plan including specifying the opportunities or issues the authority wants to solve	A. Setting the context and objectives, establishing the baseline and deciding on the scope	Identify related plans/programmes		Identify health related plans/programmes (as part of SA) linked into local Joint Strategic Needs Assessments	Review of relevant policies and strategies	Chapter 3 and Appendix B
		Identify environmental protection objectives		Derivation of health - related themes	Derivation of equality-related themes	Chapter 3 and Appendix B
		Baseline data and likely future trends	Identify all European sites within and up to 20km from the OPDC area	Gather baseline data relating to health (as part of SA)	Baseline data and likely future trends	Chapter 3 and Appendix C
		Identify sustainability issues and opportunities	Contact Natural England for details of all European sites (including conservation objectives) and consultation purposes	Identify health specific issues and relevant health determinants using the London Healthy Urban Development Unit tool (as part of SA)	Identify equalities specific issues	Chapter 3
		Develop objectives, indicators and targets (Assessment Framework)	Liaise with SA team to ensure the Assessment Framework covers European sites appropriately	Ensure inclusion of health specific objectives, indicators and targets in SA Assessment Framework	Ensure inclusion of equalities specific objectives, indicators and targets in SA Assessment Framework	Chapter 3 and Appendix D
		Prepare SA Scoping Report, incorporating HRA and HIA	HRA information incorporated in SA Scoping Report	HIA information incorporated in SA Scoping Report.	EqIA information incorporated in SA Scoping Report.	Chapter 3
		Consult on the scope of the SA including HIA,	<i>Consultation as part of SA Scoping Report consultation</i>	<i>Consultation as part of SA Scoping Report consultation.</i>	<i>Consultation as part of SA Scoping Report consultation.</i>	Chapter 3, Appendix A and Appendix E

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in this Draft IIA Report	
	EqlA and HRA (5 weeks)	<i>including consultation with Natural England</i>				
	Review of scoping consultation responses and preparation of Final Scoping Report to inform next stage.					Appendix E
Generating options and preferred options for the strategy and implementation plan to resolve these challenges; appraising the options and predicting their effects (Regulation 18 Local Plan)	B1/B2. Developing, refining and appraising strategic options, policy options and preferred policy options.	Assess objectives against the Assessment Framework		HIA effects evaluated through SA Framework – including mitigation	EqlA effects evaluated through SA Framework	Chapter 6
		Develop, refine and appraise strategic options	Consider HRA implications of the options.		Screening exercise of proposed strategic options	Chapter 5 and Chapter 7
		Evaluate/select preferred policy options				Chapter 7
	C. Prepare Initial SA Report					This report
Consultation on Local Plan (Regulation 18)	Consultation on Initial SA Report (non-statutory)					This report
	Review of consultation responses and necessary actions to inform next stage					Stage to be completed
Selecting finalised preferred policy options for the strategy and implementation plan and deciding priorities	B3/B4. Assessing the effects of the Local Plan Preferred Options	Predict and assess effects of options taken forward		HIA effects evaluated through SA Framework – including mitigation	EqlA effects evaluated through SA Framework	Stage to be completed
		Proposed mitigation measures				Stage to be completed
		Propose monitoring programme	Monitoring as part of SA	Monitoring as part of SA	Monitoring as part of SA	Stage to be completed
Production of the Draft Local	C. Prepare SA Report		HRA Screening of draft Local Plan.	HIA documented in SA Report	EqlA documented in SA Report	Stage to be completed

Old oak and park royal development corporation Regulation 18 DRAFT local plan

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in this Draft IIA Report
Plan			HRA Screening Report produced separately and <i>sent to Natural England for agreement of findings.</i>			
Consultation of Draft Local Plan (Regulation 19)	D. Consultation on the SA Report		As above.	<i>HIA Consultation included in SA Report consultation</i>	<i>EqIA Consultation included in SA Report consultation</i>	Stage to be completed
Production of Final Local Plan	D. Prepare a supplementary or revised SA Report if necessary	Assess significant changes	Prepare updated HRA Report following Natural England comments (if necessary).	HIA assessment of significant changes undertaken as part of SA and options around mitigation or reduction of effect identified	EqIA assessment of significant changes undertaken as part of SA	Stage to be completed
		Prepare supplementary or revised SA Report				Stage to be completed
Adoption of Local Plan	D. SA Statement					Stage to be completed

3 Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on the Scope

3.1 Introduction

The following section describes Stage A of the SA process, as documented in the Scoping Report. Consultation comments from the Scoping Report consultation in September 2015 are reflected here, as documented in **Appendices A and E**.

3.2 Spatial Scope

The proposed study area for the IIA of the Local Plan, in general, is shown in **Figure 1-1**. However, as discussed at the Scoping Workshop, some effects, particularly in relation to health and employment and skills, will likely extend beyond this boundary. Studies in relation to the effects on local populations in the neighbouring areas to the OPDC boundary are currently ongoing. Relevant data collated as part of these studies will be integrated into the IIA process when available. Further data may also be collated when further information is available about the policies and the proposals of the Local Plan. It may then be necessary to collate more baseline data to enable the assessment of the effects of the Local Plan beyond its boundaries.

3.2.1 Aspects of the Local Plan to be assessed and how

The framework of policies and proposals contained within the Local Plan will seek to regulate and control the development and use of land and to provide the basis for consistent and transparent decision making on individual planning applications. As options emerge, each of its components will be assessed to determine sustainability performance and to provide recommendations for sustainability improvements. The Local Plan includes policies and proposals, grouped under the following headings:

1. Spatial vision and Objectives
2. The Overarching Spatial Policies
3. The Places
4. Sustainable development
5. Design
6. Housing
7. Employment
8. Town Centre Uses
9. Social Infrastructure
10. Transport
11. Environment and Utilities

The Delivery and Implementation Chapter has not been assessed as this provides delivery information for how the spatial vision, objectives and policy options will be implemented can would repeat the assessment undertaken for these sections.

The intention is to ensure that the process is iterative while maintaining an independent assessment with regular feedback occurring between the plan-makers and the IIA team, as options are developed.

The method adopted to assess each element of the plan has been slightly different, for example, the spatial vision has been subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise has been used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives.

However, a more detailed assessment of the policy options and alternatives has been undertaken using an assessment matrix.

Assessment of Alternatives

It is a requirement of the SEA Directive that 'reasonable alternatives' are assessed and, therefore, alternative options have been assessed using the IIA Framework. In accordance with NPPG:

'The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.'

Alternatives must be realistic and are likely to emerge from the plan-making process. However, the SEA can encourage further thinking around alternatives, and highlight where environmentally preferable options exist. Alternatives have been a focus for several legal challenges within the UK, and so it is important to ensure reasonable alternatives are meaningfully considered. If there are genuinely no reasonable alternatives to a plan, alternatives should not be artificially generated.

Overarching strategic options were assessed ahead of the drafting of the Local Plan. The purpose of the assessment has been to determine the sustainability strengths and weaknesses of each option, such that this information can be used by the plan-makers to develop the plan's policy options and preferred policies. The preferred policies and policy options were then assessed alongside one another in detail, which enables a comparison of their predicted sustainability effects, to inform the development of the preferred policies, which will be published at the next stage of the Local Plan's development. A matrix has been used for this assessment that enables the policies and options to be easily compared.

The types of alternative options reviewed have included:

- Strategic Spatial Strategy Options; and
- Strategic policy options and preferred policy options.

This report documents the first part of Stage B of the SEA process alongside Stage A. This Draft IIA Report, is being published with the Regulation 18 version of the draft Local Plan.

3.3 Temporal Scope

The Local Plan will set out policies for the period to 2037. This will be used as the temporal scale for the IIA. This will help to identify whether effects are likely to be permanent (i.e. irreversible at least through the lifetime of the proposed measure/scheme) or temporary.

3.4 Technical Scope

3.4.1 SEA

The SEA Directive and the SEA Regulations require that the 'likely significant' effects on the environment are assessed, considering the following factors and interrelationship between them:

- Biodiversity;
- Population;
- Human health;
- Fauna and flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage including architectural and archaeological heritage; and
- Landscape.

The above topics therefore form the technical scope of the SEA.

3.4.2 HIA

The NHS London Health Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool Framework (January 2013)⁵ guidance lists the following health determinants, to be considered as a part of an assessment into health impacts:

1. Housing quality and design;
2. Access to healthcare services and other social infrastructure;
3. Access to open space and nature;
4. Air quality, noise and neighbourhood amenity;
5. Accessibility and active travel;
6. Crime reduction and community safety;
7. Access to healthy food;
8. Access to work and training;
9. Social cohesion and lifetime neighbourhoods;
10. Minimising the use of resources; and
11. Climate change.

The HIA elements of the IIA will therefore seek to assess the Local Plan in terms of its effects on the health of the local community, with wider effects being considered where relevant. This might include communities in the surrounding area, incoming residents and people coming in for work, visiting or just travelling through. This will encompass the determinants described above, where they relate to land use planning. There will be work developed around mitigating issues that impact negatively on health – physical, mental and emotional.

Within the assessment process, the HIA has been integrated throughout the IIA Framework (see section 3), with health, and impact on health, being considered under all relevant objectives. Most notably, however, the ‘human health’ topic of SEA will be expanded upon, to ensure that relevant baseline data, key sustainability issues and opportunities, objectives and mitigation is identified. **Table 2-1** provides further information on how the HIA process will integrate with the IIA process.

3.4.3 EqIA

⁵ <http://www.healthyrbandevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Rapid-HIA-Tool-Jan-2013-Final.pdf>

The EqIA process is designed to ensure that projects, policies and practices do not discriminate or disadvantage people and also to enable consideration of how equality can be improved or promoted. The EqIA will consider the impact of a proposal on relevant groups who share characteristics which are protected under the Equality Act (age, disability, race, faith, gender (including gender reassignment), sexual orientation, pregnancy and maternity, marriage and civil partnership) as well as others considered to be vulnerable within society such as low income groups.

This Draft IIA Report, which integrates the requirements of EqIA, sets out the matters that have been identified as relevant for consideration in the EqIA. The EqIA seeks to identify those groups that may be affected by the proposals, to analyse what the equality impacts are, and what measures are to be applied to policy to minimise or eliminate the adverse impacts. Within the assessment process, the EqIA will be integrated throughout the IIA Framework (see section 3.7), with equalities issues being considered under all relevant objectives. **Table 2-1** provides further information on how the EqIA process will integrate with the IIA process.

3.4.4 HRA

Within the OPDC area there are no internationally designated SACs, SPAs or Ramsar sites. The closest to the site are listed in **Table 2-1**. A HRA screening exercise will be undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England for approval. This is a parallel process to the IIA process and will be reported separately.

Table 2-1 Statutory sites of international nature importance within 20km of the OPDC area

Name of Site	Identification Number	Designation	Approximate distance from OPDC boundary
Richmond Park	UK0030246	SAC	7.3km south
Wimbledon Common	UK0030301	SAC	8.3km south
Lee Valley	UK9012111	SPA	14.3km north-east
Lee Valley	UK11034	Ramsar Site	14.3km north-east
South West London Waterbodies	UK9012171	SPA	16.3km south-west
South West London Waterbodies	UK11065	Ramsar Site	16.3km south-west
Epping Forest	UK0012720	SAC	17.8km north-east

3.5 Review of Relevant Plans, Programmes and Environmental Objectives

3.5.1 Introduction

The box below stipulates the SEA Directive requirements for this stage of the process.

Box 1: SEA Directive Requirements for the Review of Plans Programmes and Environmental Protection Objectives

'an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmers' (Annex 1 (a)).

'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation' (Annex 1 (e))

A review of other plans and programmes that may affect the preparation of the Local Plan was undertaken in order to contribute to the development of both the IIA and the Local Plan. This included:

- Identification of any external social, environmental or economic objectives, indicators or targets that should be reflected in the IIA process.
- Identification of any baseline data relevant to the IIA.
- Identification of any external factors that might influence the preparation of the plan, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the Local Plan.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the Local Plan.

The review included documents prepared at international, national, regional and local scale. A brief summary of the documents reviewed and the main findings are summarised in **Tables 3-1 and 3-2**. Further details are presented in **Appendix B**.

Table 3-1 Review of Plans, Policies and Programmes

Plan, Policy or Programme	Directly Relevant Process
International / European	
European Directive 2001/42/EC (SEA Directive)	SEA
European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats	HRA, SEA
European Directive: Environmental Noise Directive 2002/49/EC	SEA, HIA, EqIA
EU Directive on Ambient Air Quality and Management 96/62/EC	SEA, HIA, EqIA
Water Framework Directive 2000/60/EC	SEA
Waste Framework Directive 2008/98/EC	SEA
Urban Waste Water Treatment Directive 91/271/EEC	SEA, HIA
Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC	SEA
Health for Growth 2014-2020, European Commission, 2011	HIA, SEA
European Convention on the Protection of the Archaeological Heritage (revised), 1992	SEA
European Landscape Charter 2000	SEA
National	

Plan, Policy or Programme	Directly Relevant Process
Greater London Authority Act 1999	HIA, EqIA
Equality Act 2010	HIA, EqIA
Wildlife and Countryside Act 1981	HRA
Flood and Water Management Act 2010	SEA, HIA
Energy Act 2013	SEA
Climate Change Act 2008	SEA, HIA, EqIA
Planning (Listed Building and Conservation Areas) Act 1990	SEA
Ancient Monuments and Archaeological Areas Act 1979	SEA
UK Climate Change Programme 2006	SEA, HIA, EqIA
National Planning Policy Framework, Department for Communities and Local Government, March 2012	SEA, HIA, EqIA
National Planning Policy for Waste, October 2014	SEA, HIA, EqIA
Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015	SEA, EqIA
The UK Government Sustainable Development Strategy, HM Government, 2005	SEA, HIA, EqIA
The UK Low Carbon Transition Plan, HM Government, July 2009	SEA
The Carbon Plan, HM Government, December 2011	SEA
UK Renewable Energy Strategy, HM Government, 2009	SEA
Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011	SEA, HIA
UK Post-2010 Biodiversity Framework, Joint Nature Conservation Committee and Department for Environment, Food and Rural Affairs, 2012	SEA
White Paper: Healthy Lives, Healthy People: our strategy for Public Health in England, Department for Health, June 2011	SEA, HIA, EqIA
UK Air Quality Strategy, Department for Environment, Food and Rural Affairs, 2011	SEA, HIA, EqIA
Noise Policy Statement for England, Department for Environment, Food and Rural Affairs, March 2010	SEA, HIA, EqIA
Policy statement: Planning for schools development, Department for Communities and Local Government, August 2011	SEA, EqIA
Written Ministerial Statement: Sustainable Drainage Systems, December 2014	SEA, HIA, EqIA

