Old Oak and Park Royal Development Corporation Local Plan

Integrated Impact Assessment

Scoping Report

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Report No

Date 3 September 2015

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1 Introduction

1.1 Purpose of the SA Scoping Report

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

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

The Scoping Report represents the initial stage in the SA process for the emerging Local Plan and sets the scope for the remainder of the process. Its purpose is to:

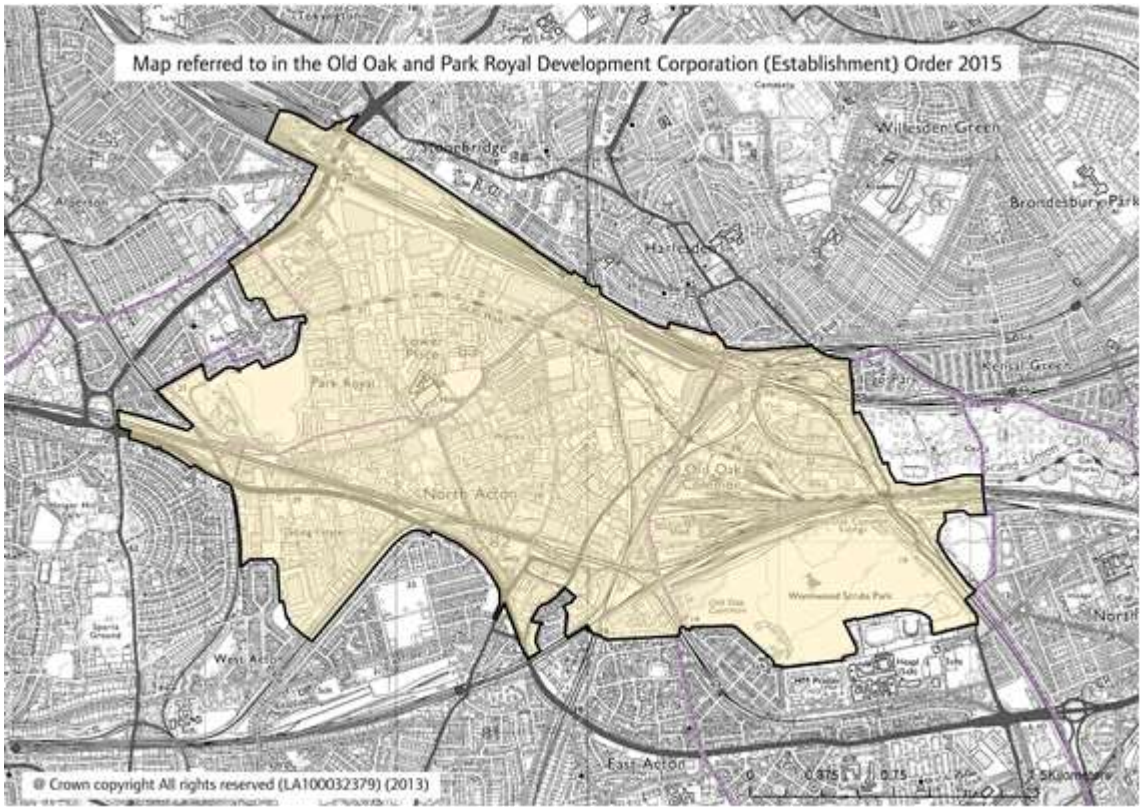
- Set the scope and level of detail of the SA;
- Identify relevant plans, policies, programmes and initiatives that will inform the SA process and the Local Plan;
- Identify relevant baseline information;
- Identify key sustainability issues and problems; and
- Present an SA Framework, consisting of sustainability objectives and indicators, against which the Local Plan can be assessed.

The SEA Directive requires the authority preparing the plan to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). The preparation of a Scoping Report provides the most effective means of undertaking this consultation by providing the consultees with a document upon which they can make comments.

1.2 The Local Plan

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

Figure 1-1 OPDC Boundary



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

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

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

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

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

1.3 The London Plan and emerging Opportunity Area Planning Framework

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

The emerging Opportunity Area Planning Framework for Old Oak and Park Royal provides supplementary guidance to the London Plan to help to shape the regeneration of Old Oak and enhancement of Park Royal. It is expected to be adopted by the Mayor of London in October 2015.

