

Themed Policies from OPDC Local Plan with comments (from GUA model response to the OAPF, community based vision and objectives, the community charrette and GUA event on 16th March) and some questions – for GUA meeting 21st March.

Design (p2)

Employment (p6)

Environment and utilities (p12)

Housing (p21)

Social infrastructure (p30)

Sustainable development (p33)

Town Centres (p34)

Transport (p41)

DESIGN - p. 125-152	Community Comments – from previous GUA responses, the OPDC workshops and GUA meeting of 16 th March
<p><u>D1: Strategic policy for design</u> Proposals will be supported where they demonstrate the delivery of exemplar world class architectural and landscape design quality that: a) responds to and enhances positive elements of existing local character and context; and b) contributes to creating new character areas for places and neighbourhoods for locations within Old Oak, where appropriate.</p>	<p><u>Alter the first sentence to:</u></p> <ul style="list-style-type: none"> Proposals will be supported where they demonstrate the delivery of high quality sustainable architecture to be delivered in high quality liveable and inclusive sustainable neighbourhoods that are accessible to all ages and income groups that responds to(two bullet points are OK) <p><i>(from model response to OAPF and community based vision and objectives)</i></p>
<p><u>D2: Streets and public realm</u> a) OPDC will work with stakeholders to deliver an exemplarily designed, welcoming, safe, resilient, flexible, inclusive and sustainable public realm network that facilitates the use and enjoyment of spaces while responding to local character and integrating with surrounding areas. b) Proposals will be required to: i. contribute to, or improve, the network of streets as set out in the Places Chapter; ii. contribute to connecting places together and breaking down severance; iii. contribute to improving the quality of existing and creating new public realm; iv. deliver public realm and street furniture that responds to and / or contributes to the delivery of new and improved local character areas; v. be supported by a clear and robust public realm management and maintenance strategy; vi. support wayfinding, in particular to key destinations; vii. enable the coordinated design, delivery and management of utilities infrastructure and emerging technology; and viii. demonstrate engagement with the Mayor’s Office for Policing and Crime, the local Metropolitan Police Crime Prevention Design Advisor and other relevant emergency services. c) Proposals for advertisements will be required to have a: i. positive impact on associated buildings and surroundings; and ii. neutral or positive contribution to amenity and public safety.</p>	<p><u>Add</u></p> <ul style="list-style-type: none"> A commitment to separating walking, cycling (to protect children, elderly and disabled people), private, and public vehicles in all streets and public realms should be included. Permeability and legibility need to be balanced with creating enclosing neighbourhoods where children and older people can feel safe; where adequate community-oriented facilities and meeting places are provided. Street design needs to sensitively support a balance in the provision of local services and retail, with those dedicated to the potentially lucrative activities to service high footfalls. <i>(should this specify the S end of the high street)?</i> Develop a strategy for high quality hard and soft landscaping throughout the OPDC area. <u>Change</u> - (b)ii – ‘contribute sensitively to connecting places within and immediately neighbouring the OPDC area and creating new public realm’ <p><i>(from model response to OAPF and community based vision and objectives and meeting 16th March)</i></p>

<p>D3: Open space</p> <p>a) OPDC will work with stakeholders to create a network of public open spaces by:</p> <ul style="list-style-type: none"> i. safeguarding and / or enhancing existing public open spaces; and ii. creating and connecting new public open spaces to meet identified need. <p>b) Proposals will be required to:</p> <ul style="list-style-type: none"> i. deliver, improve and / or contribute to the delivery of new public open spaces identified in the Places Chapter; ii. deliver public and communal open spaces that are supported by a clear and robust management and maintenance strategy; iii. deliver temporary public open spaces that contribute to the vitality, character and activation of an area and supports the delivery of permanent development; iv. enhance existing public open space; and v. deliver private and communal open space to support the needs of residents. 	<p><u>Add</u></p> <ul style="list-style-type: none"> • To (v)of all age and incomes • Locate dedicated new large and small scale green and open space for play, recreation, healthy exercise, meeting places, greenery, urban wildlife within and adjacent to housing developments. • These need to be flexible and adaptable. • Work with neighbouring boroughs to create additional green corridors, spaces and biodiversity provision throughout and around the OPDC area to mitigate the impact of development and enhance nature • Provide adequate green spaces to meet the required standards for the scale of new development planned for the Old Oak area will be provided within the Old Oak area, excluding the Scrubs from any such calculation • <i>Should the Scrubs and the canal be mentioned specifically in terms of 'safeguarding'?</i> <p><i>(from model response to OAPF and community based vision and objectives)</i></p>
<p>D4: New buildings</p> <p>Design</p> <p>a) OPDC will work with partners and stakeholders to promote the delivery of world-class exemplarily designed and sustainable new buildings.</p> <p>Density</p> <p>b) Proposals will be required to:</p> <ul style="list-style-type: none"> i. deliver densities in accordance with those identified in OSP4, the employment policies and the Places Chapter, that contribute to delivering high quality environments for all; ii. demonstrate successful delivery of social infrastructure, other relevant uses and building servicing within a high density context; <p>Tall buildings</p> <p>c) Proposals for tall buildings will be required to:</p> <ul style="list-style-type: none"> i. accord with OSP4; ii. contribute to the delivery of a visually engaging and coherent skyline; iii. accord with relevant guidance for RAF Northolt safeguarding zones. 	<p><i>Should this policy be about buildings and neighbourhoods or should there be another policy specifically on neighbourhoods or 'lifetime neighbourhoods in the Old Oak and Park Royal?</i></p> <p><u>Add to section (a)</u></p> <ul style="list-style-type: none"> • Create neighbourhoods that have a sense of community ownership and security where children and older people can feel safe; provide adequate community-oriented facilities and meeting places to support engaged and empowered communities. • Create adaptable and imaginative buildings that are designed to last for 150 years and use best materials and techniques in terms of sustainability. • Create neighbourhoods that are all inclusive, thriving, human and beautiful, providing for whole communities with the spiritual makers, facilitators, educators and carers at their heart.

<p>iv. achieve the highest standards of design; and</p> <p>v. be mindful of their surrounding context.</p> <p>Local views</p> <p>d) Proposals will be required to demonstrate how they provide positive contributions to the character and composition of local views.</p> <p>Materials</p> <p>e) Proposals will be required to comprise details and materials that:</p> <p>i. are robust and durable;</p> <p>ii. complement positive elements of the existing character; and</p> <p>iii. positively contribute to the development of a new coherent character and series of places.</p>	<p><u>Comment -</u></p> <ul style="list-style-type: none"> • There is no appetite for extensive high rise development. • The objective <i>tall buildings</i> should be removed to focus on optimising densities. • concern that the high-rise and density buildings ruining the skylines and are affecting liveability • If it is necessary to have high rise buildings they will need to be of high quality design (those at North Acton are low quality. • Tall buildings must be kept away from the Scrubs • Will the high-rise blocks be left empty? • High levels of density will not facilitate the family homes sized homes needed • Question where the housing targets came from in the first place. • Question levels of housing density. <p><i>(from model response to OAPF and community based vision and objectives, the OPDC design and heritage workshop and GUA meeting of 16th March</i></p>
<p>D5: Alterations and extensions</p> <p>a) Proposals for alterations and extensions will be required to:</p> <p>i. respect and / or improve the architectural quality of the existing building and the character of its setting;</p> <p>ii. be appropriate to the scale, form, height and mass of the existing building and any surrounding buildings;</p> <p>iii. relate sympathetically to any other sensitive sites that will be affected; and</p> <p>iv. have neutral or positive impact on local views.</p> <p>b) Proposals for replacement shopfronts or alterations to existing shopfronts will be required to:</p> <p>i. relate sympathetically to the upper parts of the building and the part of the shopfront to be retained in terms of the design and materials;</p> <p>ii. not result in the loss or partial loss of shopfronts which are of architectural interest; and</p> <p>iii. provide open and active frontages to the public realm.</p>	

<p>D6: Heritage</p> <p>a) OPDC will work with Historic England and stakeholders to:</p> <ul style="list-style-type: none"> i. identify, conserve, enhance and improve access to the historic environment, heritage assets and their settings where appropriate; ii. ensure heritage assets contribute to improving and creating a sense of place; and iii. address Heritage at Risk. <p>b) Proposals will be required to conserve and / or enhance the significance of heritage assets to contribute to successful place-making.</p>	<p><u>Add</u></p> <ul style="list-style-type: none"> • (iv) 'survey' and create a local list of buildings of merit' • (v) 'memorialise the local vernacular industrial and social heritage' • (vi) facilitate community ownership of strategies and places (including a canal-side hub) on the history and culture of the area • to 9 (b) 'Proposals will be required to conserve and/or enhance the significance of heritage, contribute to respecting and celebrating the proud (industrial) history of the area as a starting point for new development and contribute to successful place-making <p><i>(from model response to OAPF and community based vision and objectives, the December community charette and GUA meeting of 16th March)</i></p>
<p>D7: Amenity</p> <p>a) OPDC will work with stakeholders to ensure that development delivers a high level of amenity and high quality environment for building users in and around Old Oak and Park Royal; and</p> <p>b) Proposals will be required to demonstrate that they achieve appropriate levels of:</p> <ul style="list-style-type: none"> i. privacy for workspaces and habitable rooms; and ii. non-reflected daylight and sunlight. 	
<p>D8: Inclusive design</p> <p>a) OPDC will work with stakeholders to promote and deliver an exemplarily inclusive and accessible designed environment for Old Oak, Park Royal and Wormwood Scrubs.</p> <p>b) Proposals will be required to meet the highest standards of accessible and inclusive design by:</p> <ul style="list-style-type: none"> i. delivering accessible design solutions that contribute to addressing existing barriers; ii. seeking to exceed latest guidance on accessible and inclusive design; and iii. engaging with relevant stakeholders to inform proposals at the earliest opportunity 	<p><u>Add to</u></p> <ul style="list-style-type: none"> • (a) after inclusive 'in terms of both age and income'

EMPLOYMENT	Community Comments – from previous GUA responses, the OPDC workshops and GUA meeting of 16 th March
<p><u>E1: Strategic policy for employment</u></p> <p>Preferred Policy Option</p> <p>OPDC will work with stakeholders to deliver a sustainable and robust local economy that promotes Old Oak and Park Royal as a place for enterprise and innovation and which contributes to London's economic growth. This will be achieved by:</p> <p>a) establishing Old Oak as a recognised commercial hub;</p> <p>b) consolidating Strategic Industrial Location (SIL) at Park Royal;</p> <p>c) supporting proposals that deliver economic growth by:</p> <p>i. contributing to delivering a range of employment uses in areas outside of SIL to support the delivery of 55,000 new jobs; and</p> <p>ii. contributing to delivering a range of industrial uses within Park Royal's SIL and the area's intensification to accommodate 10,000 new jobs.</p>	<p>General previous comments have mostly been around the need to identify what kinds of jobs and who might be able to access them; that 'care needs to be taken to protect and encourage the kinds of jobs which local people can access. A good match between local skills and local jobs should reduce travel needs and contribute to a sustainable future for London.'</p> <p>Comments made at previous meetings – particularly around the OAPF –</p> <ul style="list-style-type: none"> • Build on existing and emerging successful business with clear links to and integration with the Park Royal SIL and to neighbouring opportunities. • Sustain and enhance existing valued services (including hospitals and existing retail shops). • Maximise potential spin off from existing and new academic centres, including Central Middlesex Hospital - relating to advanced manufacturing, medical research, robotics. • Support development of new incubator light industrial units. • Encourage development of further education facilities to support apprenticeship schemes relevant to Park Royal industries • Protect affordable business units / premises. • Accommodate displaced businesses from Old Oak to Park Royal • contribute to meeting the needs of more deprived communities in and around the OPDC area? <p>Also - in terms of targets and monitoring</p> <ul style="list-style-type: none"> • Ensure that 30% of jobs are for local people, particularly from deprived sections of the community in and around the OPDC area, including during construction phases to support pedestrian movement to and through the OPDC area • Monitor displacement of existing businesses in and around the OPDC area as a result of increases in land values and remedy adverse economic and employment consequences.