Plan, Policy or Programme	Directly Relevant Process
Regional / London	
The London Plan: Spatial Development Strategy for Greater London, Greater London Authority, July 2011	SEA, HIA, EqIA
Revised Early Minor Alterations to the London Plan, Greater London Authority, October 2013	SEA, HIA, EqIA
Further Alterations to the London Plan, Greater London Authority, March 2015	SEA, HIA, EqIA
Draft Minor Alterations to the London Plan 2015 – Housing Standards, and Parking Standards, Greater London Authority, May 2015	SEA, HIA, EqIA
Land for Industry and Transport Supplementary Planning Guidance, Greater London Authority, September 2012	SEA, HIA, EqIA
Green Infrastructure and Open Environments: The All London Green Grid, Supplementary Planning Guidance, Greater London Authority, March 2012	SEA, HIA, EqIA
London Infrastructure Plan 2050 update, March 2015	SEA, HIA, EqIA
London Plan Supplementary Planning Guidance on Housing, Greater London Authority, November 2012	SEA, HIA, EqIA
London Plan Social Infrastructure Supplementary Planning Guidance, May 2015	SEA, HIA, EqIA
London Plan Town Centres Supplementary Planning Guidance, July 2014	SEA, HIA, EqIA
London Plan Supplementary Planning Guidance, Sustainable Design and Construction, Greater London Authority, April 2014	SEA, HIA, EqIA
London Plan The Control of Dust and Emissions during Construction and Demolition SPG, July 2014	SEA, HIA, EqIA
London's Waste Resource: The Mayor's Municipal Waste Management Strategy, November 2011	SEA, HIA, EqIA
London Waste and Recycling Board Waste Management Planning Advice for New Flatted Properties, December 2014	SEA, HIA, EqIA
Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance, Greater London Authority, 2012	SEA, HIA, EqIA
Green Infrastructure and Open Environments: London's Foundations: Protecting the geodiversity of the capital: Supplementary Planning Guidance, Greater London Authority and London Geodiversity Partnership, March 2012	SEA
Securing London's Water Future, Greater London Authority, October 2011	SEA, HIA
The Mayor's Food Strategy: Healthy and Sustainable Food for London, London Development Agency, May 2006	SEA, HIA, EqIA
Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy, Greater London Authority, October 2011	SEA, HIA

Plan, Policy or Programme	Directly Relevant Process
Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaption Strategy, Greater London Authority, October 2011	SEA, HIA
Cultural Metropolis: The Mayor's Culture Strategy, Greater London Authority, November 2010 and Achievements and Next Steps, Greater London Authority, Greater London Authority, 2014	SEA, HIA, EqIA
The London Health Inequalities Strategy, Greater London Authority, April 2010	SEA, HIA, EqIA
Planning for Equality and Diversity in London: Supplementary Planning Guidance to the London Plan, Greater London Authority, October 2007	EqIA
River Basin Management Plan. Thames River Basin District, Environment Agency, December 2009	SEA
The Mayor's Economic Development Strategy for London, Greater London Authority, May 2010	SEA, EqIA
Mayor's Biodiversity Strategy: Connecting with London's Nature, Greater London Authority, July 2002	SEA, HRA, HIA
Improving Londoners Access to Nature: London Plan Implementation Report, Greater London Authority, February 2008	SEA, HIA
London Biodiversity Action Plan, London Biodiversity Partnership, 2001	SEA, HIA
Clearing the Air: The Mayor's Air Quality Strategy, Greater London Authority, December 2010	SEA, HIA
Sunder City: The Mayor's Ambient Noise Strategy, Greater London Authority, March 2004	SEA, HIA
London View Management Framework Supplementary Planning Guidance, Greater London Authority, March 2012	SEA
Mayor's Transport Strategy, Greater London Authority, May 2010	SEA, HIA, EqIA
The Mayor's Equality Framework: Equal Life Chance for All, Greater London Authority, 2009	EqIA
West London	
West London Joint Waste Plan to 2031: London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond Upon Thames, July 2015	SEA, HIA
West London Sub Regional Transport Plan, Transport for London, 2014 update	EqIA, SEA, HIA
Local	
Old Oak and Park Royal draft Opportunity Area Planning Framework, Greater London Authority, February 2015	SEA, HIA, EqIA
Brent	
London Borough of Brent Local Development Framework, Core Strategy, Brent Council, July 2010	SEA

Plan, Policy or Programme	Directly Relevant Process
Brent Parks Strategy 2010-2015, Brent Council, publication date unknown	SEA, HIA, EqIA
Food for Thought: A Food Growing and Allotments Strategy for the London Borough of Brent and Action Plan 2014/16, Brent Council, publication date unknown	SEA, HIA, EqIA
Draft Community Safety Strategy 2014-17, Safer Brent Partnership, publication date unknown	SEA, HIA, EqIA
Brent Equality Strategy 2015-19, Brent Council, April 2015	EqIA
Brent Health and Wellbeing Strategy 2014-17, Brent Council and NHS Brent, publication date unknown	SEA, HIA, EqIA
Cultural Strategy for Brent 2010-15, Brent Council, publication date unknown	EqIA
A Regeneration Strategy for Brent 2010-2030, Brent Council, publication date unknown	SEA, HIA, EqIA
A Plan for Children and Families in Brent 2012-15, Brent Council, publication date unknown	EqIA
Ealing	
The Development Strategy 2026: Ealing Core Strategy, Ealing Council, April 2012	SEA
Sustainable Community Strategy 2006-2016 Ealing Council, Refresh July 2011	SEA, HIA, EqIA
Ealing Quality of Life for Older People 2006-2016, Ealing Council, publication date unknown	HIA, EqIA
Arts and Cultural Strategy 2013-2018, Ealing Council, publication date unknown	SEA, EqIA
Ealing Green Space Strategy 2012-2017, Ealing Council, November 2012	EqIA, HIA, SEA
Park Royal Southern Gateway Position Statement, Final Draft, London Borough of Ealing, April 2008	SEA
Hammersmith and Fulham	
Hammersmith and Fulham Core Strategy, Hammersmith and Fulham Council, October 2011	SEA
Hammersmith and Fulham Housing Strategy: Delivering the change we need in housing, Hammersmith and Fulham Council, May 2015	EqIA, HIA, SEA
Hammersmith and Fulham Health and Wellbeing Strategy 2013-15, Hammersmith and Fulham Council, publication date unknown	EqIA, HIA, SEA
Parks and Open Spaces Strategy 2008-2018, Hammersmith and Fulham Council, July 2008	EqIA, HIA, SEA
Hammersmith and Fulham CSPAN Physical Activity Strategy 2011-2016, Hammersmith and Fulham Council, November 2011	EqIA, HIA, SEA
Updated Surface Water Management Plan 2015, Hammersmith and Fulham Council, April 2015	SEA, HIA

Plan, Policy or Programme	Directly Relevant Process
Contaminated Land Strategy, Hammersmith and Fulham Council, 2001	SEA
Kensington and Chelsea	
Consolidated Local Plan (July 2015)	EqIA, HIA, SEA
Surface Water Management Plan (SWMP, February 2014)	EqIA, HIA, SEA
Local Flood Risk Management Strategy (LFRMS, July 2015)	SEA
Issues and Options Paper for Kensal Gasworks (June 2012)	EqIA, HIA, SEA
St Quintin and Woodlands Draft Neighbourhood Plan (May 2015)	EqIA, HIA, SEA

3.5.2 Key Results from the Review

Environmental, social and economic objectives and issues identified in the review of plans, programmes and environmental protection objectives (PPPs) of relevance to the IIA were used to generate a series of common themes. Appendix B presents a summary of how the identification of common themes relates to each of the PPPs reviewed. How these themes relate to the relevant assessment processes is presented in **Table 3-2**. The results of this assessment have been used to inform the development of the draft IIA Framework. How the resulting draft Objectives relate to the identified themes is also shown in **Table 3-2**.

Table 3-2 Results of the review of Plans, Policies and Programmes

Common theme	Relevance to SEA, HIA, EqIA and HRA	Relevance to draft IIA Objective
Environmental		
Optimise the use of land through increasing the density of development	SEA: Soil, Material Assets, Population	2, 3, 4, 7, 17, 18
Promote sustainable design and mitigate and adapt to climate change	SEA: Human Health, Population, Climatic Factors, Material Assets; HIA; EqIA	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 15
Promote and protect the water environment including issues such as quality and resource use as well as reducing flood risk	SEA: Human Health, Population, Climatic Factors, Water, Material Assets; HIA; EqIA	3, 6, 7, 8, 9, 10, 15
Reduce greenhouse gas emissions, increase energy efficiency and promote the use of renewable energy and renewable technologies in appropriate locations	SEA: Climatic Factors, Air, Material Assets, Population	4, 6, 7, 8
Promote sensitive waste management	SEA: Material Assets, Climatic Factors, Population, Human Health, Soil, Landscape; HIA, EqIA	3, 7, 8, 9, 10, 11, 15
Protect and enhance the historic environment and recognise and appreciate landmarks, townscapes and their setting	SEA: Material Assets, Cultural Heritage, Population, Landscape	1, 2, 3, 5, 6, 7, 8, 12, 13, 18

Common theme	Relevance to SEA, HIA, EqIA and HRA	Relevance to draft IIA Objective
Conserve and enhance biodiversity as an integral part of economic, social and environmental development	HRA; SEA: Biodiversity, Flora, Fauna, Population, Material Assets, Climatic Factors, Soil, Water	1, 6, 9, 10, 11, 15, 18
Achieve more effective geo-conservation and improve soil quality	SEA: Soil, Climatic Factors, Human Health, Water, Landscape; HIA	2, 3, 6, 7, 8, 9, 10, 15
Improve air quality	SEA: Air, Climatic Factors, Human Health, Population, Material Assets; HIA, EqIA	4, 7, 8, 10, 22, 25, 17, 18
Minimise the adverse impacts of noise on people living and working in, and visiting the area	SEA: Population, Human Health, Material Assets; HIA; EqIA	1, 4, 5, 11, 15, 18
Social		
Improve health and well-being and promote greater levels of physical activity	SEA: Human Health, Population, Landscape; HIA; EqIA	1, 4, 7, 11, 13, 14, 15, 16, 17
To create an equal society which recognises people's different needs, situations and goals, and removes the barriers that limit what people can do and be	SEA: Human Health, Population; HIA; EqIA	13, 14, 15, 16, 17
Maximise the contribution that the arts, culture and heritage can make to the community	SEA: Population, Material Assets, Cultural Heritage; HIA; EqIA	1, 12, 13
The need to ensure that new housing development meets local and regional needs (for all sections of society)	SEA: Population, Human Health, Material Assets; HIA; EqIA	1, 5, 13, 14, 15
Promote more sustainable transport choices and to improve accessibility	SEA: Population, Human Health, Material Assets, Air, Noise, Climatic Factors; HIA; EqIA	1, 2, 4, 7, 11, 15, 17
Recognise the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life	SEA: Population, Human Health, Landscape, Material Assets; HIA; EqIA	1, 6, 12, 13, 14, 15
Improve educational attainment and training opportunities	SEA: Population, Human Health; HIA; EqIA	13, 14, 15, 16, 17, 18
Reduce crime and fear of crime	SEA: Population, Human Health; HIA; EqIA	1, 4, 13, 14, 15, 16, 17, 18
Economic		
Promote sustainable economic development and a range of employment opportunities	SEA: Population, Human Health, Material Assets; HIA; EqIA	16, 17, 18

3.6 The Sustainability Baseline and Key Sustainability Issues

3.6.1 Introduction

Box 2 defines the SEA Directive requirements for this element of the process.

Box 2: SEA Directive Requirements for Baseline Data Collation

'the environmental characteristics of areas likely to be significantly affected' (Annex 1 (c))

'any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EC'(Annex 1 (d)).

Characterising the environmental and sustainability baseline, issues and context is an essential part of developing the IIA Framework. It comprises the following key elements:

- Characterising the current state of the environment within the Old Oak & Park Royal Development Corporation area including social and economic aspects; and
- Using this information to identify existing problems and opportunities that could be considered in the Local Plan.

The environmental, social and economic baseline was characterised through the following methods:

- Review of relevant local, regional and national plans, strategies and programmes;
- Data research based around a series of baseline indicators developed from the SEA Directive topics (biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape), ODPM guidance and NPPG, and the data available for London. This encompassed data relating to HRA. Data was also collated for additional socio-economic topic areas relating to HIA and EqIA including deprivation, housing and employment to ensure that a broad range of environmental, social and economic issues were considered; and
- The results of the scoping workshop with stakeholders in July 2015.

The collation of baseline data also enabled the identification of key sustainability issues and opportunities affecting the area.

Appendix C summarises the key baseline trends across the area. Each section is subdivided to present the following:

- The baseline indicators that have been used (some are also contextual indicators and may not actually form part of the IIA Framework).
- Descriptive text, graphs and statistics about the County.
- Key data gaps.

Appendix C also provides a summary of how the identified key sustainability issues and opportunities might be addressed in the Local Plan. Sustainability issues and opportunities identified from the baseline review are summarised in **Table 3-3**.

The SEA Directive requires 'material assets' to be considered within SA. Material assets refer to the stock of valuable assets within a study area and can include many things from valuable landscapes, natural and cultural heritage through to housing stock, schools, hospitals and quality agricultural land. It is considered that the material assets of the area are appropriately covered in the following baseline sections, and consequently will not be repeated as a separate section:

- Biodiversity, Flora and Fauna;
- Soils and Geology;

- Cultural Heritage;
- Landscape;
- Housing; and
- Transportation.

3.6.3 Key Sustainability Issues and Opportunities

Table 3-3 presents a summary of the key sustainability issues and opportunities for OPDC.