1.4 Integrated Impact Assessment

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

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

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

1.5 Sustainability Appraisal and Strategic Environmental Assessment

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

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

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

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

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

1.6 Health Impact Assessment

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

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

According to the NHS London Healthy Urban Development Unit:

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

OPDC, like the GLA, aspire to deliver the following at a local level:

- ensure there are enough homes meeting the needs of Londoners at all stages of their lives and whatever their circumstances, and designed so they actively enhance the quality of the neighbourhoods in which they are located;
- tackle London's persistent problems of deprivation and exclusion - and in particular the unacceptable health inequalities that exist in one of the wealthiest cities in the world - in order to ensure equal life chances for all;
- protect and improve London's natural environment and habitats and its general environmental quality at both local and London-wide levels (and recognising the links between the two), with action to target problems of air quality and other forms of pollution;
- deliver a network of vibrant and exciting town centres with a range of shops and other facilities;
- ensure all Londoners can have access to good quality and healthy food;
- ensure Londoners in all parts of the city have adequate efficient transport networks and services, and the support for cycling and walking, to enable them to access job, social

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

and other life opportunities, while minimising any adverse impacts on the environment or quality of life;

- recognise, and actively realise, the whole range of benefits which networks of green and open spaces and waterways bring;
- deliver a range of readily accessible community and cultural facilities meeting the needs of a growing and increasingly diverse population;
- take effective steps to ensure Londoners feel safe in their city and their local neighbourhoods, and do not have to feel constrained in going about their lives by crime and fears about their safety; and
- protect and enhance what is distinctive about the city and its neighbourhoods, securing a sense of place and belonging through high quality architecture and design that sits well with its surroundings.

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

1.7 Equalities Impact Assessment

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

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

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

1.8 Habitats Regulations Assessment

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

A HRA screening exercise will be undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This

process will be documented in a Screening Report that will be submitted to Natural England for approval.

This is a parallel process to the IIA process and will be reported separately. However, its findings will be relevant to the IIA and *vice versa* so the two processes will need to interact. The NPPG[3] states that *'the sustainability appraisal should take account of the findings of a Habitats Regulations Assessment, if one is undertaken.'*

1.9 Consultation

1.9.1 SA Workshop

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

1.9.2 Formal Consultation

In accordance with regulation 12(5) of the SEA Regulations, this Scoping Report will be consulted upon for a five week period with the statutory SEA bodies, which include:

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

This Scoping Report will be made available for comment on OPDC's website for the general public and other stakeholders during the consultation period, as well as being sent directly to the IIA Workshop attendees (see Appendix A). Comments received will be taken forward to inform the IIA process.

1.9.3 Additional Consultation

An important element of the IIA, HIA and EqIA in particular, is to engage the community throughout the development of the Local Plan. As such, key representatives from the community will be consulted. These representatives have been identified in collaboration with the OPDC Community Engagement Officer.

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

2 Scope of the IIA (incorporating SA, SEA, HIA, EqIA and HRA)

2.1 Introduction

The following section describes the proposed spatial, temporal and technical scope of the assessments to be undertaken as part of the IIA.

2.2 Spatial Scope

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

2.2.1 Aspects of the Local Plan to be assessed and how

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

1 Introduction

2 Vision and Objectives

3 Sustainable development

4 Design

5 Land uses

6 Transport

7 Environment and Utilities

8 Places

9 Delivery

The intention will be to ensure that the process is iterative with regular feedback occurring between the plan-makers and the IIA team, as options are developed.

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

However, it is expected that a more detailed assessment of the policies, allocations and alternatives will be undertaken using an assessment matrix.

Assessment of Alternatives

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

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

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

The draft IIA Framework for consultation is presented in Section 6 of this report. The purpose of the assessment will be to determine the sustainability strengths and weaknesses of each option, such that this information can be used by the plan-makers to inform their decision to select the preferred options. It is proposed that for the strategic elements a matrix will be used for this assessment that enables the options to be easily compared.

The types of alternative options to be reviewed are currently anticipated to include:

- Strategic Spatial Strategy Options;
- Possible strategic policy directions; and
- Possible site allocations.