	<p><u>Issues</u></p> <p>Evidence base -</p> <ul style="list-style-type: none"> (i) Talks of providing some light industrial floor space in the Old Oak development (under recommendations) – but is contradicted by the ‘spatial scenario which states ‘all sites to be redeveloped as non-industrial’ (p6) (ii) In respect of Park Royal, the complexity of the land use is mentioned but rather ‘swept under the carpet’. The presence of manufacturing and the food and drink sector is not adequately revealed and does not address the hybridity of uses (industrial / office) as revealed in the London Office Policy Review of 2012. (iii) On supply and demand - projected changes in manufacturing job numbers (reproduced from GLA data) suggests that because of the ‘large stock of manufacturing jobs in the three boroughs, some of the loss of industrial land was justified’ (p40). This is however flawed since manufacturing accounts for less than a third of jobs on industrial land. It does not reflect the diversity of the uses occupying the industrial land nor acknowledge the spectrum of demand for such land, especially into the future. The latest GLA industrial land study has not been taken into consideration. The study should go much further in terms of providing local evidence from the boroughs to provide a more realistic picture of likely loss. (iv) The study fails to analyse the scale of intensification that much be accommodated in Park Royal. Only sites near public transport will likely have capacity to intensify (due to pressures on parking and congestion). Vacancy rates only 20%. Tensions around 300 businesses and 6,000 jobs affected by redevelopment in Old Oak / HS2. <p><u>Policy</u></p> <ul style="list-style-type: none"> (v) Loss of traditional industry in Old Oak for housing development (vi) establishing Old Oak as a recognised commercial hub (presumably similar to that at Canary Wharf). Is this realistic or desirable? Is there demand for prime office location on W London? (vii) The boroughs were proposing a buffer zone to protect the Park Royal SIL. Is this a good idea?
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	<ul style="list-style-type: none"> • If it is not possible to intensify Park Royal the number of suggested jobs is a complete pipe dream • They have to produce more jobs to accommodate the losses from Old Oak. Are there any policies to help with the businesses that are going to close down?
<p>E2: Old Oak <u>Preferred Policy Option</u> Old Oak will become a mixed employment hub by requiring proposals to provide:</p> <p>a) a new commercial area and a range of flexible open workspace typologies in locations identified in the Overarching Spatial Policies and Places Chapters; and</p> <p>b) town centre uses which generate employment along the High Street, in and around Old Oak Common Station and in other accessible locations.</p> <p><u>Alternative policy option</u></p> <p>1. Support for focusing B1(a) uses in and around Old Oak Common Station is not provided. 8.18 The benefit of this approach would be the provision of a more flexible approach to office distribution across Old Oak. The disadvantage would be that the commercial centre around Old Oak Common Station could become less defined leading to the location of office space in less accessible locations.</p> <p>2. Support for B1(b) and B1(c) uses in Old Oak north is not provided. 8.19 The benefit of this approach would be that additional floorspace is provided for non-industrial uses. The disadvantage would be that locations not suited to retail, office, leisure or residential uses could remain vacant and negatively impact on the amenity of the public realm.</p>	<p>Comment – What is the evidence that there is a demand from occupiers and workspace providers in this location? Is this a case of provide the space and hope the occupiers will flock here?</p> <p>Are there alternatives?</p>
<p>E3: Park Royal <u>Preferred Policy Option</u> Park Royal Strategic Industrial Locations (SIL) will be retained and where possible enhanced by:</p>	<p>Comments made in previous discussions -</p> <p>Concerns that -</p> <ul style="list-style-type: none"> • It is not clear if Park Royal will be able to accommodate the jobs that

<p>a) protecting existing SIL;</p> <p>b) requiring proposals for uses adjacent to SIL to robustly demonstrate how the use and design will continue to facilitate the integrity and effectiveness of industrial activities within SIL;</p> <p>c) designating the following sites as new SIL:</p> <p>i. Matthew Park (B6.29);</p> <p>ii. Central Park (B6.31);</p> <p>iii. Corner of Acton Lane and Park Royal Road (E2.05b);</p> <p>iv. Vacant land on Western Road (E3.19); and</p> <p>v. The Courtyard Estate (E4.26).</p> <p>d) intensifying the use of land by requiring proposals to demonstrate how they are maximising the use of sites, including the provision of smaller units, to support greater employment densities; and</p> <p>e) supporting appropriate town centre uses in the Park Royal Centre outside of SIL.</p> <p><u>Alternative policy option</u></p> <p>1. SIL boundary is not extended.</p> <p>8.33 The benefit of this approach would be sites could deliver non-industrial uses which support the functioning of SIL. However, not designating sites considered to be appropriate for SIL could be considered as a lost opportunity to help support the continued success of Park Royal.</p> <p>2. Additional land in Park Royal is released, such as the High Speed 2 construction work sites north and south of the canal, to accommodate other forms of development. 8.34 The benefit of this approach would be that additional development capacity is delivered. The disadvantage is that further pressure on industrial land capacity is created and it would threaten the future success of Park Royal.</p>	<p>are going to be lost from Old Oak</p> <ul style="list-style-type: none"> Accommodation of displaced businesses from Old Oak to Park Royal should take into consideration the impact of disruption to the existing businesses. <p>Proposals that</p> <ul style="list-style-type: none"> The kinds of services and businesses in Park Royal provide essential services to London and their displacement through regeneration by higher-end, more intensive, office-type jobs would be unwise The OPDC should look at the potential spin off from existing and new and academic centres, including Central Middlesex hospital – for example - advanced manufacturing, medical research, robotics and potentially production of automatic cars. Build on existing and emerging successful business with clear links to and integration with the Park Royal SIL and to neighbouring opportunities. Sustain and enhance existing valued services (including hospitals and existing retail shops). Relocate waste sites to Park Royal <p><i>Should there be some further detail on what 'protecting' this important Strategic Industrial Location might mean?</i></p>
<p>E4: Open workspace</p> <p>Preferred Policy Option</p> <p>Proposals for open workspace typologies will be supported by:</p> <p>a) protecting and/or enhancing existing viable open workspace typologies where they make maximum use of their site and contribute to the wider regeneration of the OPDC area;</p> <p>b) requiring proposals for major commercial development to deliver affordable workspace;</p> <p>c) supporting proposals for open workspaces typologies where they are</p>	<p>Comment</p> <ul style="list-style-type: none"> It is essential that existing communities inside and on the edges of the OPDC area are able to benefit from new employment rather than the residual or low end jobs such as cleaning and security jobs. There is lack of vision regarding types of jobs and all local authorities have big problems in attracting open space providers. <p>Question/Challenge:</p>

<p>demonstrated to be:</p> <ul style="list-style-type: none"> i. appropriately located and designed; ii. viable for nurturing and stimulating entrepreneurial activity, in particular in future growth sectors; iii. informed by the business needs of open workspace providers and the requirements of relevant small business sectors; iv. appropriately managed by a registered workspace provider, or supported by a Management Scheme, and agreed through Section 106 agreements; and v. not resulting in a net loss of employment land or floorspace; <p>d) exploring mechanisms to deliver open workspaces in accordance with OPDC regeneration priorities.</p> <p>Proposals for temporary employment floorspace will be encouraged where it:</p> <ul style="list-style-type: none"> e) contributes to the vitality, character and activation of an area; f) contributes to establishing and/or growing business sector clusters that make a positive contribution to the economic and social regeneration of the area; g) provides open workspace typologies; and h) demonstrates how it would complement the longer term comprehensive regeneration of the area. <p><u>Alternative policy options</u></p> <p>1. Delivery of onsite open workspace is required for residential and/or commercial proposals. 8.45 To help further ensure that open workspace typologies for small, medium and micro enterprises, this option would require all proposals for residential and/ or employment proposals to deliver onsite open workspace. The advantage of this option would be to provide a large quantum and range of employment workspace and support a diverse local economy. The disadvantage would be that low quality spaces may be produced and would be burdensome for smaller developments. Provision of such spaces without an appropriate market needs assessment may result in high vacancy rates which may have a negative impact on placemaking and perceptions of community safety.</p> <p>2. Delivery of small-scale workspaces is supported with coordinated delivery of rented small-scale residential units outside of the SIL. 8.46 To support the delivery and operation of small-scale workspaces, these spaces could be linked with the use of rented small-scale</p>	<p>Where is the evidence base to support this?</p> <p>What are the alternatives – what would be a better vision?</p>
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<p>residential units for occupiers within Old Oak. This would be secured through S106 agreements and other management arrangements. The advantage of this option would be that development would support start-up businesses to be established and would support the delivery of a range of housing typologies meeting potential need. The disadvantage would be the risk that if one of the employment or housing units is vacant, the related joined unit would also be vacant and increase overall vacancy rates.</p>	
<p>E5: Local access to employment and training Preferred Policy Option a) OPDC will maximise access to employment, skills training, apprenticeships and pre-employment support that responds to changing labour market conditions and employer demand by: i. promoting the benefits of responsible business by giving developers and employers information and tools to recruit a local talent pool and source local firms to fulfil their business needs; and ii. working with partners and relevant stakeholders to deliver a coordinated, demand-led training and employment offer and effective pathways for local people into sustainable jobs and higher paid work. b) Development proposals will be required to include a Local Employment and Training Agreement setting out how they will meet OPDC's socio-economic regeneration priorities.</p>	<p>Comment made previously</p> <ul style="list-style-type: none"> • The life chances of residents, particular those of relatively deprived areas in and around the OPDC area, are increased via the delivery of strong local economic activity and employment and support for an integrated approach to skills, training and apprenticeships through to longer-term skilled employment. • Provide local skills training, assessed via needs analysis of communities within and on the boundaries of the OPDC area, to ensure targets are met. <p><i>How will the policy be monitored?</i> <i>What specific projects and targets should be set?</i> <i>Should "local people" be defined?</i></p>

ENVIRONMENT AND UTILITIES

EU1: Strategic policy for the environment and Utilities

OPDC will support proposals that:

- a)** Promote environmentally sustainable development that utilises the highest standards of design, delivery and operation;
- b)** Deliver best practice in utilising innovation and the application of emerging technologies;
- c)** Maximise their contribution to a healthy and safe environment for people and for nature;
- d)** Increases the area's resilience to the effects of a changing climate and minimises carbon emissions;
- e)** Contribute to the achievement of environmental standards set by OPDC (see Table 13); and
- f)** Support delivery of coordinated and area-wide utilities infrastructure.

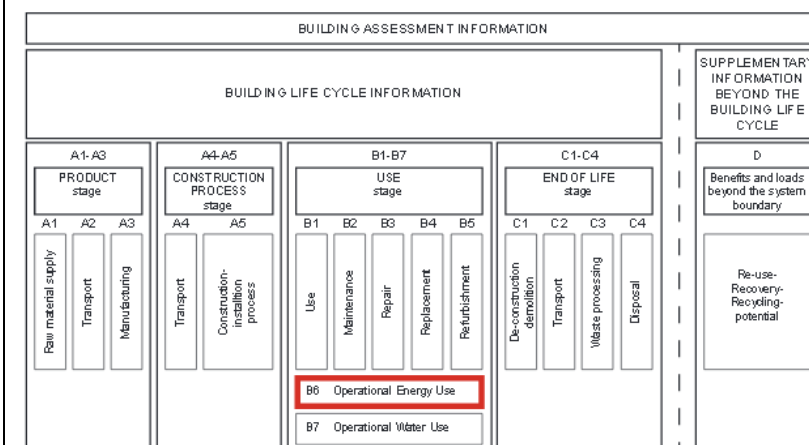
Table 13: Environmental sustainability targets for development in the OPDC area

Topic Area	Current targets in London Plan / Mayoral Strategies
Reduce greenhouse gas emissions	<ul style="list-style-type: none"> Reduce CO₂ emissions by 60 per cent from 1990 levels by 2025, and 80% by 2050 All new homes to be zero carbon by 2020 Reduce London's waste management to save one megatonne of CO₂ equivalent per year by 2031 Application of the Energy (and cooling) Hierarchy in the London Plan.
Local energy supply	<ul style="list-style-type: none"> Supply 25 per cent of London's energy locally, including the use of decentralised energy networks.
Waste reduction and recycling	<ul style="list-style-type: none"> Work towards zero biodegradable/recyclable waste to landfill by 2026. 90% reuse re-cycling/re-purposing of construction materials. Recycling 70% of commercial/industrial waste by 2020. Recycling of 50% of municipal waste by 2020, and 60% by 2031. 1% reduction in municipal waste per capita per annum.
Green infrastructure	<ul style="list-style-type: none"> increase tree coverage by at least 25 to 30%. All major buildings to include a green, solar or cool roof and a minimum of 50% of the built environment footprint to include urban greening measures. Achieve net gains for nature.
Water management	<ul style="list-style-type: none"> Minimising use of mains water. Use SuDS to achieve run-off rate equivalent to a greenfield. Water efficiency of 105 litres per household per day to match higher requirements of Building Regulations.
Air quality	<ul style="list-style-type: none"> Meet EU values for air pollutants. Seek to achieve Air Quality Neutrality. Apply Ultra Low Emissions Zone standards to Non-Road Mobile Machinery as given in Mayoral SPG on The Control of Dust and Emissions.
Digital communications	<ul style="list-style-type: none"> To deliver a world-class network. Embed Smart solutions.
Circular economy	<ul style="list-style-type: none"> Support job creation linked to re-manufacturing, repair, reuse, and recycling. Consider the application of the GLA's Responsible Procurement Policy to the OPDC area.