Table 3-3 Key Sustainability Issues and Opportunities

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Population	<ul style="list-style-type: none"> The current population of OPDC is considered to be low, consisting of 4,491 persons in 1,898 households. The dominant age group is 25 – 64 years old. Compared to the national average (16.3%), the area has a significantly lower ageing population percentage (aged 65+) of 6.1%. OPDC have been charged with delivering at least 24,000 new homes within the study area, which will see the population rise significantly compared to its current level. After White British (21.6%), there are significant populations of Other White (18.6%) and Black (African/Caribbean and Other total 24%). There is an Irish Traveller community living within the study area. A large transitory construction workforce could also have negative effects on the community. 	<ul style="list-style-type: none"> The influx of future population needs careful management to reduce inequalities throughout the area and adjoining boroughs. The Local Plan could seek to model the unknown future population, drawing on lessons learnt from other major development projects such as King’s Cross. Careful consideration should be given to the wider population trend of an ageing population as well ensuring an attractive area for young adults and those who may be looking to raise a family. This provides opportunities for Lifetime Neighbourhoods and intergenerational mixed housing. The provision of accessible services should meet existing and new local population growth needs. The provision of social infrastructure needs for healthcare and key services due to a large future population needs to be prioritised, exploration of developing sites before threshold population numbers should be explored. The Local Plan should consider the potential for the withdrawal of Permitted Development Rights for the conversion of offices to residential use, to prevent the reduction in community cohesion and access to facilities. 	SEA: Population, Human Health HIA EqIA	1, 2, 4, 5, 13, 14, 15, 16
Education and Qualifications	<ul style="list-style-type: none"> The percentage of people with no qualifications in 2011 was 16%. The percentage of people with NVQ Level 4 qualification or above was 36.5% compared with 44.7% for Inner London and 27.4% for England. There is a gap in education facilities within the area. 	<ul style="list-style-type: none"> Positive trends in the following should be expected: <ul style="list-style-type: none"> Reducing the number of residents without a qualification; Ensuring new population numbers have adequate educational facilities; Ensuring that schools and other education facilities outside the OPDC area aren’t adversely affected. Opportunities to incorporate work based learning/training should be incorporated into the Local Plan where possible. These opportunities could also be linked to the colleges and universities within the surrounding area. 	SEA: Population, Human Health, Material Assets HIA EqIA	13, 14, 15, 16

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Health	<ul style="list-style-type: none"> 15.1% of the area's population stated they have limiting long-term illness or disability, higher than the London average. Life expectancy for men is 2 years lower than the national average. During the period 2010/11 and 2012/13, 11.8% of children at reception year were considered obese, with an additional 23.6% carrying excess weight. A further 23.6% of children in year 6 were identified as obese, with the same figure for London recorded at 22.5%. There are pockets of health deprivation within the study area along with a very poor living environment. Due to its industrial nature and history, there is a lack of primary care facilities within the OPDC boundaries, with the exception of Central Middlesex Hospital. There is currently poor accessibility to district and Local Park sized open space/green infrastructure/play space. 	<ul style="list-style-type: none"> The rise of people who are in good health across the area and the continued reduction of those in poor health should be supported. The scale of development means that new care facilities need to be delivered, not as standalone but as part of a combined approach to social infrastructure provision. All new high streets need to obtain 10 out of 10 in the Healthy High Streets measure. Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on local communities- including both psychological and physical effects. Incoming population – there is an opportunity for the health of the local community to be built in to the Local Plan principles from the very beginning. This may include building in street networks, designed to support exercise and so that children can play independently; designing areas of multi-generational play; building in creativity, art, intrigue, surprise – to create a sense of place and a high quality environment; and designing housing and workspace that supports health and well-being. The Local Plan should seek to ensure that accessibility to open spaces, including green spaces, as this can have benefits for both physical and mental health. Design measures should be included within the Local Plan, that encourage a reduction in the need to travel by private car – this could include the provision of a mix of land uses; and the design of well-connected street networks at the human scale. 	<p>SEA: Population, Human Health, Material Assets</p> <p>HIA EqIA</p>	<p>1, 4, 7, 11, 13, 14, 15, 16</p>
Crime	<ul style="list-style-type: none"> The area is one of the more deprived areas of the country in relation to crime levels. Car theft is average or above average in the centre of the OPDC. Violence against persons is also high or above average in the 	<ul style="list-style-type: none"> Given the proposed retention of Strategic Industrial Location (SIL) in Park Royal, the Local Plan should seek to ensure that the design of new development improves the safety and perceived safety of the community and their property. 	<p>SEA: Population, Human Health</p> <p>HIA</p>	<p>13, 14</p>

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	majority of the OPDC area.	<ul style="list-style-type: none"> Secured by Design principles should be reflected in new development within the OPDC area alongside considering wider place-making aspirations. 	EqlA	
Water	<ul style="list-style-type: none"> Both the River Brent and Grand Union Canal are characterised by poor chemical and biological water quality. The western boundary of the OPDC area is at risk of fluvial flooding from the River Brent. There is an increased threat from surface water flooding due to increased precipitation rates generated by climate change. There are risks associated with flooding and the mobilisation of contaminants linked to contaminated land within the area. Counters Creek Combined Sewer is nearly at capacity. In the past 20 years, Thames Water has seen a 15% increase in water usage throughout London. This is equivalent to an increase of 10 litres per person per decade. 	<ul style="list-style-type: none"> The risk of flooding and the mobilisation of contaminants should be prevented through measures such as a site-wide drainage strategy and increased awareness. Such measures could also reduce the risk of flooding. The Local Plan should seek to ensure that there is sufficient infrastructural capacity for new development, ahead of occupation. The Local Plan should seek to encourage increased efficiency in the use of water through design measures. The Local Plan should seek to coordinate the implementation of flood mitigation measures with other public realm requirements including utilities and smart infrastructure. 	SEA: Water, Population, Human Health, Soil, Climatic Factors, Landscape HIA EqlA	3, 6, 7, 9, 10, 15
Soils and Geology	<ul style="list-style-type: none"> There are no areas of Regionally Important Geodiversity Sites (RIGS) within the area. The area's heavy manufacturing history has left a legacy of land contamination which may give rise to number of development issues. 	<ul style="list-style-type: none"> The Local Plan should seek to protect the area's soils from contamination and continue to remediate areas that were impacted in the past. The Local Plan should seek to support the decontamination of soil within the local area. 	SEA: Soil, Biodiversity, Human Health, Water HIA	2, 3, 9, 10, 15
Air Quality	<ul style="list-style-type: none"> The principal threat to clean air in London comes from road traffic. There are areas of high NO₂ concentrations in the along the strategic highway network. Poor air quality can damage people's health and quality of life. It can pose particular problems for vulnerable groups such as the elderly, young children and people suffering from respiratory diseases. 	<ul style="list-style-type: none"> The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities. The Local Plan should seek to ensure that any benefits generated to local air quality from a change in economic land use are not counteracted by the increase in population and 	SEA: Air, Climatic Factors, Material Assets, Human Health	4, 7, 11, 15

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	<ul style="list-style-type: none"> Air Quality Management Areas (AQMA) are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. The whole of the OPDC area is considered to be within an AQMA for levels of nitrogen dioxide (NO₂)⁶ and particulate matter smaller than 10 micrometres (PM₁₀)⁷. Each of the three boroughs have identified the same exceedances and types of pollutants. New types of development in the area may lead to an improvement in local air quality. 	development overall.	HIA	

⁶ Nitrogen dioxide (NO₂) is one of a group of gases called nitrogen oxides. Road transport is estimated to be responsible for about 50% of total emissions of nitrogen oxides, which means that nitrogen dioxide levels are highest close to busy roads and in large urban areas. Gas boilers in buildings are also a source of nitrogen oxides. There is good evidence that nitrogen is harmful to health. The most common outcomes are respiratory symptoms such as shortness of breath and cough. Nitrogen dioxide inflames the lining of the lung and reduces immunity to lung infections such as bronchitis. Studies also suggest that the health effects are more pronounced in people with asthma compared to healthy individuals. <http://www.londonair.org.uk/LondonAir/guide/WhatIsNO2.aspx>

⁷ Particles or particulate matter (PM) are tiny bits of solids or liquids suspended in the air. Particles originating from road traffic include carbon emissions from engines, small bits of metal and rubber from engine wear and braking as well as dust from road surfaces. Others include material from building and industry as well as wind-blown dust, sea salt, pollens and soil particles. Particles smaller than about 10 micrometres, referred to as PM₁₀, can settle in the airway and deep in the lungs and cause health problems. The health effects of particle air pollution have been widely studied, and include premature death and the worsening of heart and lung disease, often increasing admissions to hospital. <http://www.londonair.org.uk/LondonAir/guide/WhatIsPM.aspx>

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Climate Change	<ul style="list-style-type: none"> Energy consumption within the area was similar to the London average in 2009-11. 	<ul style="list-style-type: none"> Greenhouse gas emissions should be reduced at the rate, and exceeding where possible, required to meet local and national targets, helping to mitigate the impacts of climate change. The reduction of energy use in the area should be encouraged both by existing developments and future ones. This might include the development of a site-wide decentralised energy generation and storage network and to create a closed loop system. A high proportion of energy generated should be from low, zero or negative carbon energy sources. 	SEA: Air, Climatic Factors, Material Assets, Human Health HIA	4, 6, 7, 11, 15
Biodiversity, Flora and Fauna	<ul style="list-style-type: none"> There are no designated sites⁸ within the OPDC boundary and no nationally/internationally designated sites (Sites of Special Scientific Interest (SSSI)/SPA/SAC/Ramsar) within 2km. Richmond Park SAC is 6.9km to the south of the OPDC area and Wimbledon Common SAC is 8km to the south. Wormwood Scrubs is a Local Nature Reserve and possesses a variety of wildlife. It is popular with birdwatchers and supports woodland, grassland and is home to common lizards and at least 20 species of butterfly. The Grand Union Canal and adjacent area in Old Oak South is a nature conservation area of Metropolitan Importance. 	<ul style="list-style-type: none"> The Local Plan should seek to ensure that impacts to designations, species and habitats is minimised as well as seeking to encourage increased biodiversity within the area. Opportunities should be sought to ensure that protected species have favourable conservation status and are thriving. Opportunities should be sought to promote habitat connectivity both within the area and outside of it. The layout of connected habitats and a wider green infrastructure scheme of walking and cycling routes could form the basis for the spatial planning of the OPDC area. Wormwood Scrubs Local Nature Reserve's and the Grand Union Canal's habitat and species should be protected and enhanced. 	SEA: Biodiversity, Flora, Fauna, Population, Soil, Water, Air, Climatic Factors, Landscape HIA	1, 9, 10, 11, 12, 15, 18

⁸ Nature sites and areas of countryside can be 'designated', which means they have special status as protected areas because of their natural and cultural importance. There are restrictions on activities and developments that might affect a designated or protected area, e.g. building new houses or roads. This includes areas next to as well as in those areas. (<https://www.gov.uk/check-your-business-protected-area>)

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	<ul style="list-style-type: none"> There is potential for impacts to protected species as a result of an increasing population and the resulting development required to meet population needs. 			
Cultural Heritage assets	<ul style="list-style-type: none"> There are a number of undeclared heritage assets in the area. There is the potential for undiscovered archaeological remains to exist throughout the area. There is one listed asset within the OPDC area – Brent Viaduct. Within the boundary there are two Conservation Areas, these include: Old Oak Lane; and along the Grand Union Canal. Adjacent to the study area are the St. Mary’s Conservation Area in Hammersmith and Fulham, which includes the St Mary’s Cemetery and parts of the Kensal Green Cemetery. The Kensal Green Cemetery Conservation Area in The Royal Borough of Kensington and Chelsea includes the majority of the listed buildings and monuments and the majority of the Registered Park and Garden (Grade I registered Park and Garden of special historic interest which contains the Grade I listed Anglican Chapel, twelve Grade II* listed buildings or monuments and 147 Grade II listed buildings or monuments). Within the surrounding area, the following conservation areas may also be affected by development within the OPDC area: <ul style="list-style-type: none"> Harlseden; Old Oak and Wormholt; Hangerhill Garden Estate; and Hagerhill (Hay Mills) Estate. 	<ul style="list-style-type: none"> The Local Plan should ensure that both designated and undesignated or undiscovered heritage assets and their settings, and archaeological remains are protected and, where appropriate, enhanced. Cultural heritage assets throughout the OPDC area could provide an opportunity for tourism and leisure. Opportunities should be sought to safeguard and promote awareness of the important heritage assets and their settings within the OPDC area – particularly in relation to the area’s role in industry and during the interwar period. Cultural heritage assets could also provide an opportunity to enhance the area environmentally, socially, as well as economically. This should be considered throughout the development of the Local Plan, with assets being enhanced and conserved for future use. Statutory sites outside the OPDC boundary also need to be protected and safeguarded, particularly in terms of their setting. Cross-boundary issues with respect to heritage assets and views need to be addressed. OPDC could explore the potential for the production of a Local List of locally significant heritage assets, to be considered as part of the planning process. With the Mayor’s support Historic England has recently consulted upon and is now finalising guidance for the comprehensive review programme for London’s Archaeological Priority Areas. A desk-based appraisal should be undertaken by OPDC to identify areas of known or potential archaeological interest meriting identification as new priority areas. 	SEA: Population, Material Assets, Cultural Heritage, Landscape	1, 5, 12, 13, 18

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Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	<p>Other notable listed buildings whose setting could be affected by development in the Opportunity Area include the Grade II* listed gatehouse and chapel at Wormwood Scrubs Prison, the Church of All Souls Harlesden (also Grade II*), and thirteen Grade II listed buildings within 250m of the boundary. Further afield are Statutory Listed buildings, the closest being Kenmont Primary School and Park Royal Underground Station.</p> <ul style="list-style-type: none"> • The Old Oak Common and Park Royal areas have a disparate assortment of railway and industrial heritage that play a valuable role in informing the evolving character of the area. Specific collections of non-designated heritage assets are located along the east of Scrubs Lane, the interwar Rolls Royce works and Acava Studios on Hythe Road. • A significant number of the heritage assets listed above are on English Heritage’s Heritage at Risk Register. These include Kensal Green Cemetery, as well as 35 monuments within it, including the Anglican Chapel. Twyford Abbey to the west of the opportunity area is also a long standing Heritage at Risk case. • Whilst there are at present no archaeological priority areas within the proposed local plan area, the Greater London Historic Environment Record holds information on several archaeological investigations, sites and finds. Notably the site of Acton Wells 18th century spa is located within the Opportunity Area. The open ground of Wormwood Scrubs was the site of a rifle range and anti-aircraft battery and may preserve as yet undiscovered earlier remains. The Grand Junction Canal and Old Oak Common area include aspects of railway and industrial archaeological interest. The 19th century Park Royal cemetery would also be of interest if subject to redevelopment. 			