2.3 Temporal Scope

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

2.4 Technical Scope

2.4.1 SEA

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

- Biodiversity;
- Population;
- Human health;
- Fauna and flora;
- Soil;
- Water;
- Air;

- Climatic factors;
- Material assets;
- Cultural heritage including architectural and archaeological heritage; and
- Landscape.

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

2.4.2 HIA

The NHS London Health Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool Framework (January 2013)[4] guidance lists the following health determinants, to be considered as a part of an assessment into health impacts:

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

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

Within the assessment process, the HIA will be integrated throughout the IIA Framework (see section 6), with health, and impact on health, being considered under all relevant objectives. Most notably, however, the 'human health' topic of SEA will be expanded upon, to ensure that relevant baseline data, key sustainability issues and opportunities, objectives and mitigation is identified. Section 3 provides further information on how the HIA process will integrate with the IIA process.

[4] http://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Rapid-HIA-Tool-Jan-2013-Final.pdf

2.4.3 EqIA

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

This IIA Scoping Report, which integrates the requirements of EqIA, sets out the matters that have been identified as relevant for consideration in the EqIA. The EqIA will seek to identify those groups that may be affected by the proposals, to analyse what the equality impacts are, and what measures are to be applied to policy to minimise or eliminate the adverse impacts. Within the assessment process, the EqIA will be integrated throughout the IIA Framework (see section 6), with equalities issues being considered under all relevant objectives. Section 3 provides further information on how the HIA process will integrate with the IIA process.

2.4.4 HRA

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

Table 2-1 Statutory sites of international nature importance in proximity to the OPDC area

Site Name	Designation	Approximate direction and distance from the site
Richmond Park	SAC	6.9km, south of site
Wimbledon Common	SAC	8km, south of site

Consultation Question (a)

Do you have any further suggestions regarding the scope of the IIA and its proposed appraisal of the Local Plan?

3 The IIA Process

3.1 Stages in the IIA Process

The Office of the Deputy Prime Minister's (OPDM) Practical Guide[5] as well as NPPG (March 2014), provide guidance on conducting an SA. This will be followed for the purposes of the IIA. The five main stages in conducting an SA are defined as:

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

Table 3-1 presents the key stages in the SA process. This Scoping Report documents the findings of Stage A. The table also demonstrates how each of the SA (including SEA), HIA, EqIA and HRA assessment processes and stages are linked to each other, as well as to the preparation and development of the Local Plan.

[5] ODPM (2005) A Practical Guide to the SEA Directive

Table 3-1 Stages in the IIA Process

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

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment
		Consult on the scope of the SA including HIA, EqIA and HRA	*Consultation as part of SA Scoping Report consultation including consultation with Natural England*	*Consultation as part of SA Scoping Report consultation.*	*Consultation as part of SA Scoping Report consultation.*
	Review of scoping consultation responses and preparation of Final Scoping Report to inform next stage.				
Generating options for the strategy and implementation plan to resolve these challenges; appraising the options and predicting their effects (Regulation 18 Local Plan)	**B1/B2. Developing, refining and appraising strategic alternatives**	Assess objectives against the Assessment Framework		*HIA effects evaluated through SA Framework – including mitigation*	*EqIA effects evaluated through SA Framework*
		Develop, refine and appraise strategic options	*Consider HRA implications of the options.*		Screening exercise of proposed strategic options
		Evaluate/select preferred options			
	C. Prepare Initial SA Report				
Consultation on Local Plan Issues and Options (Regulation 18)	Consultation on Initial SA Report				
	Review of consultation responses and necessary actions to inform next stage				
Selecting preferred options for the strategy and	**B3/B4. Assessing the effects of the**	Predict and assess effects of options taken forward		*HIA effects evaluated through SA Framework – including mitigation*	*EqIA effects evaluated through SA Framework*

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment
implementation plan and deciding priorities	**Local Plan Preferred Options**	Proposed mitigation measures			
		Propose monitoring programme	*Monitoring as part of SA*	*Monitoring as part of SA*	*Monitoring as part of SA*
Production of the Draft Local Plan	**C. Prepare SA Report**		HRA Screening of draft Local Plan. HRA Screening Report produced separately and sent to Natural England for agreement of findings.	*HIA fully documented in SA Report*	*EqIA fully documented in SA Report*
Consultation of Draft Local Plan (Regulation 19)	**D. Consultation on the SA Report**		As above.	*HIA Consultation included in SA Report consultation*	*EqIA Consultation included in SA Report consultation*
Production of Final Local Plan	**D. Prepare a supplementary or revised SA Report if necessary**	Assess significant changes	Prepare updated HRA Report following Natural England comments (if necessary).	*HIA assessment of significant changes undertaken as part of SA and options around mitigation or reduction of effect identified*	*EqIA assessment of significant changes undertaken as part of SA*
		Prepare supplementary or revised SA Report			
Adoption of Local Plan	**D. SA Statement**				