Add

- to (d) 'including embodied carbon'
- to table 13 a section on embodied carbon and targets for reduction – to assist in meeting London Plan and EU targets. Some local authorities including Brighton and Hove require embodied carbon estimates.

Policy response only addresses operational energy use



Embodied carbon is significant

Estimated carbon footprint of UK construction supply chain

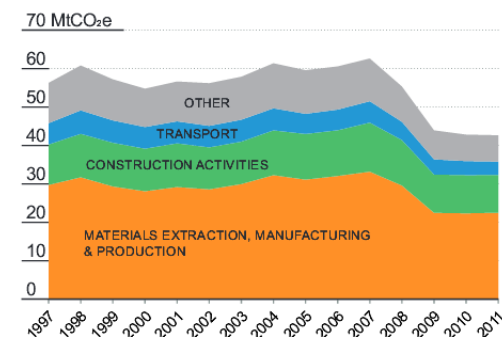


Figure from Giesekam et al. Energy and Buildings 78 pp202-214 (2014)

Slick

	<p>Both at local and international level</p> <ul style="list-style-type: none"> » 6 local authorities (e.g. Brighton & Hove County Council) require embodied carbon estimates » Requirements for embodied carbon assessment in the Netherlands and Germany (and will shortly be introduced in several other countries) » Embodied carbon likely to be an indicator in new EU harmonised sustainability assessment framework » Embodied Carbon Task Force currently lobbying for inclusion of embodied carbon abatement as an Allowable Solution
<p>EU2: Smart technology <u>Preferred Policy Option</u> a) OPDC will work with partners and stakeholders to position Old Oak and Park Royal as a world leading location for the exploration, exploitation and implementation of smart city technology, approaches and systems. b) OPDC will require proposals to provide interoperable open and usable data to inform OPDC activities and processes. <u>Alternative policy option</u> 1. That the provision of interoperable, open and usable data is not specifically required. The benefit to this approach would be that applicants are able to provide information in the format of their choice. The disadvantage is that this would inhibit OPDC in creating an open digital environment to inform the development management process and wider activities.</p>	
<p>EU3: Water Development proposals will be required to: a) demonstrate a collaborative approach to working with OPDC and its development partners to implement and manage area-wide water infrastructure options identified in the Integrated Water Management Study (IWMS) that address surface and waste-water disposal capacity issues and sustainable management of water supply and that connect or contribute towards a local rain/grey/storm water management system; b) minimise water consumption by seeking to get as close to neutrality in water use and consumption as possible and achieve the water management standards that will be set through this Local Plan; c) use sustainable drainage techniques to achieve at least 'greenfield' rates of surface</p>	<ul style="list-style-type: none"> • Issues of flash flooding?

<p>water run-off;</p> <p>d) implement the flood risk management measures identified in the relevant borough's Surface Water Management Plans and protect existing flood management assets;</p> <p>e) due to the limited capacity of the combined sewer serving the Counters Creek catchment, demonstrate that the scheme would result in the release of network capacity, or includes the provision of capacity improvements sufficient to meet its needs without adversely impacting on existing development, or compromising the ability of other developers to meet the future needs of development planned for in the Local Plan;</p> <p>f) in the Park Royal area, support the actions identified in the Thames River Basin Management Plan for the River Brent; and</p> <p>g) include measures to protect and improve the water environment, water quality and ecological value of the Grand Union Canal and other watercourses.</p>	
<p>EU4: Waste management</p> <p>a) continue to safeguard existing waste and recycling sites in Park Royal in accordance with the West London Waste Plan;</p> <p>b) safeguard the Powerday (Old Oak Sidings) waste site in Old Oak;</p> <p>c) work with other waste operators in Old Oak to coordinate their relocation to other suitable and accessible sites; and</p> <p>d) ensure that proposals for waste facilities adequately mitigate their impact on amenity, air quality, noise and other relevant environmental considerations.</p>	<ul style="list-style-type: none"> • Relocate waste sites to Park Royal. • Fully integrate environmental infrastructure (including facilities for minimisation of waste and the maximisation of recycling) within housing developments • Encourage standardisation and co-ordination of procedures around waste and recycling to prevent confusion and duplication especially where developments cross borough boundaries • Encourage standardisation and co-ordination of procedures around waste and recycling to prevent confusion and duplication especially where developments cross borough boundaries • Clearly specify the way in which energy will be extracted from waste. Energy from Waste (EfW) Incineration would be contrary to securing sustainable environmental standards. There are alternative, much more environmentally friendly ways and technologies to achieving local energy production and distribution
<p>EU5: Circular economy and resource efficiency Preferred Policy Option</p>	

<p>Development proposals, in promoting a circular economy, will be required to:</p> <ul style="list-style-type: none"> a) demonstrate how they have as far as possible designed out waste and ensured the efficient use of building materials through: <ul style="list-style-type: none"> i. lean design, minimising the use of primary materials and the production of excess or waste material during construction; ii. maximising the use of secondary materials and the opportunities for reuse, remanufacture or recycling of materials; and iii. considering the end-of-operational life use of materials, or if not viable, on-site energy recovery from waste; b) make adequate provision for convenient domestic and commercial waste storage and for collection within the development that allows for a range of future collection options; c) investigate the potential for the movement of waste and recyclable materials during construction by sustainable means of transport, including by rail, and the Grand Union Canal; and d) promote other on-site waste management and communal composting. <p><u>Alternative policy option</u></p> <p>1. Safeguard all waste sites in Old Oak.</p> <p>12.56 This approach would ensure that borough apportionment targets are exceeded, but would prevent development from being brought forward within the 'Old Oak North' place and would undermine the delivery of homes and jobs in the OPDC area.</p>	
<p>EU6: Decentralised energy</p> <p><u>Preferred Policy Option</u></p> <p>OPDC will support and facilitate:</p> <ul style="list-style-type: none"> a) provision of energy supply infrastructure that enables development (electricity and gas); b) the provision of infrastructure to deliver a decentralised energy network; c) proposals which contribute to the delivery of a decentralised energy network subject to: <ul style="list-style-type: none"> i. providing evidence that appropriate management mechanisms will be put in place to ensure that end customers are protected in respect of the price of energy provided; and ii. ensuring that heat losses from the network are minimised. <p>Development proposals will be required to:</p> <ul style="list-style-type: none"> d) demonstrate a collaborative approach to working with OPDC and its development 	<p><u>Comments</u></p> <ul style="list-style-type: none"> • The size of an Energy Centre is large and no information has been provided in the policy or evidence base documents around where this might be located. • Analysis of the size and potential levels of nuisance and disturbance from the Centre need to be provided. • There is one company – so residents have not options in terms of providers. • Costs could be negative to households in fuel poverty. • There is a need for an optimum number to be linked in to see the value (for money). • All the blocks at N Acton use electricity not gas for heating – this is a missed opportunity. • If the OPDC area is going to high levels of insulation that will

<p>partners to contribute to the supply and capacity of the decentralised energy network unless it can be demonstrated that this is not technically feasible or economically viable;</p> <p>e) be designed to enable connection to the decentralised energy network, where there is no connection to a decentralised energy network yet available, and/or where CCHP or CHP would not be technically feasible or financially viable;</p> <p>f) demonstrate that provision is included to accommodate routes and land for energy centres and utilities networks; and</p> <p>g) submit an Energy Statement.</p> <p><u>Alternative policy option</u></p> <p>1. To delete the policy reference to 'major' development, so that the policy requirements apply to 'all' development.</p> <p>12.66 This would put the onus on all developments to contribute to the decentralised energy network. This option would deliver greater sustainability but could be difficult and costly to deliver, creating greater uncertainty of delivery and impact on the viability of smaller schemes.</p>	<p>reduce need for heating – but hot water supply for washing, showers and baths are a considerable load and need to be factored in.</p> <ul style="list-style-type: none"> • Efficient use of CHP or CCHP requires 24hrs mixed-use load demands via a mixed use development site. Evidence on this is needed. • Decentralised energy is good for mixed users – hospitals, hotels. Can all this be achieved? • There would be a need for wayleave agreement when it comes to some getting linked into the heat and power network (E.g. Wells House Road and Midland Terrace). • Since overheating (as a result of the heat island effect) is increasingly a problem in the summer is there also potential to provide cooling systems (CCHP). • No other renewable technologies are mentioned (battery storage or Solar PV).
<p>EU7: Digital communications</p> <p><u>Preferred Policy Option</u></p> <p>a) OPDC will work with partners and infrastructure providers to deliver exemplar digital communications infrastructure by:</p> <ul style="list-style-type: none"> i. promoting the delivery of digital communications infrastructure; ii. exploring innovative delivery and management models; and iii. integrating contemporary technology and seeking to accommodate future technologies to address challenges and create opportunities. <p>b) Development proposals will be required to demonstrate how they will support and integrate the delivery of technology and communication infrastructure.</p> <p><u>Alternative policy option</u></p> <p>1. OPDC does not specifically seek to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities.</p> <p>12.76 The benefit of this approach would be that existing technologies and systems are implemented at less risk to stakeholders. The disadvantage would be that existing challenges aren't addressed and new opportunities aren't created or captured.</p>	
<p>EU8: Green infrastructure & biodiversity</p> <p>Development will be required to:</p> <p>a) protect and/or enhance and create multi-functional green and water spaces and ensure they are connected by street greening and</p>	<p><u>Add</u></p> <ul style="list-style-type: none"> • 'existing' after 'enhance' in (a) • Protection of trees • Provide green roofs and walls and green public spaces

<p>other green links;</p> <p>b) demonstrate how green infrastructure has been:</p> <p>i. integrated with utilities infrastructure; and</p> <p>ii. planned, designed and managed to contribute to and be integrated with, the wider green infrastructure network;</p> <p>c) take account of the proximity of SINC, and the habitat and species targets in relevant Biodiversity Action Plans (BAPs);</p> <p>d) be accompanied by an Ecological Statement for major applications;</p> <p>e) have particular regard to the measures for the protection and enhancement of ecology and biodiversity in Wormwood Scrubs and for the Grand Union Canal.</p>	<p>that will absorb water, rather than using concrete / hard surface materials and will reduce air pollutant concentrations</p> <ul style="list-style-type: none"> • Set back development from the edge of the canal, to ensure it is accessible to everyone and to ensure there is a thriving continuous wildlife corridor. • Set acceptable height of development at no more than two or three storeys adjacent to the canal. • Provide segregated cycling and pedestrian routes on the canal tow path. • Encourage new basins, side docks and wharfs along the canal in order that development may occur in cul-de-sacs away from the edge of the canal. • Ensure that where possible bridges over the canal are light and pedestrian only. • The OPDC will work with the three boroughs in respect of impact of development on need for additional green corridors and spaces and biodiversity provision at the edges of the OPDC area. • OPDC policy or guidance required on trees; types that should be used and support in terms of London's heat island effect, CO2 emissions and pollution. • Food growing. • Include encouragement of green spaces in Park Royal • Access for people from Harlesden into the green spaces.
<p>EU9: Extraction of minerals</p> <p>Applications for mineral extraction, including the exploration, appraisal and operation of unconventional oil and gas resources, will be considered against the following criteria:</p> <p>a) Protection of nearby residents and businesses from the effects of the operations, particularly in regard to air quality and noise;</p> <p>b) The operation's design, including its sensitivity to the character of the urban landscape and to features of national, London, and local</p>	

<p>importance;</p> <p>c) Site access, traffic generation and the routing of heavy vehicles;</p> <p>d) Safeguarding of water supplies and the water environment, the safe and sustainable disposal of waste water and flood risk management including surface water;</p> <p>e) The effects on public rights of way, open spaces or outdoor recreation;</p> <p>f) The control and mitigation of greenhouse gas emissions and dust during construction and operation;</p> <p>g) The efficient use of resources (such as construction materials or water);</p> <p>h) The contribution of the operation to the development of heat and energy recovery or low carbon technologies;</p> <p>i) Site restoration, and effective after-use following development; and</p> <p>j) the safeguarding of biodiversity and sites of interest for nature conservation.</p>	
<p>EU10: Air Quality</p> <p>Development will be required to demonstrate through an air quality assessment how it:</p> <p>a) implements the recommendations of the Old Oak and Park Royal Air Quality Study (summarised in Table 15 below);</p> <p>b) has regard to the relevant borough's Air Quality Management Plans and the mitigation measures identified therein;</p> <p>c) considers air quality impacts during construction and operation with the aim of being air quality neutral, with mechanisms for how this will be monitored over time;</p> <p>d) seeks to minimise air quality impacts from surrounding uses.</p>	<p><u>Add:</u></p> <ul style="list-style-type: none"> • Rigorously monitor (with the boroughs) processes and responses to any detrimental impact of existing and any increased levels of air pollution. • Need to monitor processes that will be used including health impacts and response systems. • Use of filter stations; the planting of trees, shrubs and other plants; and other interventions that are effective in absorbing pollution should specifically be encouraged. • The OPDC should establish good relationships with active canal freight companies particularly relating to the potential for use of the canal in respect of transportation of building materials over the next 20 years or more as a means of minimising levels of dust and pollution through the use of trucks. <p>(are any of these already included in the Summary of Air Quality Study?)</p>