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Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Landscape and Townscape	<ul style="list-style-type: none"> The OPDC area comprises a largely industrial townscape with its edges influenced by more residential areas and strategic roads. Railway infrastructure is a dominant feature across the site. Along the south-eastern boundary lies Wormwood Scrubs Park which is grassland and some woodland. The eastern boundary is Kensal Green Cemetery. While there are substantial areas of green space on the periphery of the plan area, the industrial nature of the area means that most parts have a severe open space deficiency. 	<ul style="list-style-type: none"> Opportunities could be sought to maintain the important heritage of Old Oak in particular and OPDC more widely. Access to and awareness of the unique aspects of the area should be improved. The development of the area should enhance adjoining landscapes situated on the OPDC boundary and vice versa. Integration with the All London Green Grid Area SPG Frameworks is an important consideration. It is essential that townscape character and quality is maintained/enhanced through high quality design, careful siting, and incorporation of soft landscaping. 	SEA: Landscape, Material Assets, Cultural Heritage	1, 2, 5, 6, 8, 10, 11, 12, 13, 14, 15, 18
Waste	<ul style="list-style-type: none"> Recycling rates are higher for Ealing compared to Brent, Hammersmith & Fulham and London as a whole though they have increased between 2010 and 2012. There is currently no data available on the municipal waste sent to landfill in the area. There are several waste sites within the area: European Metal Recycling; Powerday; Capital Waste Ltd; UK Tyre Exporters; O'Donovan's Waste Disposal Ltd. 	<ul style="list-style-type: none"> Opportunities should be sought to continue the reduction in waste being sent to landfill. London Waste and Recycling Board – there is an opportunity for the OPDC area to become an exemplar centre for the creation of an 'integrated circular economy'. This could include the creation, use and recycling of products locally, including the potential for the growing of local food through the use of vertical farms. The Local Plan should seek to increase rates of recycling, reuse and composting of waste, which would otherwise be sent to landfill. The Local Plan should explore the delivery of innovative waste transport and management techniques supported by smart city technology. Due to potential land use changes, there's a need to consider waste apportionment with the neighbouring boroughs and where waste will be processed if these uses are displaced by new development. 	SEA: Population, Human Health Material Assets, Soil, Air, Landscape, Climatic Factors HIA EqIA	2, 3, 6, 7, 8, 9, 10, 11, 15, 18
Transportation	<ul style="list-style-type: none"> Old Oak and Park Royal are poorly connected to the 	<ul style="list-style-type: none"> Opportunities should be sought to maximise modal shift towards sustainable transport modes, in particular, walking 	SEA: Population,	1, 4, 6, 7, 11, 13, 14, 15, 17,

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	<p>wider road network.</p> <ul style="list-style-type: none"> • Both Old Oak and Park Royal generate significant numbers of road freight movements. • Access to and from Old Oak station is currently poor. • There are a number of ‘hard edges’ along the boundary of the OPDC area, which creates poor legibility for walkers and cyclists. • Roads in Park Royal are congested. 	<p>and cycling.</p> <ul style="list-style-type: none"> • Opportunities should be sought that maximises rail transport of both goods and people. • The Local Plan should seek to ensure that improvements in the area do not lead to increase pollution/traffic etc., elsewhere across London. • Opportunities should be sought that maximises opportunity for green networks and improves connectivity for people across the area. • Green Infrastructure – there is an opportunity to create green infrastructure which facilitates live/work/play/travel through as well as fast and meandering routes. However, the Local Plan should manage the spread of routes across the OPDC area, so that certain routes do not become congested. • The Grand Union Canal presents a great opportunity for both water travel and freight movements as well as footpaths and should be considered a strategic transport link within the area. However, capacity issues should be taken into consideration. • There is an opportunity to significantly improve accessibility to and throughout the site, including the creation of legible routes and reducing ‘hard edges’. The Local Plan should consider alternatives to the use of on-street parking and servicing at the fronts of buildings, as these can have a negative effect on the ‘street atmosphere’. • Opportunities should be sought to reduce motorised transport and increase the use of greener, smarter, more sustainable modes of transport. • Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road 	<p>Human Health, Air, Climatic Factors, Material Assets HIA EqlA</p>	<p>18</p>

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
		network and local communities.		
Noise	<ul style="list-style-type: none"> Road and rail noise are significant contributors to the ambient noise environment, particularly around the town centre and main distributor roads. 	<ul style="list-style-type: none"> The Local Plan should seek to minimise the effects from noise pollution on the existing and incoming population, and ensure that these effects do not disproportionately affect any particular socio-economic or equalities group. 	SEA: Human Health, Population HIA EqIA	1, 2, 4, 11, 12, 15, 18
Local Economy	<ul style="list-style-type: none"> The area is characterised by some 2,000 businesses – the majority (75%) of these are micro in scale. The OPDC area suffers from employment deprivation. There’s a strong element of warehousing and other light to heavy industrial uses. A large proportion of residents within the area work locally. The displacement of existing businesses in the area could lead to a negative effect on the existing community. Affordable workspace – much of the available workspace is affordable at present, due to its poor quality. There is also an issue relating to density in this area – warehousing uses are low employment generators. 18.6% of the population have been claiming job seekers allowance for more than a year. There are inequalities between men and women. Infrastructure/Utilities – a key issue for the area is how infrastructure/utilities will be improved to accommodate the new development. In particular, broadband capacity is very poor at present within Park Royal. Also transport links need significant improvement. Town centres – there is a potential issue that the development of offices and retail facilities within the OPDC area would destroy neighbouring town centres, including Ealing town centre. 	<ul style="list-style-type: none"> Employment and training - There is an opportunity for the Local Plan to specify that a proportion of incoming employment opportunities are to be directed towards local people in the existing and surrounding communities. This combines with an opportunity to upskill the local workforce, the majority of whom may currently be in lower-skilled jobs in the local area. The Local Plan should seek to provide employment and business opportunities that meet the current and future needs of the local and regional economy, within the context of the neighbouring communities. The Local Plan should seek to ensure that the appropriate infrastructure capacity is developed and planned comprehensively, ahead of the occupation of new development. A fine balance between place-making, providing enough facilities, and not destroying external town centres, needs to be sought. Improved connectivity from the OPDC area to the town centres could be beneficial in this respect. Harlesden town centre would be walkable from the OPDC area. Healthy New Towns – NHS England are seeking to promote this initiative in the OPDC area. This is based on health-led employment in the centre, for clean, green and healthy technology businesses. This may include research companies etc. North Acton is seeking to attract a university campus in the 	SEA: Population, Human Health, Material Assets HIA EqIA	1, 2, 3, 15, 16, 17, 18

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
		<p>OPDC area, which would buffer the industrial area further north, with an area of student housing further south. Anecdotal evidence suggests that the campus may be associated with Imperial College.</p> <ul style="list-style-type: none"> • Town centres – there is a potential issue that the development of offices and retail facilities within the OPDC area would negatively impact on neighbouring town centres, including Ealing town centre, if not appropriately managed. • The land uses in the OPDC area are likely to experience a wholesale change from the existing situation. This could provide an opportunity to reduce disparities across the area. 		
Deprivation and Living Environment	<ul style="list-style-type: none"> • The area lies within other deprived areas of Brent, Ealing and Hammersmith & Fulham and falls within the most deprived areas for living environments. 	<ul style="list-style-type: none"> • Deprivation is a very complex issue and a number of different issues will need to be addressed for noticeable improvements to be realised. Enhancements in the OPDC area that deliver employment opportunities, high quality new housing, improved public realm, and access to nature, would all provide benefits towards reducing deprivation. 	SEA: Population, Human Health HIA EqIA	1, 4, 5, 6, 8, 9, 11, 12, 13, 14, 15, 16, 17
Housing	<ul style="list-style-type: none"> • 38.3% of the population in the OPDC area rent accommodation from private landlords, which is a rate that is significantly higher than adjoining boroughs. • 29.5% of households are owner-occupiers, compared to 42.9% in Brent, 34% in Hammersmith & Fulham and 51.1% in Ealing. • There is a shortage in the amount of affordable housing provided and there is a continuing need for affordable housing in the area and in London overall. • There is a Traveller site next to Old Oak on Backley Road, which is linear against the railway line and a metal refinery. • 9% of households in the plan area are lone parent families and over 90% of these parents are women. Lone parents experience some of the greatest levels of 	<ul style="list-style-type: none"> • Opportunities should be sought to provide housing that meets London-wide and local needs including the provision of affordable, low cost market, student and special needs housing. • The Local Plan should seek to lift more LSOAs out of the bottom 10% for housing deprivation. 	SEA: Population, Human Health HIA EqIA	1, 5, 11, 13, 14, 15

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqlA and HRA	Relevant Draft IIA Objective
	<p>economic and housing need, their household incomes are only about a third of the average income. They are more than three times more likely to be dependent on benefits than the average household, and twice as likely to be in unsuitable housing.</p>			

Nitrogen dioxide (NO₂) is one of a group of gases called nitrogen oxides. Road transport is estimated to be responsible for about 50% of total emissions of nitrogen oxides, which means that nitrogen dioxide levels are highest close to busy roads and in large urban areas. Gas boilers in buildings are also a source of nitrogen oxides. There is good evidence that nitrogen is harmful to health. The most common outcomes are respiratory symptoms such as shortness of breath and cough. Nitrogen dioxide inflames the lining of the lung and reduces immunity to lung infections such as bronchitis. Studies also suggest that the health effects are more pronounced in people with asthma compared to healthy individuals. <http://www.londonair.org.uk/LondonAir/guide/WhatIsNO2.aspx>

Particles or particulate matter (PM) are tiny bits of solids or liquids suspended in the air. Particles originating from road traffic include carbon emissions from engines, small bits of metal and rubber from engine wear and braking as well as dust from road surfaces. Others include material from building and industry as well as wind-blown dust, sea salt, pollens and soil particles. Particles smaller than about 10 micrometres, referred to as PM₁₀, can settle in the airway and deep in the lungs and cause health problems. The health effects of particle air pollution have been widely studied, and include premature death and the worsening of heart and lung disease, often increasing admissions to hospital. <http://www.londonair.org.uk/LondonAir/guide/WhatIsPM.aspx>

Nature sites and areas of countryside can be 'designated', which means they have special status as protected areas because of their natural and cultural importance. There are restrictions on activities and developments that might affect a designated or protected area, e.g. building new houses or roads. This includes areas next to as well as in those areas. (<https://www.gov.uk/check-your-business-protected-area>).

3.6.4 Cross-boundary considerations

The OPDC area sits within the context of three London boroughs (Ealing, Brent and Hammersmith & Fulham) with the Royal Borough of Kensington and Chelsea to the east. As such, it has a role to ensure that the scale of development proposed for the area is with an understanding of the pressures faced by those boroughs and by London as a whole. The area is bounded by major roads such as the A40, connectivity from south to north is poor – specifically with regard to walking and cycling connections into Park Royal, south to White City and east to Kensal Canal side. Care should therefore be taken when considering future development to ensure that the impacts felt by adjoining boroughs isn't too disruptive either during construction or post-construction phases (e.g. construction traffic when coupled with existing business traffic). However, equally this creates an opportunity to encourage inward investment which the boroughs could benefit from.

The area and the remit of the OPDC presents a unique opportunity to incorporate the site area's heritage within its future development plans. Further, on its boundary, lies the St Mary's, Kensal Green Cemetery (Grade I registered park and garden of special historic interest), which contains a Grade I listed chapel, twelve Grade II* listed buildings/monuments and 147 Grade II listed buildings/monuments. Views from this into area and vice versa need to be adequately considered and protected throughout the development of the OPDC area.

The quantum and change of development types needs to be carefully managed to ensure that existing businesses are still able to remain open both within the area and outside of it. As the area develops, it will be important to consider how nearby town centres, such as Harlesden and Ealing, will be affected by the scale of change proposed.

The OPDC area suffers from high levels of living environment deprivation. There is poor connectivity within the site as well as out into the wider surroundings. The redevelopment of the area should seek to improve open space provision all around the area in addition to improving connections to Wormwood Scrubs as well as enable green infrastructure and services that could be used by residents and non-residents of the area alike.

There needs to be careful consideration of the future in-migration into the OPDC area. It's important that the current population (in neighbouring boroughs and within area) doesn't feel pushed out or has cause to be envious of the facilities and services provided when compared to their own. There should be a concerted effort to reduce inequality.

3.7 The IIA Framework

3.7.1 Background to the IIA Framework

The IIA Framework underpins the assessment methodology and comprises a series of Sustainability Objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. Whilst the SEA Directive does not require the use of objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.

The IIA Objectives are separate from the objectives of the Local Plan, although there may be some overlaps between them. To help measure the performance of the Local Plan's components against the IIA Objectives, it is beneficial if they are supported by a series of indicators. Baseline data should be collated to support each of the indicators, as this provides a means of determining current performance across the OPDC area and gauging how much intervention or the extent of work needed to achieve the targets that have been identified. The following section provides further details about the development of the IIA Framework.

3.7.2 Development of the IIA Objectives

The IIA Framework has been developed using the IIA Framework from the Draft OAPF IIA (February 2015)⁹ as a base. This was analysed and refined, using the following:

⁹ <https://www.london.gov.uk/sites/default/files/OOPR%20OAPF%20draft%20IIA%20Report.pdf>

- Comparison against the updated PPPs and identified key sustainability issues and opportunities;
- Comparison against the SAs developed for the Local Plans for:
 - Brent;
 - Ealing;
 - Hammersmith and Fulham;
- Assessment against the requirements of the NHS London Health Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool Framework (January 2013);
- Comparison with the 'Equality Framework' included in the Mayor of London's 'Equal Life Chances for All' Policy Statement (July 2009);
- Findings from the IIA Workshop; and
- Consultation Comments on the Scoping Report (September 2015) (See **Appendix E**)

Table 3-4 presents the IIA objectives that have been used in the assessment of the Regulation 18 Local Plan. Each of the IIA Objectives is supported by a series of sub-objectives to add further clarity and to assist the assessment process. However, it is noted that the objectives are not mutually exclusive and the assessment framework should be considered in its entirety. As such, the IIA Objectives are not presented in any particular order, with all objectives being considered as having equal weighting. The IIA Objectives included in **Table 3-4** below are:

1. To enhance the built environment and encourage 'place-making'
2. To optimise the efficient use of land through increased development densities and building heights, where appropriate
3. Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land
4. Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network
5. Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs
6. Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect
7. To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy
8. To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste
9. Improve the quality of the water environment
10. Create and enhance biodiversity and the diversity of habitats across the area and its surroundings
11. To minimise air, noise and light pollution, particularly for vulnerable groups
12. To conserve and enhance the historic environment, heritage assets and their settings
13. Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare
14. Improve safety and reduce crime and the fear of crime
15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living
16. To improve the education and skills levels of all members of the population, particularly vulnerable groups

17. Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training
18. To encourage inward investment alongside investment within existing communities, to create sustainable economic growth

Where possible, IIA Objectives are also supported by indicators. The indicators selected link to those used to describe the baseline conditions across the area, as an understanding of the existing conditions is needed to inform the assessment. Where baseline data is not currently available, indicators have been suggested as to the type of information that may be appropriate. OPDC are currently undertaking a series of evidence-based studies, which will support the development of the Local Plan. Once this is available, relevant data will be added to the IIA baseline, and the indicators refined, as part of the iterative nature of the IIA process. Throughout the course of the IIA, quantified targets will be identified where possible to supplement this framework in liaison with OPDC.