4 Review of Relevant Plans, Programmes and Environmental Objectives

4.1 Introduction

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

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

> *'an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmers' (Annex 1 (a)).*
>
> *'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation' (Annex 1 (e))*

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

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

The review included documents prepared at international, national, regional and local scale. A brief summary of the documents reviewed and the main findings are summarised in **Tables 4-1 and 4-2**. Further details are presented in **Appendix B**.

Table 4-1 Review of Plans, Policies and Programmes

Plan, Policy or Programme	Directly Relevant Process
International/ European	
European Directive 2001/42/EC (SEA Directive)	SEA
European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats	HRA, SEA
European Directive: Environmental Noise Directive 2002/49/EC	SEA, HIA, EqIA
EU Directive on Ambient Air Quality and Management 96/62/EC	SEA, HIA, EqIA
Water Framework Directive 2000/60/EC	SEA

Plan, Policy or Programme	Directly Relevant Process
Waste Framework Directive 2006/12/EC	SEA
Urban Waste Water Treatment Directive 91/271/EEC	SEA, HIA
Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC	SEA
Health for Growth 2014-2020, European Commission, 2011	HIA, SEA
European Convention on the Protection of the Archaeological Heritage (revised), 1992	SEA
National	
Greater London Authority Act 1999	HIA, EqIA
Equality Act 2010	HIA, EqIA
Wildlife and Countryside Act 1981	HRA
Flood and Water Management Act 2010	SEA, HIA
Energy Act 2013	SEA
Climate Change Act 2008	SEA, HIA, EqIA
Planning (Listed Building and Conservation Areas) Act 1990	SEA
Ancient Monuments and Archaeological Areas Act 1979	SEA
UK Climate Change Programme 2006	SEA, HIA, EqIA
National Planning Policy Framework, Department for Communities and Local Government, March 2012	SEA, HIA, EqIA
GOL Circular 1/2000: Strategic Planning in London, Government Office for London, June 2000	
Planning Policy for Traveller Sites, Department for Communities and Local Government, March 2012	SEA, EqIA
The UK Government Sustainable Development Strategy, HM Government, 2005	SEA, HIA, EqIA
The UK Low Carbon Transition Plan, HM Government, July 2009	SEA
The Carbon Plan, HM Government, December 2011	SEA
UK Renewable Energy Strategy, HM Government, 2009	SEA
Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011	SEA, HIA

Plan, Policy or Programme	Directly Relevant Process
UK Post-2010 Biodiversity Framework, Joint Nature Conservation Committee and Department for Environment, Food and Rural Affairs, 2012	SEA
White Paper: Healthy Lives, Healthy People: our strategy for Public Health in England, Department for Health, June 2011	SEA, HIA, EqIA
UK Air Quality Strategy, Department for Environment, Food and Rural Affairs, 2011	SEA, HIA, EqIA
Noise Policy Statement for England, Department for Environment, Food and Rural Affairs, March 2010	SEA, HIA, EqIA
Policy statement: Planning for schools development, Department for Communities and Local Government, August 2011	SEA, EqIA
Regional / London	
The London Plan: Spatial Development Strategy for Greater London, Greater London Authority, July 2011	SEA, HIA, EqIA
Revised Early Minor Alterations to the London Plan, Greater London Authority, October 2013	SEA, HIA, EqIA
Further Alterations to the London Plan, Greater London Authority, March 2015	SEA, HIA, EqIA
Draft Minor Alterations to the London Plan 2015 – Housing Standards, and Parking Standards, Greater London Authority, May 2015	SEA, HIA, EqIA
Land for Industry and Transport Supplementary Planning Guidance, Greater London Authority, September 2012	SEA, HIA, EqIA
Green Infrastructure and Open Environments: The All London Green Grid, Supplementary Planning Guidance, Greater London Authority, March 2012	SEA, HIA, EqIA
London Plan Supplementary Planning Guidance on Housing, Greater London Authority, November 2012	SEA, HIA, EqIA
London Plan Supplementary Planning Guidance, Sustainable Design and Construction, Greater London Authority, April 2014	SEA, HIA, EqIA
Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance, Greater London Authority, 2012	SEA, HIA, EqIA
Green Infrastructure and Open Environments: London's Foundations: Protecting the geodiversity of the capital: Supplementary Planning Guidance, Greater London Authority and London Geodiversity Partnership, March 2012	SEA
Securing London's Water Future, Greater London Authority, October 2011	SEA, HIA
The Mayor's Food Strategy: Healthy and Sustainable Food for London, London Development Agency, May 2006	SEA, HIA, EqIA
Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy, Greater London Authority, October 2011	SEA, HIA
Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaption Strategy, Greater London Authority, October 2011	SEA, HIA
Cultural Metropolis: The Mayor's Culture Strategy, Greater London Authority, November 2010 and Achievements and Next Steps, Greater	SEA, HIA, EqIA