Table 15: Summary of the draft Air Quality Study (AQS) recommendations		
Policy Area	Policy action / mitigation measure	
Transport	<ul style="list-style-type: none"> ■ Minimise demand for travel by private motor vehicles and encourage transport by shared, low and zero emission modes. ■ Provide no more than 1 car parking space per 5 residential units and ensure sufficient provision of electric charging points. ■ Encourage the uptake of Low and Zero Emission Vehicles by providing vehicle re-fuelling / charging infrastructure. ■ Design local roads to restrict vehicle speeds to 20mph. 	
Energy	<ul style="list-style-type: none"> ■ CHP / biomass should meet the highest emissions standards detailed in the Mayor of London's Supplementary Planning Guidance (SPG) on Sustainable Design and Construction. ■ Development design should be optimised to ensure adequate dispersion of emissions from discharging stacks and vents. 	
Waste	<ul style="list-style-type: none"> ■ All new waste treatment and handling facilities will require to be fully enclosed. 	
Overall Emissions	<ul style="list-style-type: none"> ■ Designate a Low Emissions Neighbourhood for the OPDC area. ■ Establish a Class C Clean Air Zone to encourage the use of low emissions vehicles. ■ Minimise air pollution making new developments 'air quality neutral' in accordance with the Mayor SPG on Sustainable Design and Construction. ■ Proposals should not increase the area of exceedance of EU established health-based standards and objectives for NO2 and PM10. Where new developments are introduced into area where the standards and objectives are exceeded, developments should be designed to minimise and mitigate against increased exposure to poor air quality. ■ Developers should produce an air quality assessment with the planning application. The AQS provides further recommendations on matters for inclusion within the air quality assessment. 	
Monitoring	<ul style="list-style-type: none"> ■ Support the installation of new automatic monitors for NO2 and PM10 on the main A-roads in the area (see figure 137) 	
Design / Public Realm	<ul style="list-style-type: none"> ■ Development and building design should not inhibit the effective dispersion of pollution. In particular, bus and taxi facilities should be designed to avoid the build-up of pollution. ■ Developments should provide adequate, appropriate and well located green space and infrastructure. 	
Construction and logistics	<ul style="list-style-type: none"> ■ Minimise emissions from freight, delivery and servicing during the demolition and construction phase. ■ Follow the guidance set out in the Mayor's SPG on 'The Control of Dust and Emissions during Construction and Demolition' to assess the impact on air quality during construction and to inform mitigation. ■ Localised AQ measures to tackle known issues in the OPDC area, particularly those associated with high NO2 within the GLA's Air Quality 'Focus Areas' (see Figure 135). ■ Renewable, mains or battery powered plant items should be used for Non-Road Mobile Machinery (NRMM) on construction sites. ■ All demolition and construction sites should be monitored for the generation of air pollution. PM10 monitoring should be carried out at medium and high risk sites. 	
EU11: Noise Preferred Policy Option Development proposals should submit a noise assessment that demonstrates: a) how design has minimised adverse noise impacts from both surrounding and internal uses on future occupants. In high density development noise attenuation measures will be of particular importance; and b) where development is proposed close to existing noise generators such as waste sites, cultural facilities, strategic roads or uses within Strategic Industrial Locations (SIL), how it will ensure the continued effective		Add ' and vibration ' to the policy name. <u>Comment</u> <ul style="list-style-type: none"> • This is particularly important during the construction phases. A section particularly on construction phases is needed to cover a range of issues such as this which will be of a different nature during these phases.

operation of those uses.	
<p>EU12: Land contamination Preferred Policy Option OPDC will:</p> <ul style="list-style-type: none"> a) assess development proposals in relation to the suitability of the proposed use for the conditions on that site; b) require applications for new development to be supported by: <ul style="list-style-type: none"> i. a site investigation; ii. an assessment to establish the nature, extent, and risk presented by contamination; and iii. remediation proposals, to be agreed before planning permission is granted; c) expect, as a preferred approach, the treatment of contamination to take place on-site; and d) require developers to complete the implementation of agreed measures to assess and abate any risks to human health or the wider environment, prior to the first occupation and use of the development, or as otherwise agreed by planning conditions. e) Require development proposals to set out practicable and effective measures to manage the risks from contamination and decontamination by treating, containing or controlling any contamination so as not to: <ul style="list-style-type: none"> i. expose the occupiers of the development and neighbouring land uses including, in the case of housing, the users of open spaces and gardens to an unacceptable risk; ii. threaten the structural integrity of any building built, or to be built, on or adjoining the site; iii. lead to the contamination of any watercourse, water body or aquifer; or iv. cause the contamination of adjoining land or allow such Contamination to continue. 	<p><u>Comment</u></p> <ul style="list-style-type: none"> • Assessment of individual sites is required as part of the evidence base for this policy. The current documentation is very general. • Will the ultimately responsibility for this lie with the OPDC or boroughs?

- A separate section is needed on dealing with all issues during the construction phase – to include embodied carbon emissions, extraction of minerals, air pollution, noise and vibration,
- Include or add policies on light pollution, heat island effect, sustainability / lifetimes of buildings
- Food recycling should be encouraged – will there be an anaerobic digester in the OPDC area?
-

HOUSING	
<p>H1: Strategic policy for housing OPDC will work to ensure the area plays a crucial role in delivering a range of high quality housing that addresses London's housing requirements. This will be achieved through encouraging:</p> <ul style="list-style-type: none"> a. the delivery of new housing, where it accords with other policies in this Local Plan; b. a mix of housing types and tenures to meet a wide variety of needs; and c. developments to be flexible and adaptable to accommodate future need, innovation and smart technologies. 	<p><u>Change to</u></p> <ul style="list-style-type: none"> • OPDC will work to ensure the area plays a crucial role in delivering a range of housing that will: assist in creating Lifetime Neighbourhoods, address the housing requirements of the three boroughs of the OPDC area and helps in addressing need London's wide. • add to (a) and protecting existing homes of established communities in the OPDC area • add to (b) a wide variety of 'objectively assessed' needs and which deliver a range of long-term secure tenures that meet a variety of needs and
<p>H2: Housing supply <u>Preferred Policy Option</u> OPDC will support delivery of new homes during the Plan period (2017-2037). This new housing will be achieved through:</p> <ul style="list-style-type: none"> a. Setting an annual housing target; b. Promoting the development of sites identified within the Development Capacity Study (DCS); c. Promoting development opportunities on windfall sites, where these accord with other Local Plan policies; d. Working with the London Boroughs of Brent, Ealing and Hammersmith and Fulham to bring vacant dwellings back into use; e. Supporting housing conversions and changes of use to residential where this accords with other Local Plan policies; and f. Monitoring delivery and publishing information on the rate of housing starts and completions and the trajectory of deliverable and developable housing supply. <p><u>Alternative policy option</u> 1. Seek to deliver a higher number of new homes within the Local Plan period. 7.20 This option is unlikely to be achievable as there are significant infrastructure and delivery issues that would need to be overcome to free up all sites for development within the plan period. Further information on site availability is set out in the DCS.</p>	<p><u>Comments</u></p> <ul style="list-style-type: none"> • It is very hard to see how objectively assessed need will be delivered unless the funding gap for infrastructure is addressed. • There are concerns that the DIFS unreasonably seems to promote just 20% affordable housing being delivered (only half the London Plan target) as a method of reducing the funding gap, particularly when the SHMA identifies such high needs for affordable housing • <i>Is there is a need to consider different options around delivering homes (particularly affordable) in the OPDC area, which the DIFS currently fails to do.</i> • <i>In March 2016 the former transport minister Steven Norris claimed in Transport Xtra that the Government's proposed Old Oak development built around the HS2 and Crossrail station 'is a con-trick that will fail to deliver the promised homes and jobs'.</i> • <i>It is not clear that the area will attract high density residential development in the near future– given that this is a new location that will be a building site for 30-40 years and in addition the international residential investment market is falling off quite quickly – 5%-10% over the last 6-12 months and a 20% over the last year or more.</i> • <i>The strategy for delivering homes needs to be more carefully considered especially since land owners (DfT and Network Rail) will unlikely sell land cheap for affordable housing.</i> • <i>What if delivery is poor and if objectively assessed need is not</i>

<p>limited budgets who wanted to live close to central London. However, such small unit sizes could negatively impact on the health and well being of the individual(s).</p>					
<p>H4: Affordable housing</p>	<p><u>Comments made previously</u></p>				
<p>OPTION 1 - FIXING THE PERCENTAGE</p> <p>7.39 A single OPDC wide figure is fixed for the level of affordable housing. The Mayor's draft Housing SPG supports this approach in Opportunity Areas. This fixed rate would be subject to a regular review of viability by OPDC and this figure would need to be amended 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. Comments are invited on whether or not this option should have a review mechanism (please see questions below). The table below sets out the strengths and weaknesses of this option.</p> <table border="1"> <thead> <tr> <th>Strengths</th><th>Weaknesses</th></tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> ■ Helps provide certainty to developers and land owners about the affordable housing requirements and helps prevent land price rises based on hope value. ■ Gives a single definite target and delivers policy compliant levels of affordable housing over the life of a large scheme. ■ Easy to define any external subsidy required to deliver this policy requirement. ■ Clear definition of obligations where land is sold. ■ No need to negotiate on commuted sums as part of negotiations ■ Reduces lengthy and costly negotiations with applicants as there would be no need for any detailed viability assessments. </td><td> <ul style="list-style-type: none"> ■ The fixed affordable housing level is dependent on the quality of OPDC initial viability work – including estimated costs for abnormals and infrastructure. ■ May require a high density to meet identified housing needs. ■ Little flexibility to respond to rapid changes in market conditions. ■ Could end up with less affordable housing if market performs strongly and if there is no review mechanism. ■ Not an approach that has been tried or tested anywhere before. ■ The fixed percentage may have to be set at a low rate due to initial viability. ■ Would require robust and regular viability analysis by OPDC to ensure conformity with national and regional policies. </td></tr> </tbody> </table>	Strengths	Weaknesses	<ul style="list-style-type: none"> ■ Helps provide certainty to developers and land owners about the affordable housing requirements and helps prevent land price rises based on hope value. ■ Gives a single definite target and delivers policy compliant levels of affordable housing over the life of a large scheme. ■ Easy to define any external subsidy required to deliver this policy requirement. ■ Clear definition of obligations where land is sold. ■ No need to negotiate on commuted sums as part of negotiations ■ Reduces lengthy and costly negotiations with applicants as there would be no need for any detailed viability assessments. 	<ul style="list-style-type: none"> ■ The fixed affordable housing level is dependent on the quality of OPDC initial viability work – including estimated costs for abnormals and infrastructure. ■ May require a high density to meet identified housing needs. ■ Little flexibility to respond to rapid changes in market conditions. ■ Could end up with less affordable housing if market performs strongly and if there is no review mechanism. ■ Not an approach that has been tried or tested anywhere before. ■ The fixed percentage may have to be set at a low rate due to initial viability. ■ Would require robust and regular viability analysis by OPDC to ensure conformity with national and regional policies. 	<ul style="list-style-type: none"> • The OPDC should operate an open an book policy relating to relating to any pre-application advice provided to developers, and public bodies [i.e. Network Rail / TFL] and on negotiations around viability of schemes (particularly regarding affordable housing proposals and section 106 agreements); • Opportunities of new social renting on existing public land should be considered. • Social housing should be indistinguishable from other tenures. <p><u>Some questions</u></p> <ul style="list-style-type: none"> • <i>Why hasn't the OPDC carried out a study to assess what percentages of affordable housing might be viable?</i> • <i>How will objectively assessed need be delivered if the majority of 'affordable homes are starter homes?</i> • <i>What's the plan B?</i> • <i>Insufficient information is provided for people to make a genuinely informed decision on the four options.</i> <p>There are a number of people / organisations who think the fixed level option is a good idea – especially if developers are told straight up this is what is expect. (IPPR's Housing Commission for example) The OPDC would have to provide evidence that this is a viable option.</p>
Strengths	Weaknesses				
<ul style="list-style-type: none"> ■ Helps provide certainty to developers and land owners about the affordable housing requirements and helps prevent land price rises based on hope value. ■ Gives a single definite target and delivers policy compliant levels of affordable housing over the life of a large scheme. ■ Easy to define any external subsidy required to deliver this policy requirement. ■ Clear definition of obligations where land is sold. ■ No need to negotiate on commuted sums as part of negotiations ■ Reduces lengthy and costly negotiations with applicants as there would be no need for any detailed viability assessments. 	<ul style="list-style-type: none"> ■ The fixed affordable housing level is dependent on the quality of OPDC initial viability work – including estimated costs for abnormals and infrastructure. ■ May require a high density to meet identified housing needs. ■ Little flexibility to respond to rapid changes in market conditions. ■ Could end up with less affordable housing if market performs strongly and if there is no review mechanism. ■ Not an approach that has been tried or tested anywhere before. ■ The fixed percentage may have to be set at a low rate due to initial viability. ■ Would require robust and regular viability analysis by OPDC to ensure conformity with national and regional policies. 				
	<ul style="list-style-type: none"> • <i>Should the policy specify what the OPDC feels is an acceptable profit margin for developers?</i> • <i>Should a percentage target of social/affordable and intermediate housing be set in this policy (as is set in the London Plan)?</i> 				

OPTION 2 – PRODUCT DEPENDENT RANGE

7.40 A percentage range is set for each product type, recognising that some affordable housing products are more costly to deliver than others or are more suited to different types of developments. The table below sets out the strengths and weaknesses of this option.