Table 3-4 IIA Framework

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
1	<p>To enhance the built environment and encourage ‘place-making’</p> <ul style="list-style-type: none"> • Optimise development opportunities to develop and enhance local distinctiveness and character • Ensure new buildings and public spaces are appropriately designed and constructed including enabling the creation of safe and welcoming spaces and access for all • Create new, accessible and managed open spaces- public, communal, private and children’s play space, public realm and spaces where children can play independently, which reflect the needs of the community. • Maximise the contribution that the arts, culture and heritage can make to a community including building creativity, art, intrigue, character and surprise into the built environment • Increase in the legibility of public spaces and increase walking and cycling routes within and adjacent to Old Oak and Park Royal • Encourage the use of contemporary technology in the public realm to support design, delivery and management • Encourage adherence to the principles of Lifetime Neighbourhoods • Maximise delivery of active frontages in appropriate locations <p>Link to objectives 12 (heritage), 5 (housing); 13 (community cohesion); 14 (crime and fear of crime); 15 (health and wellbeing)</p>	<ul style="list-style-type: none"> • <i>Provision of publicly accessible open space in accordance with the London Plan Categorisation¹⁰:</i> <ul style="list-style-type: none"> ○ Regional Parks (400ha): 3.2 to 8km from homes; ○ Metropolitan Parks (60ha): 3.2km from homes; ○ District Parks (20ha): 1.2km from homes; ○ Local Parks and Open Spaces (2ha): 400m from homes; ○ Small Open Spaces (under 2ha): less than 400m from homes; ○ Pocket Parks (under 0.4ha): less than 400m from homes; ○ Linear Open Spaces (Variable): wherever feasible. • <i>Proportion of accessible open spaces created which have a long term management and funding plan.</i> • <i>Integration with the All London Green Grid Area Frameworks</i> • <i>Number of new buildings and public spaces designed to be inclusive</i> • <i>Proportion of new development incorporating an appropriate level of open space for recreation</i> • <i>Legibility and quality of the pedestrian and cycle environment</i> • <i>Proportion of new development incorporating Lifetime Neighbourhoods principles</i> 	<p>SEA: Population, Human Health, Material Assets, Cultural Heritage, Landscape</p> <p>HIA</p> <p>EqIA</p>

¹⁰ https://www.london.gov.uk/sites/default/files/ALGG_SPG_Mar2012.pdf

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
		<ul style="list-style-type: none"> • <i>Proportion of people who are happy with their local environment as a place to live</i> • <i>Proportion of new development using technology to improve legibility</i> 	
2	<p>To optimise the efficient use of land through increased development densities and building heights, where appropriate</p> <ul style="list-style-type: none"> • Optimise housing density in a way that makes the most efficient use of land whilst meeting housing needs • Optimise development density in a way that makes the most efficient use of land whilst meeting commercial needs and responding to sensitive areas <p>Link to objectives 7 (natural resources use); and 8 (waste)</p>	<ul style="list-style-type: none"> • <i>Housing density in comparison to neighbourhood quality</i> • <i>Density of commercial development in comparison to existing (2015) levels</i> 	<p>SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets</p> <p>HIA</p>
3	<p>Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land</p> <ul style="list-style-type: none"> • Increase accessibility to household and commercial sustainable waste management facilities • Improve soil quality and achieve more effective geoconservation where appropriate • Contribute to a scheme of strategic land remediation <p>Link to objectives 4 (natural resources use); 6 (waste); and 12 (reuse of existing buildings)</p>	<ul style="list-style-type: none"> • <u>Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles)</u> • <i>Quality of soil resources</i> • <i>Materials balance as a result of construction activities</i> • <i>Development and implementation of a strategic land remediation scheme</i> • <i>Amount of soil remediated on site</i> 	<p>SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets</p> <p>HIA</p>
4	<p>Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network</p> <ul style="list-style-type: none"> • Increase the co-location of services and facilities, in accessible locations by walking, cycling and public transport • Increase the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via 	<ul style="list-style-type: none"> • <u>Distribution of major transport systems – roads, rail links</u> • <i>Modal shift of existing travel patterns verses future travel patterns</i> • <i>Connectivity of the cycling and walking network</i> • <i>Km of designated cycling and walking routes</i> • <i>Proportion of goods arriving and leaving the area by rail in</i> 	<p>SEA: Population, Human Health, Air, Climatic Factors, Material Assets, Landscape</p> <p>HIA</p> <p>EqIA</p>

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
	<p>green infrastructure networks and the canal</p> <ul style="list-style-type: none"> • Prioritise walking and cycling over other forms of transport • Increases the opportunity for the transport of goods and people by rail transport • Consider the impact of construction on local infrastructure on local businesses and communities • Support the testing and implementation of future transport modes • Mitigate the impact of construction traffic • Maximise the accessibility of stations <p>Link to objectives 7 (climate change); 11 (pollution); and 14 (safety)</p>	<p><i>comparison to road</i></p> <ul style="list-style-type: none"> • <i>Proportion of waste and freight arriving and leading the area by canal.</i> • <i>Proportion of shared spaces within the urban environment</i> • <i>Controlled parking zones, car clubs and travel plan measures implemented</i> • <i>Number of accessible public transport interchanges and bus stops (source: Equal Life Chances for All 2009)</i> • <i>Number of local businesses negatively affected by construction activities</i> • <i>Increase in traffic on the highway network in and around the OPDC area</i> 	
5	<p>Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local and regional needs</p> <ul style="list-style-type: none"> • Provision of adaptable homes for independent living for older and disabled people • Provision of innovative housing typologies to meet needs • Provision of homes to need the needs of older people including extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes • Provision of housing suitable for family accommodation including single-parent families • Increase in use of high quality design including meeting energy efficiency standards • Provision of facilities to meet identified needs of Gypsies, Travellers and Travelling Show people • Ensure all new homes meet Lifetime Homes standards 	<ul style="list-style-type: none"> • <u>Dwelling Stock (Office for National Statistics Local Profiles).</u> • <i>Household density (Office for National Statistics Local Profiles)</i> • <i>Proportion of LSOAs in the bottom 10% for housing deprivation</i> • <i>Proportion of dwellings meeting all of the health and wellbeing credits in the Code for Sustainable Homes</i> • <i>Proportion of dwellings that meet internal space standards</i> • <i>Proportion of dwellings with a high SAP rating</i> • <i>Proportion of the population considered to be homeless (source: Equal Life Chances for All 2009)</i> • <i>Amount of family size housing (source: Equal Life Chances for All 2009)</i> • <i>Proportion of single parent families living in unsuitable</i> 	<p>SEA: Population, Human Health, Climatic Factors, Material Assets</p> <p>HIA</p> <p>EqIA</p>

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
	<p>Link to objectives 1 and 6 (sustainable design); 13 (community cohesion and social exclusion); 14 (secured by design); 15 (health)</p>	<p><i>accommodation</i></p> <ul style="list-style-type: none"> • <i>Amount of affordable housing (source: Equal Life Chances for All 2009)</i> • <i>Amount of Lifetime Homes (source: Equal Life Chances for All 2009)</i> • <i>Proportion of market, affordable and specialist housing delivered.</i> 	
<p>6</p>	<p>Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect</p> <ul style="list-style-type: none"> • Minimise the proportion of new development at risk of flooding from all sources including surface water, groundwater and reservoir flooding • Minimise the increase in risk of flooding elsewhere • Increase the use of sustainable design including Sustainable Urban Drainage, natural ventilation and shading for temperature adaptation <p>Link to objectives 10 (habitat connectivity); 7 (energy efficiency); 12 (sustainable adaptation and reuse of existing buildings)</p>	<ul style="list-style-type: none"> • <u>River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009).</u> • <u>Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map)</u> • <u>Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map)</u> • <i>Proportion of energy usage in buildings using sustainable design compared with standard construction</i> 	<p>SEA: Biodiversity, Human Health, Water, Air, Climatic Factors, Material Assets, Landscape</p> <p>HIA</p> <p>EqIA</p>
<p>7</p>	<p>To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy</p> <ul style="list-style-type: none"> • Enable the area to be more self-sufficient in terms of energy generation and storage • Increase the proportion of energy generated from low, zero or negative carbon energy sources, through consideration of measures from the outset • Increase the proportion of journeys made by non-motorised transport • Increase the use of sustainable design to minimise the resource requirements and outputs of new development <p>Link to objectives 4 (minimise the need to travel); 7 (sustainable design); and 12</p>	<ul style="list-style-type: none"> • <u>Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles)</u> • <u>All energy consumption by sector (Office for National Statistics Local Profiles and DECC)</u> • <i>Energy consumption per capita</i> • <i>Proportion of properties generating energy from low or zero carbon sources, including solar.</i> • <i>Proportion of new developments incorporating district heating or heat pumps</i> • <i>Greenhouse gas emissions per capita compared with London and national averages</i> 	<p>SEA: Population, Human Health, Air, Climatic Factors, Material Assets</p> <p>HIA</p> <p>EqIA</p>

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
	(sustainable adaptation and reuse of existing buildings)	<ul style="list-style-type: none"> <i>Proportion of journeys made by non-motorised transport</i> <i>Proportion of energy generated from low, zero or negative carbon energy sources</i> 	
8	<p>To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste</p> <ul style="list-style-type: none"> Promote the creation of a circular economy for the management of waste Increase the use of recycled materials for the construction of buildings and infrastructure Address the displacement of waste management to other areas Enable the sustainable management of contaminated soils and hazardous waste Increase accessibility to household and commercial sustainable waste management facilities Maximise use of innovative waste collection and waste management techniques including smart technology <p>Link to objectives 7 (resources use); 2 (efficient use of land); 3 (remediation)</p>	<ul style="list-style-type: none"> <u>Number of active / historic landfills on the site (Environment Agency)</u> <u>Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles)</u> <u>Amount of residual waste per household (ONS) sent to landfill or incineration</u> <u>Amount of commercial and industrial waste produced (Defra)</u> Amount of waste recycled and re-used within the area Amount of waste transported within the area 	<p>SEA: Biodiversity, Population, Human Health, Soil, Water, Climatic Factors, Material Assets, Landscape</p> <p>HIA</p> <p>EqIA</p>
9	<p>Improve the quality of the water environment</p> <ul style="list-style-type: none"> Promote the improved efficiency in the use of water domestically and commercially Promote the improved quality of local watercourses Prevent the risk posed to the water environment from the run-off of contaminants Ensure that infrastructural capacity is sufficient to accommodate new development ahead of occupation <p>Link to objectives 1 (biodiversity); 3 (climate change adaptation); 4 (climate change contributions); 5 (pollution); 7 (remediation); and 12 (Grand Union Canal)</p>	<ul style="list-style-type: none"> <u>Water and groundwater quality (Environment Agency)</u> <i>Development of a site wide drainage strategy</i> <i>Water consumption per capita</i> <i>Increase in infrastructural capacity as a proportion of new development</i> <i>Increased use of existing infrastructure</i> 	<p>SEA: Water, Human Health, Soil, Landscape</p> <p>HIA</p>
10	<p>Create and enhance biodiversity and the diversity of habitats across the area</p>	<ul style="list-style-type: none"> <u>Number and distribution of designated sites including</u> 	<p>SEA: Biodiversity,</p>

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
	<p>and its surroundings</p> <ul style="list-style-type: none"> Conserve or enhance existing biodiversity across the plan area, including on brownfield sites Increase the connectivity of habitats across the area and its surroundings Create new areas dedicated to nature conservation Seek to reduce the potential wide ranging impacts on international sites <p>Link to objectives 3 (remediation); 6 (climate change adaptation); 9 (water environment); 11 (pollution); and 12 (Grand Union Canal)</p>	<p><u>SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (MAGIC, www.magic.gov.uk and Local Authority websites).</u></p> <ul style="list-style-type: none"> <u>Key Biodiversity Action Plan (BAP) species and habitats present (London BAP)</u> <i>Protected species with favourable conservation status</i> <i>Habitat connectivity</i> <i>Condition of Wormwood Scrubs Local Nature Reserve</i> <i>Condition of Grand Union Canal area of nature conservation</i> <i>Increase in areas of greenspace for biodiversity including inaccessible areas</i> 	<p>Flora, Fauna</p> <p>HRA</p>
11	<p>To minimise air, noise and light pollution, particularly for communities and vulnerable groups</p> <ul style="list-style-type: none"> Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities through the use of mitigation measures and the locating of future sensitive users away from pollution generators Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities, through the use of mitigation measures and the locating of future sensitive users away from pollution generators Ensure that new waste management facilities do not negatively impact on sensitive uses including existing and future homes, and building occupants. 	<ul style="list-style-type: none"> <u>Number and distribution of Air Quality Management Areas (AQMAs) (Air Quality Archive¹¹)</u> <i>Number of new local air quality monitoring points</i> <i>Ill health attributed to air, noise or light pollution</i> <i>Proportion of the population affected by high levels of noise during construction and post construction including a breakdown by equality group</i> <i>Proportion of the population affected by light pollution from traffic or industry during construction and post construction including a breakdown by equality group</i> <i>Proportion of population living within areas with regular</i> 	<p>SEA: Population, Human Health, Air, Material Assets</p> <p>HIA</p> <p>EqIA</p>

¹¹ <http://uk-air.defra.gov.uk/aqma/maps>

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
	<ul style="list-style-type: none"> Reduce emissions from construction and demolition sites Minimise light pollution <p>Link to objectives 4 (sustainable transport); 7 (climate change); 15 (health)</p>	<p><i>exceedances in NOx and particulates</i></p>	
12	<p>To conserve and enhance the historic environment, heritage assets and their settings</p> <ul style="list-style-type: none"> Promote the historical interpretation of heritage assets, including the canal, through the use of multifunctional green infrastructure Minimise heritage assets lost to new development Avoid adverse impacts on the setting of heritage assets, including those outside the OPDC area Maximise the reuse and adaptation of heritage assets for place-making and minimising the embedded carbon in new development Enhance local views and landscapes Reduce the number of Heritage Assets at Risk in and around the area Reduce impacts on heritage assets and their settings in areas adjacent to the plan area Enhance areas of greenspace in connection with areas of importance for heritage protection <p>Link to objectives 1 (place-making), 3 (reuse of existing buildings), 6 (energy efficiency), 7 (energy generation and sustainable design), 8 (use of recycled materials) and 18 (encourage inward investment).</p>	<ul style="list-style-type: none"> <u>Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens</u> (www.magic.gov.uk). <i>Decrease in the number of Heritage Assets at Risk in and around the area</i> <i>Increase in the number of heritage assets identified and protected through the development of Local List</i> <i>Increase in the number of heritage assets highlighted and enhanced or utilised for place-making and interpretation</i> <i>Development of a local views strategy and proportion of new developments adhering to its principles</i> <i>Increase in the number of heritage assets re-used for development</i> 	<p>SEA: Cultural Heritage, Material Assets, Biodiversity, Climatic Factors, Landscape</p> <p>HIA</p>
13	<p>Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare</p> <ul style="list-style-type: none"> Improve the quality of the public realm and increase the provision, accessibility and quality of public open spaces including play spaces To increase connectivity and avoid physical barriers and severance across the area through measures including green infrastructure, creating physical and 	<ul style="list-style-type: none"> <i>Number of offices converted to residential under permitted development rights</i> <i>Schemes to reduce the impact of construction on the local community</i> <i>Connectivity of pedestrian linkages across the area</i> 	<p>SEA: Population, Human Health, Climatic Factors, Landscape, Material Assets</p> <p>HIA</p>

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
	<p>social linkages with the surrounding communities</p> <ul style="list-style-type: none"> • Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision <p>Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 14 (crime and fear of crime); 15 (health)</p>		EqIA
14	<p>Improve safety and reduce crime and the fear of crime</p> <ul style="list-style-type: none"> • Increase natural surveillance and other measures to design out crime • Encourage increased safety through the use of traffic management and calming methods <p>Link to objectives 1 (place-making); 4 (sustainable transport); 5 (housing); 13 (community cohesion); 15 (health)</p>	<ul style="list-style-type: none"> • <u>Crime rates (Indices of Deprivation)</u> • <i>Road traffic accidents and diversity profiling (source: Equal Life Chances for All 2009)</i> • <i>Percentage of people who feel that there is less discrimination in their neighbourhood than 3 years ago (source: Equal Life Chances for All 2009)</i> • <i>Percentage of the local population who feel personal safety on buses, tubes and trains (source: Equal Life Chances for All 2009)</i> • <i>Percentage of women who feel safe using local bus, tube, trains, black cabs, and mini cabs at night, alone (source: Equal Life Chances for All 2009)</i> • <i>Proportion of developments incorporating Secured by Design principles</i> 	SEA: Population, Human Health, Material Assets HIA EqIA
15	<p>Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living</p> <ul style="list-style-type: none"> • Increase accessibility to social infrastructure including health care facilities, schools, social care and community facilities • Increase the capacity of local social infrastructure • Encouragement of opportunities for buildings with a shared community use and the co-location of services • Facilitate the supply of local food through the provision of space for uses such 	<ul style="list-style-type: none"> • <u>Health Deprivation and Disability (Indices of Deprivation for England 2010)</u> • <i>Proportion of the population living within walking distance of health care facilities (see Table 3-5)</i> • <i>Proportion of the population living within walking distance of education facilities (see Table 3-5)</i> • <i>Proportion of the population living within walking distance of social care facilities (see Table 3-5)</i> 	SEA: Population, Human Health, Material Assets, Soil, Air, Water, Landscape HIA EqIA

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
	<p>as allotments or farmers markets</p> <ul style="list-style-type: none"> Reduce the potential for an over-concentration of hot food takeaways in the local area Minimise construction phase impacts on communities, in relation to both physical and psychological health <p>Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 13 (social and economic wellbeing)</p>	<ul style="list-style-type: none"> <i>Proportion of the population living within walking distance of community facilities (see Table 3-5)</i> <i>Proportion of the population with access to space for the growing of food locally</i> <i>Increase in the capacity of local social infrastructure</i> <i>Childhood obesity rates</i> <i>Life expectancy</i> 	
16	<p>To improve the education and skills levels of all members of the population, particularly vulnerable groups</p> <ul style="list-style-type: none"> Increase in the availability of formal education across all age groups, including adults from all equality groups Increase in the availability of informal education and training for all <p>Link to objectives 4 (accessibility); 13 (community cohesion); 15 (health and wellbeing); 117 (social and economic wellbeing); 18 (sustainable economic growth)</p>	<ul style="list-style-type: none"> <u>Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).</u> <u>Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles).</u> <u>Education, Skills and Training Deprivation (Indices of Deprivation for England 2010).</u> <i>Proportion of the population with access to appropriate education facilities by sustainable transport modes</i> <i>Decrease in educational underachievement gap between disadvantaged groups and the wider community (source: Equal Life Chances for All 2009)</i> 	<p>SEA: Population Human Health, Material Assets</p> <p>HIA</p> <p>EqIA</p>
17	<p>Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training</p> <ul style="list-style-type: none"> Provision of access to a range of high quality local employment opportunities, a proportion of which will be directed towards local people, both during construction and permanent jobs, including those from disadvantaged groups Encourage workforces to reflect local and regional diversity in all occupations and at all levels Provision of access to a range of work-based and other training opportunities, a proportion of which will be directed towards local people, including those from 	<ul style="list-style-type: none"> <u>Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010)</u> <i>Proportion of new employment and training opportunities being awarded to local people via local procurement arrangements</i> <i>Proportion of new employment and training opportunities being awarded to local women via local procurement arrangements</i> <i>Employment rate by excluded group compared to</i> 	<p>SEA: Population, Human Health, Material Assets</p> <p>HIA</p> <p>EqIA</p>

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u> ; proposed indicators: <i>italics</i>)	Relevance to SEA, HIA, EqIA, HRA
	<p>disadvantaged groups</p> <ul style="list-style-type: none"> • Provision of a range of accessible retail stores, including food stores and smaller affordable shops for social enterprises • Increase in the provision of facilities for childcare • Encouragement of employer's to adopt the London Living Wage <p>Link to objectives 15 (health and wellbeing); 116 (education and training) and 18 (sustainable economic growth)</p>	<p><i>employment rate of all Londoners (source: Equal Life Chances for All 2009)</i></p> <ul style="list-style-type: none"> • <i>Workforce profile at all levels (source: Equal Life Chances for All 2009)</i> • <i>Proportion of the community living within walking distance of a local shop (see Table 3-5)</i> • <i>Levels of Child Poverty (source: Equal Life Chances for All 2009)</i> • <i>Number of childcare places (source: Equal Life Chances for All 2009)</i> • <i>Take-up of subsidised childcare places (including those for disabled children) benchmarked against the LDA Childcare Affordability Programme (source: Equal Life Chances for All 2009)</i> 	
18	<p>To encourage inward investment alongside investment within existing communities, to create sustainable economic growth</p> <ul style="list-style-type: none"> • Increase in the net number of businesses registered in the area • Increase infrastructure and utilities capacity, including broadband connections • Ensure workspace meets the needs of new and emerging businesses, including affordable, flexible and micro/SME workspace • Deliver retail that does not negatively impact on neighbouring town centres • Encourage the development of employment growth sectors including clean, green and healthy businesses • Support the relocation of business from Old Oak to Park Royal. • Intensify the use of workspaces within Park Royal <p>Link to objectives 16 (education and training) and 17 (social and economic wellbeing).</p>	<ul style="list-style-type: none"> • <u>Economy Local Profiles (ONS)</u> • <u>Employment by industry (ONS- NOMIS)</u> • <i>Proportionate coverage of broadband across the area</i> • <i>Proportion of new employment development that includes an element of affordable workspace</i> • <i>New businesses categorised as 'health-led'</i> • <i>New businesses that contribute to the growth of the low carbon goods and services sector</i> • <i>Amount of new employment floorspace in Old Oak</i> • <i>Amount of new industrial floorspace in Park Royal</i> 	<p>SEA: Population, Human Health, Material Assets</p> <p>HIA</p> <p>EqIA</p>

Table 3-5 – Accessibility Standards¹²

Local Facility	Illustrative catchment populations	Minimum reasonable accessibility standards at different gross densities (assuming bendy routes)			
		40ppha	60ppha	80ppha	100ppha
Nursery / first school	2,000	600m	500m	400m	400m
Primary / middle school	4,000	800m	700m	600m	500m
Secondary School	8,000	1,200m	1,000m	700m	700m
Secondary School (large)	16,000	1,500m	1,200m	1,000m	1,000m
Health Centre (4 doctors)	10,000	1,200m	1,000m	900m	800m
Local Shop	1,500	500m	400m	400m	300m
Pub	6,000	1,000m	800m	700m	600m
Post Office	5,000	800m	700m	600m	600m
Community Centre	4,000	800m	600m	600m	500m
Local Centre	6,000	1,000m	800m	700m	600m
District Centre / Superstore	24,000	1,900m	1,500m	1,300m	1,200m
Leisure Centre	24,000	1,900	1,500m	1,300m	1,200m

3.8 Assessment Methodology

The appraisal will be presented in an appraisal matrix for each group of policies and allocations. The matrix is an established method for clearly analysing the performance of the policies or sites and helps meet the requirements of the SEA Regulations by ensuring that the following elements are considered. This will enable significant effects to be identified:

- Impact – whether the impact will be positive, negative or neutral when assessed against the SA Objectives.
- Temporal scale – whether the impact will be short-term (within 0-5 years of Local Plan implementation), occur in the medium term (within 5 – 10 years of Local Plan implementation) or occur in the long-term (10 – 25 years of Local Plan implementation).
- Spatial scale – where the impacts will occur within the area. Any transboundary effects outside of the study area would also be considered.
- Permanency – whether effects will be permanent or temporary.
- Level of certainty – the level of certainty in the prediction will be classified as low, medium or high.
- Cumulative and synergistic effects.

¹² Barton, Grant and Guise 2003, *Shaping Neighbourhoods: A Guide for Health, Sustainability and Vitality*, Spon Press, London and New York. Note: ppha: persons per hectare

Where negative impacts are identified, measures will be proposed to offset, avoid or otherwise mitigate for the impact. In addition, measures which may further enhance benefits will also be identified as appropriate.

Tables 3-6 and 3-7 provide an explanation of the notation to be used on the assessment matrices.

Table 3-6 Assessment Scale

Major Positive Impact (significant)	The option strongly supports the achievement of the IIA Objectives	++
Positive Impact	This option contributions partially to the achievement of the IIA Objective	+
Neutral/No Impact	There is no clear relationship between the option and/or the achievement of the IIA Objective	0
Positive and negative outcomes	The option has a combination of both positive and negative contributions to the achievement of the IIA Objective.	+/-
Uncertain outcome	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level. More information is required to assess the impacts.	?
Negative Impact	The policy partially detracts from the achievement of the SA Objective.	-
Major Negative Impact (significant)	The policy strongly detracts from the achievement of the SA Objective.	--

Table 3-7 – Notation used to identify types of effects

L-T	Effects likely to arise in 10-25 years of Local Plan implementation
M-T	Effects likely to arise in 5-10 years of Local Plan implementation
S-T	Effects likely to arise in 0-5 years of Local Plan implementation
D	Direct effects.
I	Indirect effects.
R	Effects are reversible
IR	Effects are irreversible
H/M/L	High, medium or low certainty of prediction

4 Stage B: Developing and Refining Options and Assessing Effects

4.1 Alternatives

As identified in Box 3, the SEA Directive requires that the assessment process considers alternatives:

Box 3: Consideration of Alternatives

'..an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated' (2001/42/EC) (Article 5.1).

Government guidance advises that only realistic and relevant alternatives should be considered and they should be sufficiently distinct to enable a meaningful comparison of their different environmental effects. This Draft IIA Report presents the assessment of the strategic plan options as well as the policy options developed as part of the Regulation 18 Local Plan.

4.2 Appraisal of the Strategic Options

As part of the assessment of alternatives, the key strategic options with regards to affordable housing were assessed at the outset. The results of this assessment are presented in **Chapter 5** of this report..

4.3 Assessment of the Spatial Vision

Good practice guidance recommends that the key aims and principles of the plan should be assessed against the IIA Objectives, in order to test their compatibility and to determine whether they accord with broad sustainability principles.

The Spatial Vision for OPDC has been reviewed against the IIA Objectives, and a summary of the key strengths, weaknesses and recommendations are presented in **Chapter 6**. Recommendations were made to offset or alleviate any adverse impacts that were predicted, or to enhance any opportunities that were identified.

4.4 Assessment of the Strategic Objectives

Good practice guidance also recommends that the goals of a plan should be assessed against the SA Objectives. The assessment of the Strategic Objectives of the Local Plan against the SA Objectives has been undertaken using a simple matrix based approach. **Chapter 6** presents the complete compatibility of the Spatial Objectives against the SA Objectives.

4.5 Appraisal of Preferred Policies and Policy Options

The preferred policies and associated policy options were assessed against the IIA Objectives using a matrix based approach. This identified the positive and negative impacts associated with the policies and included mitigation measures to address any predicted adverse impacts. As there is a degree of overlap between the intentions of some of the policies they have been grouped together and the groups of policies, for example, all those relating to Design have been assessed in a single matrix.

The assessment notations used in the assessment, together with their definition (i.e. how a positive score was assigned) are presented in **Chapter 3** and **Appendix G**. When undertaking the assessment, the symbols assigned in the matrix were justified in the commentary box along with any uncertainties.

A summary of the assessment of the appraisal of the Preferred Policies and Options is provided in **Chapter 7**. The complete results of the assessment are presented in **Appendix G**.

4.6 Mitigation

Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Local Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified. Recommendations within Appendix G are italicised for clarity.

As the Regulation 18 Local Plan has been developed in parallel to the SA process, mitigation measures have been incorporated on a continual basis into the Local Plan.

4.7 Appraisal of Cumulative and Synergistic Effects

The SEA Directive requires, *inter alia*, that cumulative effects should be considered. It stipulates the consideration of “*the likely significant effects on the environment...*” and that “*these effects should include secondary, cumulative, synergistic...effects*” (Annex I). The Practical Guide sets out the following definitions for these terms:

- Secondary or indirect effects comprise effects which do not occur as a direct result of the proposed activities, but as a result of complex causal pathway (which may not be predictable).
- Cumulative effects arise from a combination of two or more effects, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan or programme have a combined effect.
- Synergistic effects – synergy occurs where the joint effect of two or more processes is greater than the sum of individual effects.

The potential for cumulative, synergistic or secondary or indirect effects as a result of the Local Plan has been inherently considered within the appraisal, the findings of which are presented in Chapter 7.

4.8 Appraisal of Transboundary Effects

The SEA Directive requires SAs to consider the transboundary effects of the plan on other EU member states. However, it is not considered likely that the Local Plan could have significant effects upon other member states. Transboundary effects are, however, mentioned within the IIA where considered appropriate.

4.9 Technical Limitations and Uncertainties

During the assessment of the Regulation 18 Local Plan, there has sometimes been uncertainty when predicting the potential effects. Where this has occurred, the uncertainty is identified within the appraisal matrices and accompanied by recommendations to mitigate such impacts.

In addition, a number of data gaps are identified within the baseline context where data is unavailable or out of date. Obtaining these datasets would help to further increase the knowledge of the areas, and could potentially be filled through the use of the monitoring framework.

The Regulation 18 Local Plan essentially acts as a guidance document for the future development of OPDC. There is therefore reliance upon future decision-makers to ensure sustainable development is ensured.

5 Appraisal of Strategic Options

5.1 Affordable Housing Approaches

Appendix F includes an assessment of approaches to affordable housing provision. A summary of the assessment findings is presented in **Table 5-1**. The four strategic options considered are briefly described below:

- **Approach 1 – Fixing the percentage:** This option describes an approach whereby a single OPDC wide figure is fixed for the level of affordable housing, subject to a regular review of viability and need. This is an approach supported in Opportunity Areas in the Mayor's draft Housing SPG. For this option OPDC would need to review viability on a regular basis to keep track of market changes. OPDC may also need to consider abnormal costs on specific sites in extreme circumstances and where clearly demonstrated and justified..
- **Approach 2 – Product dependent range:** Under this approach, the option would set a percentage range for each housing type to be provided recognising that some affordable housing products are more costly to deliver than others or are more suited to different types of developments. For example there may be a lower or higher level of affordable housing depending on the type of housing to be provided and the viability/ affordability of this housing.
- **Approach 3 – Viability based percentage:** This is the approach currently implemented by the three boroughs. . A target percentage is set but this target is still subject to viability and each individual scheme would be viability tested to see how much affordable housing it could deliver.
- **Approach 4 – Negotiate a target on site specific basis:** This option seeks the maximum reasonable amount of affordable housing without specifying a percentage target to achieve for each development. A review of relevant economic data and viability for each site, to be provided by the applicant and tested by OPDC, will enable an allocation of affordable housing on the site to be negotiated and determined.

5.1.1 Summary of Assessment

No significant effects were predicted against Approaches 1, 2 and 3 of the assessment. However, significant negative effects were predicted in relation to the assessment of Approach 4, in relation to IIA Objectives: 13 (community cohesion and social exclusion); 14 (safety, crime and the fear of crime); and 15 (health and wellbeing). Without an initial target, negotiated levels of provision could be low. This could increase levels of social exclusion and subsequent knock-on effects for health and anti-social behaviour.