Strengths	Weaknesses
<ul style="list-style-type: none">■ Innovative.■ Clear minimum/maximum range for negotiations.■ Move away from a hard target.■ Flexible enough to reflect different development types, site economics or local priorities.	<ul style="list-style-type: none">■ Complex to negotiate and monitor.■ May not provide a mixed and balanced sustainable community as it could promote developments providing only one affordable tenure type.

OPTION 3 – VIABILITY TESTED PERCENTAGE

7.41 This is the approach currently favoured by local planning authorities. A percentage target 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. The table below sets out the benefits and disbenefits of this option.

Strengths	Weaknesses
<ul style="list-style-type: none">■ Approach currently adopted by local planning authorities.■ This option has a proven track record of being accepted by Secretary of State.■ Transparency – reliance on published and verifiable data through developers' viability assessments.■ Responsive to market conditions – but also to needs as tenure and product types could flex.■ Responsive to site-specific conditions.	<ul style="list-style-type: none">■ Does not control land price rises in the same way as Option 1.■ Could result in the level of affordable housing secured being below the policy target.■ Time consuming and will require costly and protracted negotiations.■ No incentive for developers/ applicants to exceed set target.■ Can have sites where no or little affordable housing is viable.

This option (3) is often favoured by boroughs since they set a target that seems to be OK – but give in when it comes to individual sites where the developers say the target is not viable.

<p>OPTION 4 – NEGOTIATE A TARGET ON SITE-SPECIFIC BASIS</p> <p>7.42 This seeks the maximum reasonable amount of affordable housing without specifying a percentage target for each development to achieve. A review of relevant economic data at the outset will enable an allocation of affordable housing on the site to be determined.</p> <table border="1"> <thead> <tr> <th>Strengths</th><th>Weaknesses</th></tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> ■ No upper thresholds and could secure high levels of affordable housing on certain sites beyond the levels in the London Plan. ■ Is a site specific approach. ■ A strong audit trail. ■ Does not require upfront or comprehensive viability analysis. </td><td> <ul style="list-style-type: none"> ■ Does not provide certainty on the level of affordable housing that will be secured through a development. ■ Will not be in compliance with the London Plan or NPPF. ■ Is not aspirational. ■ Requires long and costly negotiations on each site. ■ Relies on verifiable data. </td></tr> </tbody> </table>	Strengths	Weaknesses	<ul style="list-style-type: none"> ■ No upper thresholds and could secure high levels of affordable housing on certain sites beyond the levels in the London Plan. ■ Is a site specific approach. ■ A strong audit trail. ■ Does not require upfront or comprehensive viability analysis. 	<ul style="list-style-type: none"> ■ Does not provide certainty on the level of affordable housing that will be secured through a development. ■ Will not be in compliance with the London Plan or NPPF. ■ Is not aspirational. ■ Requires long and costly negotiations on each site. ■ Relies on verifiable data. 	
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<p>H5: Existing housing <u>Preferred Policy Option</u> OPDC will seek to optimise the use of existing the housing stock and land through:</p> <p>a. Resisting the net loss of existing housing units or floorspace through change of use or redevelopment, except in areas of Strategic Industrial Location (SIL) or where it is being reprovided at a higher density;</p> <p>b. Work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham and other stakeholders to bring vacant residential properties back into use (including where appropriate the use of empty dwelling management orders or compulsory purchase powers);</p> <p>c. Permit conversions of existing dwellings to two or more dwellings where:</p> <p>i. at least one family sized unit (3 bed+) is provided through each conversion with access to amenity space;</p> <p>ii. residential conversions maintain the amenity of neighbours, the general character of the surrounding area and do not result in cumulative stress on services; and</p>	<p><u>Insert</u></p> <ul style="list-style-type: none"> • in (a) ' promote retrofitting of existing homes' <p>(a) is set out in the London Plan – so one would expect this to be also included in the Local Plan.</p> <p><i>GUA members might want to think about whether additional controls are needed here. Given that much of the existing housing is houses or low rise homes a developer might well say they could re-provided a higher number and density in a redevelopment, so this is a risk.</i></p> <p><i>Could ask that re-provision of homes of the same size and tenure to be added.</i></p>				

<p>iii. The proposal would not result in adverse impacts on parking and/or other local amenities.</p> <p><u>Alternative policy options</u></p> <p>1. Take a more flexible approach to the loss of existing stock</p> <p>7.48 This allows for the loss of existing residential stock for non-residential uses. This may enable greater deliverability of sites; however, proposals resulting in the loss of existing housing without it being replaced could undermine the overall housing supply.</p> <p>2. Allow the conversion of smaller family sized units and not require a proportion of these to be replaced as family homes.</p> <p>7.49 Allowing conversions of smaller family sized units without requiring their replacement would increase the overall number of new housing supplied, but it will result in a loss of family sized accommodation.</p>	<p><i>This alternative is a risk to existing communities.</i></p> <p><i>Given levels of need for family sized homes (2) would not seem sensible.</i></p>
<p>H6: Housing in the Private Rented Sector</p> <p>Preferred Policy Option</p> <p>OPDC will require new purpose built private rented accommodation, in appropriate locations, to:</p> <p>a) Meet local and London's strategic private rented housing needs;</p> <p>b) Provide an affordable housing contribution;</p> <p>c) Provide PRS for a defined period with a review mechanism or in perpetuity; and</p> <p>d) Incorporate high standards of design and provide a management strategy, committing to high standards of ongoing management of the premises.</p> <p><u>Alternative policy option</u></p> <p>1. Make it mandatory for PRS proposals to sign up to London Rental Scheme (LRS)</p> <p>7.57 Having landlords sign up to the voluntary London Rental Standard (LRS) can help to ensure a high quality standard of PRS and positively impact on the amenity of neighbouring residents. Making it a mandatory requirement for all PRS proposals to either have in place arrangements/agreements to professionally manage stock will mean an increase in associated costs and could result in some smaller schemes not being delivered.</p>	<p><i>The private rented sector is growing across London. Private renting is not the tenure of choice for most – but in the current circumstances the sector has grown significantly. In other countries (Germany for example) renting is much more the norm than it is in this country – but there are much stronger regulations around rents and quality of homes than here.</i></p> <p><u>Comment</u></p> <ul style="list-style-type: none"> • There are problems around delivering sustainable communities and lifetime neighbourhoods – impact of concentrations mostly of younger single people on neighbourhoods.

<p>H7: Housing with shared facilities <u>Preferred Policy Option</u> Proposals for new purpose built shared housing or for the net loss of the existing shared housing will be considered against the following criteria:</p> <ul style="list-style-type: none"> a. Whether meets identified local need for shared housing; b. Whether it complies with any relevant standards, including quality; c. Whether it is located in areas with a high public transport access level and facilities and services such as shops, social infrastructure etc.; and d. Whether it gives rise to unacceptable impacts on amenity. <p><u>Alternative policy option</u> 1. Encourage the conversion or loss of shared housing without replacing it. 7.63 This approach would be more responsive to market needs, but encouraging the loss of shared housing would remove this form of housing from the overall affordable housing supply. This may result in greater pressure on other forms of affordable housing.</p>	
<p>H8: Specialist housing <u>Preferred Policy Option</u> a) OPDC will require an appropriate supply of specialist care and supported needs housing for older people and/or vulnerable people to live as independently as possible. b) OPDC will require proposals to be:</p> <ul style="list-style-type: none"> i. suitable for the intended occupiers in terms of the standard of facilities, the level of independence, the provision of support or care and be accompanied by relevant management policies; ii. of an appropriate mix of sizes to meet needs; iii. of a high design quality, including inclusive design and provision of adequate internal and external space; and iv. accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers. <p>c) In the case of market-led development aimed at older people and/or vulnerable people, particularly where self-contained units are included, contributions to the supply of affordable specialist housing will be required</p>	<p><u>Comments</u></p> <ul style="list-style-type: none"> • There is a need for special needs / supported housing, as many people are currently cared for by ageing parents who will not be able to continue to provide care. • Set housing targets to meet the needs of families, older and disabled people. • Provide homes that meet lifetime standards.

<p>H9: Gypsy and Traveller Accommodation</p> <p>a. OPDC will give careful consideration to the needs of gypsies and travellers and work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to secure a sufficient supply of plots/pitches to meet the needs of existing and future gypsy and traveller households (including travelling show people);</p> <p>b. Where OPDC's Gypsy and Traveller Accommodation Needs Assessment study determines a need for provision of pitches on an additional site OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to identify a suitable site. Any new sites, pitches and/or plots for travellers should:</p> <p>i. Be accessible to transport (including safe access to/from the main road network), services and facilities, and be capable of being supported by the local social infrastructure;</p> <p>ii. Be capable of connecting to the utilities infrastructure; and</p> <p>iii. Support the health and wellbeing of the occupiers of the site by providing appropriate facilities, layout and design quality.</p>	<p><u>Comments</u></p> <ul style="list-style-type: none"> • Concern that the Gypsy and Travellers accommodation needs assessment refers back to the SHMA which in turn refers to Gypsy and Travellers need assessment. This is inadequate – and a proper needs survey must be carried out – with additional pitches provided for Gypsy and Travellers. • LGTU was not contacted by ORS on this. • Concerns that current G&T site in Bashley Road might disappear with HS2 Crossrail. It is in a very poor condition. • <i>OPDC could consider possible new sites amongst those within those coming through via its current call for sites</i>
<p>H10: Student accommodation</p> <p>a) Student housing will be supported where it:</p> <p>i. Contributes to the vibrancy and diversity of an area, especially in the early phases of the plan period;</p> <p>ii. Enhances immediate and surrounding areas;</p> <p>iii. Is of the highest design quality;</p> <p>iv. Is located in areas with high PTAL or is easily accessible by nonmotorised forms of transport;</p> <p>v. Does not result in a localised overconcentration of student housing; and</p> <p>vi. Results in no net loss of conventional housing supply, especially self-contained homes.</p> <p>b) Proposals must include:</p> <p>i. Management and maintenance plans demonstrating how the amenity of neighbouring residents will be protected; and</p> <p>ii. What steps would be taken to minimise impacts on neighbouring uses</p> <p>c) Where the proposal is not linked to a specified educational institution it will need to provide the maximum reasonable amount of</p>	<p><u>Comments</u></p> <ul style="list-style-type: none"> • This also contributes to transience and focusing of certain types of shops and facilities – not general needs amenities (concerns about developments at N Action. • <i>Should the OPDC define what it means by localised overconcentration of student housing.</i> • <i>Should the OPDC define what it defines 'affordable student housing' and what is a 'reasonable' amount?</i>

<p>affordable student housing.</p> <p><u>Alternative policy option</u></p> <p>1. Require student housing proposals to be linked to specified educational institutions</p> <p>7.85 While this may provide the required level of affordable student accommodation and the management policies of the educational institution will ensure that the development is appropriately managed, it may not enable the future flexible use of the accommodation.</p>	
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- Provide a section on self-build / custom built housing and co-operative and community based organisations? Is there a need here for a section on the quality of homes?
- Include a section on Sustainability and supporting Lifetime Neighbourhoods to include (i) Provision of homes that will last 150 years (ii) Fully integrate environmental infrastructure (including facilities for minimisation of waste and the maximisation of recycling) within housing developments (iii) Monitor displacement of existing communities in and around the OPDC area occurring as a result of increases in land values, and consider safeguarding measures (iv) Retain public land for publicly owned development to accrue long-term financial investment and management benefits. (v) Fully integrate adequate provision of social & community facilities within housing developments. (vi) Provide social and community spaces and other amenities and services that are currently lacking in established residential areas. (vii) Deter international property investment and buy to let. (viii) Restrict of properties being sold off plan in SE Asia (viii) Provision of some live – work units, perhaps on the High Street.

SOCIAL INFRASTRUCTURE	Community Comments – from previous GUA responses, the OPDC workshops and GUA meeting of 16 th March
<p>SI1: Strategic policy for social infrastructure <u>Preferred Policy Option</u> OPDC will: a) Safeguard existing social infrastructure subject to a continued need; b) Secure enhancements to existing and provide new social infrastructure to support the needs of the new population living and working in the OPDC area; c) Require high quality and inclusive design of social infrastructure; d) Promote the innovative delivery of social infrastructure; e) Promote the co-location and multi-functionality of social infrastructure; and f) Work with stakeholders to consider funding arrangements for the ongoing maintenance costs of social infrastructure. <u>Alternative policy option</u> 1. Require new social infrastructure to be provided solely on-site rather than looking to expand surrounding existing facilities. 10.10 This approach would help with place-making, by delivering a range of community facilities on-site in earlier development phases. This approach may also have benefits on the transport network as new residents would not have to travel as far to access community uses. However, this option would not help to knit the residents and employees on early sites with the existing community and may leave these sites feeling isolated in early years.</p>	<p><u>Comment</u></p> <ul style="list-style-type: none"> There is some concern that there is an ongoing loss of infrastructure around the OPDC area and that this will have a knock on impact on new development. It is not clear that this has been considered in an evidence based fashion. <p>(a) <i>Is there likely to be any social infrastructure within the OPDC area that is no-longer needed?</i></p> <ul style="list-style-type: none"> Add to (b) secure enhancements to existing and provide new social infrastructure to support the needs of the new and existing population living in the OPDC area – in an attempt to promote cohesive communities, foster diversity, interaction and social capital. <p>(f) <i>should this say 'secure' rather than 'consider'?</i></p> <p><i>What do GUA members think of the alternative policy option?</i></p>
<p>SI2: Education <u>Preferred Policy Option</u> OPDC will: a) Require proposals to provide adequate educational provision to meet the needs of development; b) Work with surrounding local authorities to identify sites for school expansion in the short/medium term; c) Allocate sites for the provision of a new all-through school (ages 3-18) and work with landowners and developers to secure sites for primary schools and nurseries; and</p>	<p><u>Add -</u></p> <ul style="list-style-type: none"> Encourage development of further education facilities to support apprenticeship schemes relevant to Park Royal industries.

<p>d) Support the establishment and growth of higher education institutions in the OPDC area.</p> <p><u>Alternative policy option</u></p> <p>1. Do not promote the OPDC area as a location for higher education uses 10.17 Instead of promoting higher educational uses to the area, this approach would instead take a more flexible approach and proposals would be assessed on a case by case basis. This approach would not preclude the provision of higher educational uses in the OPDC area. However, as London's largest development site, OPDC thinks it is right to identify the potential for the OPDC area to accommodate higher educational uses and the positive role it could play in supporting regeneration.</p>	
<p>SI3: Health Preferred Policy Option OPDC will:</p> <p>a) Support the delivery of a 'Healthy New Town' to encourage healthy living and innovation in health;</p> <p>b) Require proposals to provide adequate health provision to meet the needs of development;</p> <p>c) Ensure that new health facilities are easily accessible to all users, flexibly designed and potentially co-located within other community uses; and</p> <p>d) Support the establishment and growth of national and international health institutions in the OPDC area.</p>	<p>Comment</p> <ul style="list-style-type: none"> • There is concern that existing health facilities are closing down or have capacity problems.
<p>SI4: Community facilities Preferred Policy Option OPDC will secure a range of new high quality community facilities that:</p> <p>a) support the needs of the new population;</p> <p>b) Provide for a diverse range of community uses, such as library space, places of worship, post offices, police shops, halls for hire, youth space, adult learning and training space, community cafés, flexible office and meeting space for use by residents and voluntary sectors;</p> <p>c) are located at key destination points within the OPDC area, close to destinations of high footfall and high public transport access;</p> <p>d) are of a high design quality, promoting inclusivity; and</p>	<p>Add</p> <ul style="list-style-type: none"> • To (a) support the needs of the new and existing population • (f) Create publicly accessible public building supporting cultural, recreational and physical activity needs. • (g) Promote a sense of community ownership; supporting engaged and empowered communities. • (h) are multi-use as far as possible

<p>e) are co-located where feasible with other community or town centre uses.</p>	
<p>SI5: Pubs <u>Preferred Policy Option</u> OPDC will protect pubs unless it can be demonstrated that for at least 12 months: a) the pub is no longer a viable business, demonstrated through accounts data; and b) the property has been appropriately marketed for a continuous period and no suitable offer has been made. <u>Alternative policy option</u> 1. OPDC takes a more flexible approach to the loss of public houses and does not set out stringent requirements for information on accounts and marketing of the property. 10.37 This approach would have potential advantages of it allowing for the optimisation of development on sites occupied by public houses. This approach may however result in the loss of pubs that provide a valued community facility and has therefore not been identified as the preferred policy option.</p>	

SUSTAINABLE DEVELOPMENT	
<p>SD1: Sustainable development</p> <p>a) When considering development proposals, OPDC will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area;</p> <p>b) Planning applications that accord with the policies in this Local Plan, the London Plan, the West London Waste Plan and, where relevant, with policies in neighbourhood plans will be approved without delay, unless material considerations indicate otherwise;</p> <p>c) Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then permission will be granted unless material considerations indicate otherwise – taking into account whether:</p> <p>i) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or</p> <p>ii) Specific policies in the NPPF indicate that development should be restricted.</p>	<p>These sections are from the National Planning Policy Framework -</p> <div data-bbox="1030 303 2013 593" style="background-color: #e0f2f7; padding: 10px;"> <p>International and national bodies have set out broad principles of sustainable development. Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy <i>Securing the Future</i> set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.</p> </div> <p>7. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:</p> <ul style="list-style-type: none"> • an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure; • a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and • an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy. <ul style="list-style-type: none"> • <i>Should the OPDC require a statement from developers, as part of each planning application, how they will satisfy the guiding principles of 'Sustainable development' – specifically in the context of the OPDC area?</i>

TOWN CENTRE USES	Comments from Charrette and Community Visions and Objectives and GUA meeting 16 th March
<p>TC1: Strategic policy for town centre uses OPDC will support proposals for town centre uses that:</p> <p>a) Provide locally and strategically significant culture, sports and leisure facilities, that act as catalysts for regeneration and help strengthen London's position as the world's cultural capital;</p> <p>b) Provide a range of A-class uses that serve the needs of existing and new residents, employees and visitors in terms of their location, scale and phasing;</p> <p>c) Create a network of new town centres that are the focus for town centre uses and which complement London's wider network of centres;</p> <p>d) Add to the activation and vibrancy of the area and help to create a sense of place;</p> <p>e) Promote social and economic regeneration and healthy lifestyles; and</p> <p>f) Deliver best practice in terms of implementing innovative technology, design and management of spaces to support long term sustainability.</p> <ul style="list-style-type: none"> • A1 Shops - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes. • A2 Financial and professional services - Financial services such as banks and building societies, professional services (other than health and medical services) and including estate and employment agencies. It does not include betting offices or pay day loan shops - these are now classed as "sui generis" uses (see below). • A3 Restaurants and cafés - For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes. • A4 Drinking establishments - Public houses, wine bars or other drinking establishments (but not night clubs). • A5 Hot food takeaways - For the sale of hot food for consumption off the premises. • D1 Non-residential institutions - Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non residential education and training centres. • D2 Assembly and leisure - Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreations (except for motor sports, or where firearms are used). 	<p>Questions:</p> <p><i>How about that (a) instead says - serves existing and new residential communities and also attract visitors – rather than 'help to strengthen London's position as the world's cultural capital'?</i></p> <p><i>Shouldn't (B) not also include class D uses?</i></p> <p><i>Should (c) say which complement and support "existing nearby centres"?</i></p> <p><i>Should the following be added?</i></p> <p>Add (g) support the retention of existing shops and services</p> <p>Add (h) 'conserve, enhance and memorialise the significance of the heritage of the area'</p> <p>Add (i) that supports walkable networks within the OPDC area</p> <p>Comments from Charrette:</p> <ul style="list-style-type: none"> • The OPDC should focus on developing human scale, healthy neighbourhoods within and around the OPDC boundary. There are existing centres that can be regenerated and serve existing and new residential areas by planning based on walkable distances. The focus of the development should not be conceptualised around the Old Oak Common station but around community hearts linked by pedestrian and cycling networks and high quality streets and spaces.
<p>TC2: Town centre hierarchy Preferred Policy Option</p> <p>a) OPDC will support development that delivers the following town centre hierarchy:</p> <p>i. Old Oak High Street – a potential new Major Centre within Old Oak (see Policy P3);</p> <p>ii. North Acton - a potential new Neighbourhood Centre close to North Acton Station (see</p>	<ul style="list-style-type: none"> • Concern was expressed at the GUA meeting on 16th March that larger stores on the High Street should be focused at the South end – to assist in providing some protection to Harlesden as a locally based Town Centre with a range of shops that meet the

<p>Policy P7); and</p> <p>iii. Park Royal – a Neighbourhood Centre in the middle of the Park Royal Industrial Estate (see Policy P6).</p> <p>b) Existing edge or out of centre town centre uses will be protected where they meet local needs;</p> <p>c) Proposals for new town centre uses on the edge of or outside of town centres may be appropriate but only where a sequential approach has been taken to site identification, looking firstly within centres and secondly on the edge of centres and where they;</p> <p>i. Address identified deficiencies in need;</p> <p>ii. Reduce the need to travel by car and do not have an adverse impact on the operation of the road network;</p> <p>iii. Support placemaking;</p> <p>iv. Do not impact on the functioning of Strategic Industrial Locations; and</p> <p>v. Do not have an adverse impact on, and support the role and function of, designated centres.</p> <p>d) OPDC will require developers to submit an impact assessment for schemes:</p> <p>i. providing over 5,000sqm of town centre uses in the Old Oak High Street Major Centre; and</p> <p>ii. providing over 2,500sqm of town centre uses gross elsewhere (and including both the North Acton and Park Royal centres).</p> <p><u>Alternative policy option</u></p> <p>1. Identify Old Oak High Street as a Metropolitan Centre.</p> <p>9.21 This option would provide the opportunity to increase the scale of town centre uses in the Old Oak area. This option would have benefits in terms of making Old Oak an attractive destination and could have benefits for placemaking by attracting higher footfall. However, this option could impact on the vitality and viability of the surrounding town centre hierarchy. It may also dilute investment in other centres and could also impact on a wider catchment and a greater number of town centres in west London. The greater quantum of retail on Old Oak High Street could also make it more difficult to let space. 9.22 Examples of other 'metropolitan' town centres in London are Ealing, Shepherd's Bush and Kingston.</p> <p>2. Two centres are designated in Old Oak - a District Centre to the north of the canal and a Neighbourhood Centre around Old Oak Common Station.</p> <p>9.23 This option would limit the quantum of town centre uses to look to minimise impacts on nearby town centres such as Harlesden, Ealing and Shepherd's Bush. However, this approach would not provide sufficient floorspace to cater for the needs arising from development. The London Plan explains that typically District Centres contain 10,000-50,000sqm retail, leisure and service floorspace and that Neighbourhood Centres, would by virtue, be at either the lower end of this range or below 10,000sqm.</p>	<p>needs of ethnically diverse communities.</p> <p>Comment from Charrette were :</p> <ul style="list-style-type: none"> • Making Harlesden shopping worth a visit from NEW Old Oak Common • That the development has improved neighbouring areas in particular Kensal Green High Street <p>The evidence base document highlights</p> <ul style="list-style-type: none"> • threats to both Harlesden and Ealing • spatial arrangement of the High Street functions - along a long High Street with active frontage. <p>What kind of protection is needed for Harlesden? Should plans be for more retention?</p> <p>A metropolitan Centre is higher up in the hierarchy than a town centre – Shepherds Bush and Ealing are Metropolitan Centres.</p>
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The Retail and Leisure Needs Study identifies a quantitative need for 52,500sqm of A-class floorspace alone in Old Oak during the plan period and consequently, designating a District Centre and Neighbourhood Centre would be likely to only provide sufficient floorspace to provide for retail needs and would not allow for the provision of a significant quantum of culture, sports or leisure uses within these centres. The approach of designating a Neighbourhood Centre around the Old Oak Common Station would also fail to capture the catalytic impact that the station could have on the immediate area and wider hinterland. The Old Oak Common Station is estimated to have approximately 250,000 passengers a day interchanging (embarking or disembarking). There is a significant opportunity for the land uses around the Old Oak Common Station to attract these passengers who are interchanging into the surrounding hinterland and to help activate the place and capture economic benefits for the area and its hinterland and this opportunity would be limited through the designation of a Neighbourhood Centre here, rather than a Major Centre.