Approach 1 could create a 'level playing field' across the area, which could enable the delivery of affordable housing. This could help to ensure that all areas are 'equal' in terms of provision, which could help distribute affordable housing more evenly across the plan area. This could help to ensure that mixed communities and a sense of place is achieved. However, should this mean that fewer sites are developed, negative effects may result.

The product dependent range (Approach 2) could lead to inequalities across the OPDC area, as some housing 'types', and therefore types of communities, may be seen as more 'suitable' for higher affordable housing provision than others. This could lead to negative effects against some of the sustainability objectives.

A viability based percentage (Approach 3) could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, increasing social exclusion. This approach, however, would include an initial target percentage, which could help negotiations, although it is unclear whether this target percentage would be an all-area percentage or based on different products or areas. A viability-based approach could, alternatively, help to deliver more affordable housing as, should a fixed percentage be required, developers may not develop certain sites due to viability issues. Therefore, a mix of both positive and negative effects is predicted for this approach.

Table 5-1 – Affordable Housing Approaches: Summary of Assessment

Draft IIA Objective (see Table 6-1 of IIA Scoping Report)	Impact			
	Approach 1 – (Single) Fixed contribution across OPDC area	Approach 2 – Product dependent range	Approach 3 – Viability based percentage	Approach 4 – Negotiate a target on site specific basis
1. To enhance the built environment and encourage 'place-making'	0	0	0	0
2. To optimise the efficient use of land through increased development densities and building heights, where appropriate	0	0	0	0
3. Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	0	0	0	0
4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods	0	0	0	0
5. Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	+/-	-	+/-	-
6. Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	0	0	0	0
7. To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	0	0	0	0
8. To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	0	0	0	0
9. Improve the quality of the water environment	0	0	0	0
10. Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	0	0	0	0

Draft IIA Objective (see Table 6-1 of IIA Scoping Report)	Impact			
	Approach 1 – (Single) Fixed contribution across OPDC area	Approach 2 – Product dependent range	Approach 3 – Viability based percentage	Approach 4 – Negotiate a target on site specific basis
11. To minimise air, noise and light pollution, particularly for vulnerable groups	0	0	0	0
12. To conserve and, where appropriate, enhance, cultural heritage	0	0	0	0
13. Increase community cohesion and reduce social exclusion	+/-	-	+/-	--
14. Improve safety and reduce crime and the fear of crime	+/-	-	+/-	--
15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	+/-	-	+/-	--
16. To improve the education and skills levels of all members of the population, particularly vulnerable groups	0	0	0	0
17. Maximise the social and economic wellbeing of the population and improve access to employment and training	0	0	0	0
18. To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	0	0	0	0

6 Appraisal of the Spatial Vision and Objectives

6.1 Appraisal of the Spatial Vision for OPDC

The Regulation 18 Local Plan includes a draft Spatial Vision and objectives, which shape the direction of the Local Plan policies. The Regulation 18 Local Plan draft Spatial Vision is:

“A thriving part of London connected to the UK and internationally. Old Oak and Park Royal will be a centre for innovation and growth that will shape west London and strengthen London’s role as a global city. A new commercial hub with catalyst uses, alongside a diverse network of vibrant neighbourhoods, will help create a London destination recognised as an exemplar in large-scale housing and employment led regeneration.”

The draft spatial vision has been appraised against the 18 IIA Objectives. To ensure it further supports the delivery of the IIA objectives with regard to sustainable modes of transport the following recommendations are made:

6.1.1 Recommendations

- In terms of accessibility and minimising the need to travel, the Spatial Vision could include reference to ‘sustainable’ connections, to infer that the Spatial Vision is based on connectivity through rail links, as opposed to other modes of transport.
- The Spatial Vision could also include reference to ‘sustainable development’, which could infer that development would need to minimise contributions to and adapt to the effects of climate change as well as minimise potential impacts on the environment.
- It is also recommended that ‘healthy’ could be added into the Spatial Vision, to ensure that ‘healthy, vibrant neighbourhoods’ are encouraged.

6.2 Appraisal of the Objectives

The Objectives for the Regulation 18 Local Plan set out how the Spatial Vision could be achieved. They express the purpose of the Local Plan and what it aims to achieve. They embrace the aims and objectives of other key strategies important to OPDC. The Objectives included for assessment are as follows:

Consolidating

1. Optimise a once in a life-time opportunity created by High Speed 2 and Crossrail to secure investment that will:
 - a. deliver a thriving new centre at Old Oak with much needed homes, a mix of employment space and associated social and physical infrastructure;
 - b. protect and regenerate the Park Royal industrial area as a cornerstone of the London economy

Connecting

2. Accessible and high quality national, regional and local transport connections, focused around a new world class station at Old Oak Common will catalyse comprehensive regeneration with well-designed streets that will fully connect into surrounding areas.

Creating

3. Deliver a varied mix of uses, including cultural and catalyst uses that supports the growth of a vibrant London destination.
4. Celebrate existing features of the Grand Union Canal, Wormwood Scrubs, Park Royal, heritage assets, and local communities to help create a unique sense of place.
5. Utilise the scale of opportunity to embed and showcase exemplar standards of design, smart technology, environmental, social and economic sustainability, during the planning, construction and operation stages.

6. Be flexible and adaptable, both to the effects of a changing climate, and future changes in practices, including the circular economy and deliver an open and secure digital place.

Communities

7. Create a series of connected and inclusive neighbourhoods, designed to improve the quality of life, enhance health and well-being, deliver social and economic benefits for local communities and foster a sense of community and diversity.

6.3 Appraisal Findings

Table 6-1 presents the compatibility of the Regulation 18 Local Plan Objectives against the IIA Objectives. The assessment can be summarised as follows:

Objective 1: Consolidating (*Optimise a once in a life-time opportunity created by High Speed 2 and Crossrail to secure investment*)

The two flagship projects High Speed 2 and Crossrail look to secure investment for London and should contribute economically to the growth of the Old Oak and Park Royal areas of West London. The presence of a Crossrail station will be one of the most important transport connections to the site, providing a significant increase in rail capacity to the West End, City and Canary Wharf. Crossrail will provide excellent regional and sub-regional connectivity to Old Oak. A thriving new centre at Old Oak should help improve the built environment and encourage 'place-making'. The new centre is an example of optimising development opportunities to develop and enhance local distinctiveness and character. This objective will also contribute towards the delivery of new homes in Old Oak that will provide associated social and physical infrastructure to meet identified local needs. The mixed use development will provide employment and leisure opportunities for the Old Oak residents and encourage future investment into the area. The objective also seeks to protect and regenerate the Park Royal industrial area that will help maintain the character and identity of this industrial hub of the London economy. The location of this investment should encourage employers to adopt the London Living Wage and direct employment to local people with a diverse range of skills. The provision of retail stores at Old Oak are also compatible with the IIA sub objective to help small local businesses and social enterprises. The surrounding infrastructure will ensure the new facilities are accessible.

Objective 2: Connecting (*Accessible and high quality national, regional and local transport connections, focused around a new world class station at Old Oak Common, which will catalyse comprehensive regeneration and connect with surrounding areas*)

High quality national, regional and local transport connections are focused around a new world class station at Old Oak Common will provide excellent accessibility and sustainable travel movement for residents and visitors to this area of West London. The new Old Oak Common station and surrounding interchange will be the key driver for development in the area and will be the focus of future transport connections. These new connections are compatible with IIA objective 4 to increase the opportunity for the transport of goods and people by rail transport and maximising the accessibility of rail stations. The connections will not only provide access to the retail and commercial area of OPDC, they will provide a more accessible network for many new homes proposed as part of the development. The objective will also support the aim to increase the net number of businesses registered in the area and the relocation of business from Old Oak to Park Royal due to the high quality transport connections. Over the long term, this will help to regenerate the area as the infrastructure provides a catalyst for inward investment and new residents.

Recommendation: It is recommended that the objective includes reference to sustainable regeneration. This would reduce demonstrate OPDC's aspiration to address disparities in economic performance and promote sustainable movement.

Objective 3: Creating (*Deliver a varied mix of uses that supports the growth of a vibrant London destination*)

The objective seeks to encourage a mix of uses that will support the vibrant growth of London. The IIA objective aims to encourage the development of employment growth sectors including clean, green and healthy businesses. Despite this desire the objective must be conscious not to deliver retail negatively impacts on neighbouring town centres.

Objective 4: Creating (*Celebrate existing features of the Grand Union Canal, Wormwood Scrubs, Park Royal, Heritage assets, and local communities to help create a unique sense of place*)

Previous objectives seek to create new places and landmarks, however this objective wants to preserve some of the environmentally significant landmarks that exist in the area. The IIA objective seeks to reduce the potential wide ranging impact on these sites and conserve existing biodiversity across the plan area. For example, the Grand Union Canal has heritage assets to promote and this can be done through the use of multifunctional green infrastructure. There is an opportunity to enhance greenspace in connection with areas such as Grand Union Canal and Wormwood Scrubs to benefit the local community and create a unique sense of place.

Recommendation: It is recommended that the existing features in the area could provide an opportunity for tourism and leisure.

Objective 5: Creating (*Utilise the scale of opportunity to embed and showcase exemplar environmental, social and economic standards during planning, construction and operation*)

Due to the scale of the development at Old Oak and Park Royal, there is an opportunity to showcase planning, construction and maintenance methods of best practice. The impact of construction on the surrounding businesses and communities is very important during any development. This may include mitigating the impacts of noise, air or light pollution by reducing emissions from construction and demolition sites. One example of best practice highlighted in an IIA objective is the use of sustainable design compared with standard construction to demonstrate energy usage and potential energy savings. This would also apply to the use of recycled materials and natural resources to minimise waste production during construction. The construction process needs to be managed to reduce the impact of a potentially large construction workforce on the local community, specifically in relation to social infrastructure and housing provision. These measures should also apply during operation of a building to ensure the users and those potentially affected are not harmed or disturbed.

Recommendation: It is recommended that the objective includes reference to preservation and enhancement of green spaces and building a network of green spaces. This would ensure that healthier living through a connected green infrastructure strategy for health.

Objective 6: Creating (*Be flexible and adaptable, both to the effects of a changing climate, and future changes in practices, including the circular economy, that delivers an open and secure digital place*)

The importance of climate change and any other potential external factors that may affect practice need to be addressed with flexibility and adaptability. The IIA objective highlights methods such as minimising the proportion of new development at risk of flooding and sustainable design to include urban drainage, natural ventilation and adaptable to temperature change. Other compatible objectives include enabling the area to be more self-sufficient to monitor energy generation storage and promote the creation of a circular economy for the management of waste.

Recommendation: It is recommended that the objective includes reference to embracing the circular economy to embed resilience. This would present opportunities of more jobs and industries and solutions for local people to minimise energy use. This could create greater investment in community infrastructure projects.

Objective 7: Communities (*Create a series of connected and inclusive neighbourhoods, designed to improve the quality of life, enhance health and well-being and deliver benefits for local communities. Integrated with their surroundings, new development will foster a sense of community and diversity*)

The objective seeks to create a series of connected and inclusive neighbourhoods. The most important factors in creating good communities are sustainable high quality access, community facilities, employment, recreational/leisure spaces, prevention of social exclusion and equality. The IIA objectives also highlight the importance of community cohesion by improving the quality of the public realm and the provision of quality public open spaces. There needs to be good accessibility to social infrastructure, formal/informal education and training opportunities.

Recommendation: It is recommended that the objective considers using the term social cohesion rather than “fostering a sense of community” and references sustainable lifestyles. This would ensure that all communities are equitable, especially those liable to discrimination, poverty and social exclusion.

Table 6-1 Compatibility of the Local Plan Objectives with the IIA Objectives

Key

✓ = Objectives are compatible

✗ = Objectives are potentially incompatible

0 = There is no link between objectives

? = The link between the objectives is uncertain

IIA Objective		Objectives						
		1	2	3	4	5	6	7
1	To enhance the built environment and encourage 'place-making'	✓	✓	✓	?	?	✓	✓
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	✓	?	?	0	✓	?	0
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	✓	?	?	0	✓	?	0
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	✓	✓	✓	✓	?	✓	✓
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	✓	✓	✓	✓	?	✓	✓
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	?	?	?	✓	✓	✓	?
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	?	?	✓	✓	✓	?	?
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	?	?	?	✓	✓	✓	?
9	Improve the quality of the water environment	?	0	?	?	✓	?	?
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	?	0	?	✓	✓	?	?
11	To minimise air, noise and light pollution, particularly for vulnerable groups	✓	✓	?	0	✓	?	?
12	To conserve and enhance the historic environment, heritage assets and their settings	✓	0	?	✓	✓	?	0

IIA Objective		Objectives						
		1	2	3	4	5	6	7
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	✓	?	?	✓	✓	?	✓
14	Improve safety and reduce crime and the fear of crime	?	?	?	0	✓	0	✓
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	?	?	?	✓	✓	?	✓
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	?	0	?	0	✓	✓	✓
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	✓	?	?	0	✓	✓	✓
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	✓	✓	✓	✓	✓	✓	✓

7 Appraisal of Regulation 18 Local Plan Policies and Options

This Chapter provides a summary of the results of the IIA of the Regulation 18 Local Plan, dated 15th December 2015. The detailed results of the assessments of the Policies and options, are presented in **Appendix G**. The policy wording can be found in the Regulation 18 Local Plan which accompanies this Draft IIA Report for consultation. As noted earlier in this report, the assessments have been grouped by Local Plan chapter. As such, this is how the assessment is presented in this section.

7.1 The Overarching Spatial Policies

The Policies included within **Table G-1** of **Appendix G** are as follows:

- OSP 1: Optimising growth
- OSP 2: Land use
- OSP 3: Connections and open spaces
- OSP 4: Densities and building heights
- OSP 5: Places

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix G**. A summary of the key IIA findings is presented below. In order to improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix G**.

7.1.1 Summary of Assessment

The majority of effects against the policy component are predicted to be positive. No major negative effects were predicted against the IIA Objectives. Major positive effects are predicted for the following IIA Objectives:

- 1 (To enhance the built environment and encourage 'place-making') – Policies OSP2, OSP3 and OSP5;
- 2 (To optimise the efficient use of land through increased development densities and building heights, where appropriate) – Policy OSP1;
- 3 (Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land) – Policies OSP1; OPS2 and OPS4;
- 4 (Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network) – Policies OSP1, OSP2, OSP3, and OSP4;
- 5 (Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs) – Policy OSP2;
- 7 (To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy) – Policy OSP3;
- 12 (To conserve and enhance the historic environment, heritage assets and their settings) – Policies OSP3; and OSP5;
- 13 (Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare) – Policies OSP3 and OSP5;
- 15 (Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living) – Policy OSP3;
- 16 (To improve the education and skills levels of all members of the population, particularly vulnerable groups) – Policy OPS2; and
- 17 (Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training) – Policy OSP5.

7.2 The Places

The Policies included within **Table G-2** of **Appendix G** are as follows:

- P1 Old Oak South

- P2 Old Oak North
- P3 Old Oak High Street
- P4 Grand Union Canal
- P5 Park Royal
- P6 Park Royal Centre
- P7 North Acton
- P8 Scrubs Lane
- P9 Old Oak West
- P10 Wormwood Scrubs

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix G**. A summary of the key IIA findings is presented below. In order to improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix G**.