9.24 Examples of other District Centres in the area are Harlesden, Hanwell and Portobello Road and examples of other 'neighbourhood' centres in the area are East Acton, Kensal Rise and Perivale.

3. Two centres are designated in Old Oak - a District Centre to the south of the canal around Old Oak Common Station and a Neighbourhood Centre to the north of the canal.

9.25 As with option 2 above, this option would seek to limit the quantum of town centre uses to minimise impacts on nearby town centres. As above, it is unlikely that a district and neighbourhood centre would provide sufficient floorspace to cater for the needs of development and certainly would not provide a policy framework for the establishment of strategic culture, sports and leisure uses in the area.

9.26 The designation of a district centre to the south of the Grand Union Canal would better capture the scale of need for town centre uses arising from the population living, working and visiting the area than in option 2. However, to the north of the canal, the designation of a Neighbourhood Centre would not be capable of providing sufficient town centre uses to meet the areas need. This could be met to a certain degree by the District Centre at Old Oak Common Station and the District Centre at Harlesden, but there would also be a risk that premises in this area would struggle and the limited quantum of town centre uses may impact on placemaking

4. Park Royal is not identified as a Neighbourhood Centre and a different approach is taken to town centre uses in the area.

9.27 The town centre uses in the centre of Park Royal, in particular the ASDA supermarket, generate significant volumes of traffic which have an impact on the ability of Park Royal to function as an industrial estate. An approach to minimise this impact might be to dedesignate the centre and allow for its gradual erosion to other uses such as employment

<p>and residential including local 'walk to' services. However, this approach could also result in worse impacts on the highway network if the town centre uses are dispersed requiring employees and residents to travel further for their services. It would also see the loss of well used existing local services over time.</p>	
<p>TC3: Vibrancy <u>Preferred Policy Option</u> To promote the role that town centre uses can play in shaping high quality places in Old Oak and Park Royal and ensure that designated centres are vibrant and viable, OPDC will:</p> <ul style="list-style-type: none"> a) Support the role town centre uses can play in delivering high quality places by encouraging proposals that: <ul style="list-style-type: none"> i. Provide for outdoor uses such as eating and drinking uses with outdoor seating, event space and street markets where viable and where they do not detract from residential amenity. Any proposals for street markets would need to be accompanied by a management plan; ii. Deliver and maintain high quality accessible shopfronts; and iii. Deliver and maintain high quality overlooked public realm. b) Encourage the provision of meanwhile uses in early development phases (see OSP5); c) Support innovation and flexibility so that uses can expand and/or change between use classes subject to demand and appropriate permissions/agreements; d) Require proposals for A-Class uses (retail and food and drinking establishments) to provide a mix of unit sizes, including at least 10% of floorspace for units of 80sqm or less to support independent retailers. Applicants should actively market these units within the local communities; e) Require proposals: <ul style="list-style-type: none"> i. Providing over 2,500sqm of A-class floorspace to submit a Retail Vision Statement; and ii. Providing over 2,500sqm of town centre use floorspace to submit a Cultural Action Plan. f) Support the creation of a healthy new part of London by supporting uses that have a positive impact on health and well-being and restricting planning applications for: <ul style="list-style-type: none"> i. betting shops, pay-day loan shops and games arcades; and ii. takeaways (Class A5 uses), particularly where they are in close proximity to primary and secondary schools. <p><u>Alternative policy option</u> 1. Take a more flexible approach to betting shops, pay-day loan shops and takeaways.</p> <p>9.38 This option would not look to resist these uses and would instead consider proposals for such uses on their merits, having regard to their impact on amenity, transport and other Local Plan considerations. The benefits to this approach would be that it would be more</p>	

<p>responsive to market demands. However, the option would have significant negatives as it could result in the proliferation of these uses and would not promote OPDC's role as a healthy new part of London.</p>											
<p>TC4: A-Class needs</p>											
<p><u>Preferred Policy Option</u></p> <p>a) A -class uses (retail and eating and drinking establishments) should serve the needs of the development and complement nearby centres. This will be achieved by requiring developers to:</p> <p>i. Accord with the quantitative need identified below:</p> <table border="1" data-bbox="143 464 580 858"> <tr> <td></td><td>Local Plan Period (2037)</td></tr> <tr> <td>A1</td><td>27,950 - 33,450 sqm</td></tr> <tr> <td>A1 service and A2</td><td>15,100 - 18,500 sqm</td></tr> <tr> <td>A3-A5</td><td>10,650 - 12,150 sqm</td></tr> <tr> <td>Total</td><td>53,700 - 64,100 sqm</td></tr> </table> <p>ii. Submit a masterplan showing how their proposals fits within a wider comprehensive approach and how their retail provision interacts with provision in neighbouring schemes;</p> <p>iii. Demonstrate through robust justification and evidence that the proposals would not adversely affect the vitality and viability of nearby centres where proposals would exceed the quantitative need; and</p> <p>iv. Submit a 'Town Centre Enhancement Strategy' where proposals are likely to have an impact on nearby centres;</p> <p>b) In the Local Plan period, A-class uses should be broadly distributed across the town centre hierarchy as follows:</p> <p>i. Approximately 52,500sqm in Old Oak High Street Town Centre;</p> <p>ii. Approximately 5,000sqm in North Acton Neighbourhood Centre; and</p> <p>iii. Approximately 5,000sqm in Park Royal Neighbourhood Centre.</p> <p><u>Alternative policy option</u></p> <p>1. Identify OPDC as a more significant retail destination with a higher quantum of retail over and above that required to serve the needs of the development.</p> <p>9.45 This option would have potential benefits in terms of placemaking, by creating a greater</p>		Local Plan Period (2037)	A1	27,950 - 33,450 sqm	A1 service and A2	15,100 - 18,500 sqm	A3-A5	10,650 - 12,150 sqm	Total	53,700 - 64,100 sqm	<p>Question:</p> <p><i>How does this relate to the number and types of new jobs?</i></p> <p><i>How is this need measured?</i></p> <p><i>(iv) Does this contradict (iii)?</i></p>
	Local Plan Period (2037)										
A1	27,950 - 33,450 sqm										
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Total	53,700 - 64,100 sqm										

<p>retail draw and providing more opportunities for active uses. However, this option could impact on the vitality and viability of surrounding retail centres and as a consequence, this policy approach has not been identified as the preferred option.</p>	
<p>TC5: Culture, sports and leisure facilities <u>Preferred Policy Option</u> Proposals for culture, sports and leisure facilities will be required to: a) Support the creation of a cultural, sporting and leisure destination at Old Oak, serving both a local and a London-wide catchment; b) Help support placemaking and/or act as a catalyst for regeneration; c) Not give rise to unacceptable impacts on amenity and transport; and d) Provide affordable access for local communities. <u>Alternative policy option</u> 1. Set a quantum threshold for culture, sports and leisure uses. 9.51 This option would identify an indicative floorspace figure for non A-class town centre uses such as for leisure, sports and culture. It would provide a clearer indication of the acceptable quantum of floorspace for other town centre uses, providing greater certainty to stakeholders. However, this approach would constrain the ability for these sorts of uses to aid with placemaking and could potential prevent a major cultural, sports or leisure use from locating the area that could act as a catalyst for regeneration and provide a strategic cultural or leisure destination.</p>	<p><u>Comments from Charrette</u></p> <ul style="list-style-type: none"> • Many people in the area doing and making things that are vital for West London such as mechanics, dress makers, photographers, furniture makers. They be not be displaced from the area but integrated into the future plans. • Develop a Cultural Centre for arts and humanities and the creation of new strategies for community managed spaces and places, including focusing on the needs of young people. This will create a positive focus, help to unite, bring cohesion and help to integrate existing and new residents.
<p>TC6: Visitor accommodation OPDC will contribute to London's visitor infrastructure and London's overall need for an additional 40,000 high quality hotel bedspaces by 2036 by: a) Supporting proposals for visitor accommodation within OPDC's designated town centres and/or within area of high public transport accessibility; b) Requiring proposals to provide at least 10% of hotel bedrooms as wheelchair accessible and submit Accessibility Management Plans; c) Providing a range of types of visitor accommodation over a range of affordabilities; d) Promoting the provision of business hotels and multi-functional convention facilities; and e) Promoting high quality design and protecting the amenity of nearby residents</p>	<p>Question: <i>Is this number included in the OSP2 for land uses? How much land will be required?</i></p> <p><i>How is the number of bed-spaces assessed? It sounds a lot. How does this fit with notions of creating lifetime neighbourhoods?</i></p>
<p>TC7: Evening night time economy <u>Preferred Policy Option</u> a) Planning permissions for eating and drinking establishments and culture, sports and entertainment uses, either as the main or as the ancillary use, will be the subject of conditions controlling hours of operation to minimise their impact on residential amenity; b) There will be a presumption that:</p>	

<p>i. Within designated centres premises should close by 00:00; and</p> <p>ii. Outside of designated centres premises should close by 23:00.</p> <p>c) Proposals for extended opening hours beyond the limits outlined under b) would need to demonstrate that:</p> <p>i. there would be no detrimental harm to the amenity of neighbours resulting from the facility itself or from those travelling to and from the facility; and</p> <p>ii. the proposal would not result in harmful cumulative impacts in association with other late licensed properties.</p> <p><u>Alternative policy option</u></p> <p>1. Take a more flexible approach to hours of operation for nighttime economy uses in Old Oak, particularly in vicinity of Old Oak Common station.</p> <p>9.64 OPDC is promoting the Old Oak area as a destination for catalyst uses, including culture, sports and leisure uses and other night-time economy uses. To support this aspiration, a more flexible approach to the hours of operation for night-time economy uses could be taken, particularly in close vicinity to the Old Oak Common station and along Old Oak High Street. Such uses and new homes being delivered in the Old Oak area could be designed to minimise the noise and light impacts of these late night uses; however, consideration may need to be given to the cumulative impact of these uses if a more flexible approach to hours of operation were to be taken.</p>	
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OPDC Local Plan TRANSPORT p.250-	Community Comments
<p>T1: Strategic policy for transport</p> <p><u>Preferred Policy Option</u></p> <p>OPDC will support proposals that:</p> <p>a) Deliver a state of the art, safe and accessible transport system, by providing infrastructure that connects communities and helps facilitate growth in and around the Old Oak and Park Royal area;</p> <p>b) Ensure new transport infrastructure is fully embedded into the area and that Old Oak and Park Royal is fully integrated with its surrounding areas.</p> <p>c) Prioritise sustainable transport modes and support modal shift from private cars; and</p> <p>d) Implement and safeguard future innovative and smart technologies that maximise the efficiency and interoperability of the transport network.</p> <p><u>Alternative policy option</u></p> <p>1. Giving priority to car travel</p> <p>This policy option would support proposals which prioritise cars above more sustainable modes, which may benefit some businesses and residents. However, by facilitating the use of private vehicles, congestion, noise and emissions would increase and fewer people would make journeys by foot, bike or public transport impacting on health and well-being.</p>	<ul style="list-style-type: none"> • Address existing transport problems. • Apply a user hierarchy with pedestrian priority to provide walkable, lifetime neighbourhoods. • Clearly analyse and plan for the differing requirements arising from Old Oak's function as a major transport hub and its local neighbourhood provision. • Provide exemplar, sustainable, well-connected and walkable lifetime neighbourhoods supporting both new and long established residential communities, well linked with surrounding areas • Minimise the scale, complexity and cost of transport infrastructure in the area. • Ensure that the needs and user experience of the through traveller and that of the local user has been carefully considered and their differing requirements catered for. • Segregate vehicle, cycling and pedestrian routes – to protect older and disabled people and those walking with small children. • OPDC should work with TFL and the Boroughs of Ealing, Hammersmith and Fulham and Brent to address existing transport issues with the boroughs including – the A40, the route from the A40 into Park Royal and Du Cane Road. • Prevent any rail links being close to bedroom windows of residential buildings. • Ensure the high street is accessible only to pedestrians and cyclists with certain essential sections being accessible to buses. • Provide a main eastern entrance to the Old Oak Common HS2 station, with a road connection to Scrubs Lane so as to relieve the use and dependency on Old Oak Common Lane • Maximise use of the Grand Union Canal for transportation of materials through all demolition and

	<p>construction phases and thereafter the functioning of the development. Provide off-site consolidation facilities and use of prefabricated building components. This aims to reduce already high levels of air pollution and congestion on existing roads and minimise on levels of noise dust and vibration from delivery and servicing.</p> <p>Comment: <i>There is no mention of the existing community and their needs.</i></p> <ul style="list-style-type: none"> Existing communities are not connected. To resolve the problem of connectivity and travel between points, there could be a loop going service, like DLR going around the area. <p>(Charrette)</p> <p><i>Should b include sensitively?</i> <i>Should their hierarchy of transport modes more strongly be set out in this policy?</i></p>
<p>T2: Walking Development proposals will be required to:</p> <ul style="list-style-type: none"> a) Provide high quality, safe, direct and accessible walking networks; b) Support healthy lifestyles; c) Provide new and enhance existing walking infrastructure; d) Maximise active frontages and promote a fine grain development that creates an interesting and varied streetscape; e) Connect to existing and planned pedestrian links in the wider area; and, f) Support and provide infrastructure for the Legible London scheme. 	<p><i>It is positive that Walking comes first (but in reality is this the case?)</i></p> <p>Add</p> <ul style="list-style-type: none"> Develop walkable lifetime neighbourhoods. Segregate cycling and pedestrian routes <p>Comment:</p> <ul style="list-style-type: none"> It is very difficult for older and disabled people and those walking with small children to navigate places where cyclists are not segregated from pedestrians. The footpaths should be wide enough. For example Park Royal has very narrow streets d) should be strengthened by adding encourage the creation of pleasant and green walking surface <p>(OPDC workshop)</p>
<p>T3: Cycling Development proposals should:</p>	<p>b) is good, but segregation of cyclists and pedestrians should be</p>

<p>a) Provide state of the art cycling infrastructure; b) Provide new and enhance and provide links to existing, cycle connections to ensure they are safe, convenient and direct, but not to the detriment of pedestrians; c) Implement signage to improve cycle wayfinding and legibility; d) Promote and help to deliver cycle hire schemes within the OPDC area; e) Promote safety and security measures for cyclists; and f) Require secure, integrated, convenient and accessible cycle parking facilities that at least meet the standards set out in the London Plan.</p>	<p>added (as above)</p> <ul style="list-style-type: none"> • Turn the unused bridge across the Central Line (Acton Main Line) into a tunnel for a cycling net <i>(OPDC workshop)</i>
<p>T4: Rail Development proposals will be supported where they: a) Facilitate the delivery of: i. a state of the art rail station at Old Oak Common with the highest quality architecture that provides interchange between HS2, Crossrail and National Rail services; ii. two new London Overground stations and supporting infrastructure including high quality links to the HS2/ Crossrail station; iii. substantial capacity improvements to existing London Underground and Overground stations, particularly Willesden Junction and North Acton; iv. an exceptionally designed intermodal interchange; v. links between stations that facilitate the safe, efficient and sustainable movement of passengers; vi. improved services on existing infrastructure; vii. a rail connection between the Great Western Mainline (GWML) and the West Coast Mainline (WCML); b) Ensure that the impact on existing rail infrastructure is minimised during construction; c) Enable new rail routes to improve connections to the OPDC area; and d) Enable future proofing of station design and services to enable smart technology to be implemented.</p>	<p>Comment:</p> <ul style="list-style-type: none"> • North Acton is adding 10.000 people now from new developments that are happening, e.g. Perfume Factory creating over capacity problems to the station. The station needs to be changed now, not in 20 years. They are also expecting workers that will come to the development for construction. <p>Add:</p> <ul style="list-style-type: none"> • Provide clear and accessible information and signage in rail and underground stations, tunnels and connections including where assistance is available to elderly and disabled users. • Prevent any rail links being close to bedroom windows of residential buildings. <p>Rail Connections suggestions:</p> <ul style="list-style-type: none"> • <i>Connect Park Royal to North Acton (using the existing old station in between) and Old Oak Common Lane</i> <i>(OPDC workshop)</i>
<p>T5: Buses Proposals should deliver/contribute to: a) Increases in bus frequencies on existing routes and new and</p>	<p>Add (from previous GUA member comments) :</p> <ul style="list-style-type: none"> • Involvement of community members in the planning of bus routes.

<p>extended bus routes;</p> <p>b) Infrastructure to improve bus journey time reliability including bus priority measures;</p> <p>c) New and improved bus stops, including access to real-time travel information at bus stops;</p> <p>d) Supporting the roll out of greener buses; and</p> <p>e) Clear and legible signage for bus users.</p>	<ul style="list-style-type: none"> • Enhancement of existing bus routes; addressing existing frequently mentioned failures • Link neighbourhoods and provide links to social infrastructure, and shops
<p>T6: Roads and streets</p> <p>Development proposals should:</p> <p>a) Provide a range of new streets that help overcome severance and optimise connectivity;</p> <p>b) Enhance existing streets and junctions to mitigate the impacts of development on the surrounding local and strategic road network;</p> <p>c) Deliver high quality streets with robust and coordinated materials that integrate effectively with the wider public realm;</p> <p>d) Ensure that streets give priority to pedestrians, cyclists and buses; and</p> <p>e) Promote effective and integrated management of streets to futureproof for innovations in technology.</p>	<p>Add (from previous comments and OPDC workshop)</p> <ul style="list-style-type: none"> • Address existing transport problems. (The current road network is often congested). • The high street should be accessible only to pedestrians and cyclists with certain essential sections being accessible to buses. • Prevent any route from HS2 Station direct to the Scrubs • Provide a main eastern entrance to the Old Oak Common HS2 station, with a road connection to Scrubs Lane so as to relieve the use and dependency on Old Oak Common Lane • An alternative vision for Old Oak Lane, to that of a busy connection between the A40 and Harlesden Town Centre, is for a less busy street; one that is principally for buses and local residents' access. One proposal that this can be achieved by is a new link road from the West Coast Main Line bridge to a proposed Harlesden bypass. Positively half of the route suggested at the Harlesden Bypass is on the map of street routes (page 253). It stops though at Waxlow Road. It should continue as follows: <ul style="list-style-type: none"> - crosses Acton Lane and the canal; continues via Atlas Road with a junction to the proposed Old Oak Lane bypass to the current crossroads with Victoria Road-Old Oak Lane: and continues beyond the eastern side of the existing Old Oak Common Lane Bridge over the North London Line to cross the canal again via a new bridge to Hythe Road and onto Scrubs Lane. • The Grand Union Street should not be a primary route <p>Comment</p> <p><u>Some of the existing transport problems:</u></p>

	<ul style="list-style-type: none"> - Old Oak Common Lane being the main north-south road in the area. - Problems of the A40 often being at full limits and, as a result, increased use of Du Cane Road which then also becomes grid locked and the route from the A40 into Park Royal being a rat run. - Victoria Road - Hythe Road
<p>T7: Car parking</p> <p><u>Preferred Policy Option</u></p> <p>OPDC will ensure the development area is an exemplar of low carbon development and will promote a modal shift towards more sustainable modes by:</p> <p>a) In Old Oak:</p> <ul style="list-style-type: none"> i. Limiting car parking to 0.2 spaces per unit for residential developments; ii. Promotion of car free development close to public transport hubs; and iii. Securing zero car parking for non-residential developments, except for blue badge holders. <p>b) In Park Royal:</p> <ul style="list-style-type: none"> i. Limiting car parking to 0.2 spaces per unit for residential developments; and ii. Allowing limited car parking for non-residential development taking into account access to public transport and operational or business needs. <p>c) When providing car parking, proposals should:</p> <ul style="list-style-type: none"> i. incorporate electric charging points for electric vehicles at all new parking spaces; ii. include and promote provision for car club vehicles and car sharing; iii. be sensitively designed; and iv. not take precedence over other street level users or the incorporation of open space, public realm or open space. <p>d) Proposals should provide suitable facilities to cater for anticipated demand for taxis and coaches.</p> <p><u>Alternative policy options</u></p> <p>1. Setting less stringent car parking standards.</p>	

<p>11.60 This policy option would offer greater choice. However, transport modelling outputs indicate this is likely to place unacceptable impacts on the surrounding road network, discourage a mode shift towards the use of more sustainable transport modes and increase emissions. As such this policy goes against OPDC's aspirations and the transport policies detailed in this draft Local Plan.</p> <p>2. Car free – no residential car parking. Only blue badge.</p> <p>11.61 This policy option would enable a modal shift towards the use of more sustainable transport modes and would reduce traffic flow and congestion. However a low amount of car parking spaces is considered necessary to meet the essential needs of development, particularly ensuring that there are suitable places for disabled people, car clubs and electric cars. A car free policy option would also negatively impact businesses that rely on private vehicles, particularly in Park</p> <p>3. Take a more flexible approach to parking standards for new commercial developments in Old Oak.</p> <p>11.62 A more flexible approach to providing parking spaces for new commercial developments could be more beneficial for businesses, helping to attract them to Old Oak. However, allowing a more flexible approach to parking would be incredibly difficult to manage given the potential number of businesses and their varying uses. The high level of public transport accessibility negates the need for dedicated parking spaces for businesses and the additional vehicles would add to congestion, noise and air quality issues.</p>	
<p>T8: Freight, servicing and deliveries</p> <p><u>Preferred Policy Option</u></p> <p>OPDC will require proposals to:</p> <p>a) Secure Delivery and Servicing Plans (DSPs) through planning agreements;</p> <p>b) Identify potential sites for consolidation centre(s) and lorry holding areas;</p> <p>c) Require off-street servicing facilities within new developments, ensuring this does not impact on the public realm;</p> <p>d) Encourage the provision of facilities for home deliveries within residential developments;</p> <p>e) Provide opportunities for click and collect sites;</p>	<p>Comments from previous GUA discussions/ responses</p> <ul style="list-style-type: none"> • Provide off-site consolidation facilities and use of prefabricated building components. This aims to reduce already high levels of air pollution and congestion on existing roads and minimise on levels of noise dust and vibration from delivery and servicing • minimise noise and vibration relating to delivery and servicing.

<p>f) Identify more efficient and sustainable ways of delivering goods including encouraging the use of cargo bikes;</p> <p>g) Ensure that the operators of all freight vehicles operating in the area have attained the Gold Fleet Operator Recognition Scheme (FORS) accreditation so that they have made proven efforts to reduce emissions; and</p> <p>h) Implement and safeguard for future innovative and smart technologies in relation to freight that maximise the efficiency and interoperability of the transport network.</p> <p><u>Alternative policy options</u></p> <p>1. No controls over deliveries and servicing. 11.70 This policy option may have some attraction for businesses. However, if no measures were put in place to control servicing and deliveries, HGVs and LGVs flow would increase drastically, exacerbating the congestion issues in the development area, as well as having noise and environmental impacts, affecting the public realm and using up road space.</p> <p>2. Ban deliveries and servicing by larger vehicles. 11.71 This policy option would provide benefits to the public realm, pedestrians and cyclists and would reduce the congestion sometimes caused by HGVs. However, banning larger vehicles completely would negatively impact businesses.</p>	
<p>T9: Construction Preferred Policy Option Development proposals should:</p> <p>a) Provide for measures to reduce freight and construction trips, by:</p> <p>i. Securing a Construction Logistics Plan and Construction Code of Practice from major developments;</p> <p>ii. Promoting the use of freight and construction consolidation centres;</p> <p>b) Make maximum use of rail and water transport for construction and freight; and</p> <p>c) Co-ordinate and phase construction projects to enable the transport impacts to be effectively mitigated.</p>	<p>Add:</p> <ul style="list-style-type: none"> • Involve the community must be part of the process and construction phasing should be managed so that particular areas don't become permanent building sites. Considerate contractor schemes should be implemented including good communication with the community to help minimise inconvenience. • Prefabricated building components should be promoted. Appropriate method of construction, including related transport, agreements should be part of the planning approval process.

Some additional points:

- The Walking Streets and Public Realm document has not been published yet. How will this document affect the policies outlined here?
- Although, the policies don't provide specific routes, the images and maps do. Same with the freight and construction consolidation centre, which is located at the Hs2 area (there is no image of that, but there was at the workshop and there is a relevant consultation question). This is something that Tom Cohen pointed out in his presentation saying out that there are drawings that indicate that some things have been decided already. How can we address this?
- A range of scenarios with more visionary approaches to the nature of the network and available transport should be carried out and be made available for public scrutiny/consultation. The current proposals are quite traditional given the transport changes (driverless cars and demand-responsive transport for example) that are likely to occur between now and completion of development. *(From OAPF)*
- There should be a statement committing the OPDC to make positive relationships with canal freight companies and relevant public bodies in order to maximise possible use of the canal and minimise transportation of construction materials by road. A commitment to developing a plan of action for maximum canal use during all construction phases should be stated here involving engagements with Cross Rail, HS2 and all developer planning applications.
- *Should this themed section include a policy relating to the canal?*