7.2.1 Summary of Assessment

The majority of effects against the policy component are predicted to be positive. No significant negative effects have been predicted. Major positive effects are predicted for the following IIA Objectives:

- 1 (To enhance the built environment and encourage 'place-making') – Policies P1; P2; P3; P4; P5; P6; P7; P8; P9; and P10;
- 2 (To optimise the efficient use of land through increased development densities and building heights, where appropriate) – Policies P1; P2; P3; P4; P5; P6; P7; P8 and P9;
- 3 (Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land) – Policies P1; P2; P3; P4; P5; P6; P7; P8; and P9;
- 4 (Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network) – Policies P1; P2; P3; P4; P5; P6; P7; P8; P9; and P10;
- 5 (Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs) – Policy P7;
- 10 (Create and enhance biodiversity and the diversity of habitats across the area and its surroundings)- Policies P5; and P10;
- 12 (To conserve and enhance the historic environment, heritage assets and their settings) – Policies P4; and P8;
- 13 (Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare) – Policies P1; P3; P4; P6; P7; P8 and P10;
- 14 (Improve safety and reduce crime and the fear of crime) – P3; P4; P6; and P7;
- 15 (Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living) – Policy P10;
- 16 (To improve the education and skills levels of all members of the population, particularly vulnerable groups) – Policy P7; and
- 18 (To encourage inward investment alongside investment within existing communities, to create sustainable economic growth) – P1; P2; P5; P6; P7; P8; and P9.

7.3 Sustainable development

The Policies included within **Table G-3** of **Appendix G** are as follows:

- SD1: Sustainable development

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix G**. A summary of the key IIA findings is presented below. In order to improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix G**.

7.3.1 Summary of Assessment

The majority of effects against the policy component are predicted to be positive. No major negative effects were predicted against the IIA Objectives. Only one major positive effects was predicted for the following IIA Objective: 18 (To encourage inward investment alongside investment within existing communities, to create sustainable economic growth).

7.4 Design

The Policies included within **Table G-4 of Appendix G** are as follows:

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

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix G**. A summary of the key IIA findings is presented below. In order to improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix G**.

7.4.1 Summary of Assessment

The majority of effects against the policy component are predicted to be positive. No major effects, either positive or negative, were predicted for policies D3, D4, D5, D7 and D8. Major positive effects are predicted for the following IIA Objectives:

- 1 (To enhance the built environment and encourage 'place-making') – Policies D1 and D2;
- 5 (Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs) – Policy D1;
- 12 (To conserve and enhance the historic environment, heritage assets and their settings) - Policy D6; and
- 14 (Improve safety and reduce crime and the fear of crime) – Policy D1.

7.5 Housing

The Policies included within **Table G-5 of Appendix G** are as follows:

- H1: Strategic Policy for Housing
- H2: Housing supply
- H3: Housing mix
- H4: Affordable housing
- H5: Existing housing
- H6: Housing in the Private Rented Sector
- H7: Housing with shared facilities
- H8: Specialist housing for older people and/or vulnerable people
- H9: Gypsy and Travellers accommodation
- H10: Student housing

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix G**. A summary of the key IIA findings is presented below. In order to

improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix G**.

7.5.1 Summary of Assessment

The majority of effects against the policy component are predicted to be positive. No major effects, either positive or negative, were predicted for policies H4; H5; H6; H7; H9; and H10. No major negative effects were predicted against the IIA Objectives. Major positive effects are predicted for the following IIA Objectives:

- 1 (To enhance the built environment and encourage 'place-making') – Policy H1;
- 5 (Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs) – Policies H1; H2; and H3;
- 13 (Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare) – Policies H1;H3; and H8;
- 15 (Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living) – Policy H1.

7.6 Employment

The Policies included within **Table G-6** of **Appendix G** are as follows:

- E1: Strategic Policy: Delivering a diverse economy
- E2: Old Oak
- E3: Park Royal
- E4: Open workspaces
- E5: Local access to employment and training

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix G**. A summary of the key IIA findings is presented below. In order to improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix G**.

7.6.1 Summary of Assessment

The majority of effects against the policy component are predicted to be positive. No major effects, either positive or negative, were predicted for Policy E4. No major negative effects were predicted against the IIA Objectives. Major positive effects are predicted for the following IIA Objectives:

- 16 (To improve the education and skills levels of all members of the population, particularly vulnerable groups) – Policy E5;
- 17 (Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training) – Policy E1; E2; E3; and E5;
- 18 (To encourage inward investment alongside investment within existing communities, to create sustainable economic growth) – Policy E1; E2; and E3.

7.7 Town Centre Uses

The Policies included within **Table G-7** of **Appendix G** are as follows:

- TC1: Strategic Policy: Town centre uses
- TC2: Town centre hierarchy
- TC3: Vibrancy
- TC4: Retail and eating and drinking establishment needs
- TC5: Culture, sports and leisure facilities
- TC6: Visitor accommodation
- TC7: Hours of operation for night time economy uses

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix G**. A summary of the key IIA findings is presented below. In order to improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix G**.

7.7.1 Summary of Assessment

The majority of effects against the policy component are predicted to be positive. No major negative effects were predicted against the IIA Objectives. Major positive effects are predicted for the following IIA Objectives:

- 1 (To enhance the built environment and encourage 'place-making') – Policies TC1; TC2; TC3; TC4; and TC7;
- 2 (To optimise the efficient use of land through increased development densities and building heights, where appropriate) – Policy Option TC4 Option 1;
- 3 (Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land) – Policy TC2; and Policy Option TC4 Option 1;
- 4 (Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network) – Policies TC2; TC3; TC3 Option 1; TC4; and TC6;
- 13 (Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare) – Policies TC1; TC3; and TC4;
- 15 (Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living) – Policy TC5;
- 16 (To improve the education and skills levels of all members of the population, particularly vulnerable groups) – Policy TC5;
- 17 (Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training) – Policies TC1; TC2; TC2 Policy Option 1; and TC5;
- 18 (To encourage inward investment alongside investment within existing communities, to create sustainable economic growth) – Policies TC1 and TC7.

7.8 Social Infrastructure

The Policies included within **Table G-8** of **Appendix G** are as follows:

- SI1: Strategic Policy: Social infrastructure
- SI2: Educational
- SI3: Health
- SI4: Community facilities
- SI5: Public houses

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix G**. A summary of the key IIA findings is presented below. In order to improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix G**.

7.8.1 Summary of Assessment

The majority of effects against the policy component are predicted to be positive. No major negative effects were predicted against the SA Objectives. Major positive effects are predicted for the following IIA Objectives:

- 1 (To enhance the built environment and encourage 'place-making') – Policies SI4; and SI5;
- 2 (To optimise the efficient use of land through increased development densities and building heights, where appropriate) – Policies SI1 and SI1 Option 1; and SI3;
- 3 (Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land) – Policies SI1;
- 4 (Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation) – Policies SI2 and SI2 Option 1; SI3; and SI4;

- 12 (To conserve and enhance the historic environment, heritage assets and their settings) – Policy SI5;
- 13 (Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare) – Policies SI1; SI2; SI4; and SI5;
- 15 (Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living) – Policy SI1 and SI1 Option 1; and SI3;
- 16 (To improve the education and skills levels of all members of the population, particularly vulnerable groups) – Policies SI2; and SI3;
- 17 (Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training) – Policies SI1 Option 1; and SI2;
- 18 (To encourage inward investment alongside investment within existing communities, to create sustainable economic growth) – Policies SI4 and SI5.

7.9 Transport

The Policies included within **Table G-9** of **Appendix G** are as follows:

- T1: Strategic Policy for Transport
- T2: Walking
- T3: Cycling
- T4: Rail
- T5: Buses
- T6: Roads and streets
- T7: Parking
- T8: Freight, servicing and deliveries
- T9: Construction
- T10: Transport Assessments and Travel Plans

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix G**. A summary of the key IIA findings is presented below. In order to improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix G**.

7.9.1 Summary of Assessment

The majority of effects against the policy component are predicted to be positive. No major effects, either positive or negative, were predicted for Policies T6; T8 and T10. Major positive effects are predicted for the following IIA Objectives:

- 4 (Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network) – Policies T1; and T4;
- 8 (To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste) – Policy T9;
- 11 (To minimise air, noise and light pollution, particularly for vulnerable groups) – Policy T1;
- 13 (Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare) – Policy T5;
- 15 (Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living) – Policies T1; and T2;
- 16 (To improve the education and skills levels of all members of the population, particularly vulnerable groups) – Policy T5;
- 17 (Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training) – Policies T3 and T4;
- 18 (To encourage inward investment alongside investment within existing communities, to create sustainable economic growth) – Policy T1 Option 1; T2; T3; T4; and T7.

Significant negative effects were predicted against the following IIA Objective:

- 11 (To minimise air, noise and light pollution, particularly for vulnerable groups) – Policy T8 Option 1.

7.10 Environment and Utilities

The Policies included within **Table G-10** of **Appendix G** are as follows:

- EU1: Strategic Policy for the environment and utilities
- EU2: Smart
- EU3: Water
- EU4 Waste management
- EU5: Waste minimisation, and use as a resource
- EU6: Energy
- EU7: Digital communications infrastructure
- EU8: Green infrastructure and biodiversity
- EU9: Extraction of minerals
- EU10: Air quality
- EU11: Noise
- EU12: Land contamination

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix G**. A summary of the key IIA findings is presented below. In order to improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix G**.

7.10.1 Summary of Assessment

The majority of effects against the policy component are predicted to be positive. No major effects, either positive or negative, were predicted for policies EU2; EU4; EU7; EU9; EU10; and EU11. No major negative effects were predicted against the SA Objectives. Major positive effects are predicted for the following IIA Objectives:

- 1 (To enhance the built environment and encourage 'place-making') – Policy EU8;
- 3 (Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land) – Policy EU12;
- 6 (Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect) – Policies EU1; EU3; EU5; EU6; and EU8;
- 7 (To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy) – Policy EU6 and EU6 Option 1;
- 8 (To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste) – Policies EU1; and EU5;
- 9 (Improve the quality of the water environment) – Policy EU3;
- 10 (Create and enhance biodiversity and the diversity of habitats across the area and its surroundings) – Policy EU8;
- 12 (To conserve and enhance the historic environment, heritage assets and their settings) – Policy EU8;
- 15 (Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living) – Policy EU1; and
- 17 (Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training) - Policy EU1.

7.11 Habitats Regulations Assessment Screening

An initial HRA screening exercise, undertaken in parallel to this IIA, concludes the following:

'This HRA Screening of the OPDC Regulation 18 Draft Local Plan has considered the potential implications of the plan for European Sites within 20km of the OPDC area boundary.

It is important to note that none of the policies set out in the OPDC Local Plan would lead to direct impacts upon European Sites.

The closest European site is more than 7km from the OPDC boundary. It is considered that potential effects are very unlikely to be significant, given the distance between the European Sites and the developments likely to arise from the OPDC Local Plan policies, as well as the standard mitigation measures that are required of such developments (such as pollution prevention).

The assessment of in-combination effects of various plans and policies revealed that it is not considered that the OPDC Local Plan would contribute to significant in-combination effects.'

7.12 Cumulative Effects

Table 7-1 Cumulative Effects

Receptor	Cumulative / Synergistic Effect	Causes	Potential Trend
Crime Rates and Fear of Crime	Crime and fear of crime may reduce in response to wider regeneration initiatives in addition to the Local Plan provisions.	Regeneration provisions would also contribute to improved aspirations and environments in conjunction with the proposals in the Local Plan. This may reduce crime and fear of crime levels in the long-term.	Positive
Health of the Borough's population	Levels of health and well-being have the potential to improve in the long term.	Cumulative measures to promote walking and cycling together with co-location of jobs, homes and accessible greenspace can benefit healthy lifestyles and wellbeing.	Positive
Housing Provision	Housing will be provided to meet local needs and would contribute to regional targets.	The Local Plan would contribute to meeting regional housing needs.	Positive
Access to goods and services	Access to services and facilities for local people and visitors would be improved.	Sustainable accessibility across the area and connecting to the wider boroughs is a key feature of the Local Plan.	Positive
Sustainable Economic Growth	The Local Plan would help facilitate employment creation, business development and economic growth.	The efforts of all the plans would help to raise the image of the area and attract inward investment. The development of employment sites would help to meet regional needs.	Positive
Economic Inclusion	Promotion of employment in areas of high employment / income deprivation.	Improved accessibility within the area as a whole, with improved public transport and walking / cycling opportunities and co-location of jobs and homes, should ensure easy access to employment for all.	Positive
Biodiversity	The Local Plan seeks to ensure protection of biodiversity resources. However, potential negative impacts could occur as a result of development within some brownfield sites.	While the Local Plan seeks to encourage biodiversity enhancements, the overall quantum of development could have negative effects.	Positive and Negative
Townscape Quality	Protection and enhancement of	The Local Plan seeks to encourage the	Positive

Receptor	Cumulative / Synergistic Effect	Causes	Potential Trend
	landscape and townscape through regeneration of town centres and brownfield sites.	development of a significant brownfield site, which could lead to significant benefits against this objective.	
Heritage Assets	Heritage assets would be directly affected by the Local Plan, and there is potential for undesignated heritage assets to be affected also.	Undesignated heritage assets should be identified and a suitable strategy developed ahead of the commencement of development, otherwise potentially negative effects could result.	Uncertain
Climate Change Air Quality Energy Efficiency Natural Resources Sustainable Transport	<p>Potential negative effects of traffic growth, or positive effects from a reduction in congestion and improved connectivity.</p> <p>Potential negative and positive contributions towards climate change.</p> <p>Potential positive effects as a result of promotion of sustainable travel.</p> <p>The prudent use of natural resources.</p>	<p>The Local Plan requires housing and employment growth which will all lead to an increase in resource use, emissions and traffic generation. However, the plan seeks to promote development near to existing centres and transport hubs and to promote sustainable travel modes. Energy projects relate to low-carbon sources of energy.</p> <p>Potential flood risk within the provision of specific measures to reduce this, could lead to significant cumulative negative effects.</p>	Positive and negative

8 Next Steps

This Draft IIA Report has now been issued for consultation alongside the Regulation 18 Local Plan to all key stakeholders (including statutory consultees and the public) for comment. The Regulation 18 Local Plan along with this accompanying IIA Report and associated appendices will be consulted on for eight weeks. Following the close of the consultation period, OPDC will review the feedback and revise the Plan as appropriate. The IIA Report will then be updated to reflect the assessment of these amendments or additions prior to the Regulation 19 Local Plan being published. The IIA Report will also include aspects relating to the SA process, such as a draft Monitoring Framework, as outlined in **Table 2-1** of this report. The next consultation on the IIA Report will be undertaken alongside the consultation on the Regulation 19 Local Plan.

If you would like to comment on this Draft IIA Report, please send comments to:

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