Plan, Policy or Programme	Directly Relevant Process
London Authority, Greater London Authority, 2014	
The London Health Inequalities Strategy, Greater London Authority, April 2010	SEA, HIA, EqIA
Planning for Equality and Diversity in London: Supplementary Planning Guidance to the London Plan, Greater London Authority, October 2007	EqIA
River Basin Management Plan. Thames River Basin District, Environment Agency, December 2009	SEA
The Mayor's Economic Development Strategy for London, Greater London Authority, May 2010	SEA, EqIA
Mayor's Biodiversity Strategy: Connecting with London's Nature, Greater London Authority, July 2002	SEA, HRA, HIA
Improving Londoners Access to Nature: London Plan Implementation Report, Greater London Authority, February 2008	SEA, HIA
London Biodiversity Action Plan, London Biodiversity Partnership, 2001	SEA, HIA
Clearing the Air: The Mayor's Air Quality Strategy, Greater London Authority, December 2010	SEA, HIA
Sounder City: The Mayor's Ambient Noise Strategy, Greater London Authority, March 2004	SEA, HIA
London View Management Framework Supplementary Planning Guidance, Greater London Authority, March 2012	SEA
Mayor's Transport Strategy, Greater London Authority, May 2010	SEA, HIA, EqIA
The Mayor's Equality Framework: Equal Life Chance for All, Greater London Authority, 2009	EqIA
West London	
West London Joint Waste Plan to 2031: Proposed Submission Plan, London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond Upon Thames, February 2014 and Proposed Main Modifications, December 2014	SEA, HIA
West London Sub Regional Transport Plan, Transport for London, 2014 update	EqIA, SEA, HIA
Local	
Old Oak and Park Royal draft Opportunity Area Planning Framework, Greater London Authority, February 2015	SEA, HIA, EqIA
Brent	
London Borough of Brent Local Development Framework, Core Strategy, Brent Council, July 2010	SEA
Brent Parks Strategy 2010-2015, Brent Council, publication date unknown	SEA, HIA, EqIA
Food for Thought: A Food Growing and Allotments Strategy for the London Borough of Brent and Action Plan 2014/16, Brent Council, publication date	SEA, HIA, EqIA

Plan, Policy or Programme	Directly Relevant Process
unknown	
Draft Community Safety Strategy 2014-17, Safer Brent Partnership, publication date unknown	SEA, HIA, EqIA
Brent Equality Strategy 2015-19, Brent Council, April 2015	EqIA
Brent Health and Wellbeing Strategy 2014-17, Brent Council and NHS Brent, publication date unknown	SEA, HIA, EqIA
Cultural Strategy for Brent 2010-15, Brent Council, publication date unknown	EqIA
A Regeneration Strategy for Brent 2010-2030, Brent Council, publication date unknown	SEA, HIA, EqIA
A Plan for Children and Families in Brent 2012-15, Brent Council, publication date unknown	EqIA
Ealing	
The Development Strategy 2026: Ealing Core Strategy, Ealing Council, April 2012	SEA
Sustainable Community Strategy 2006-2016 Ealing Council, Refresh July 2011	SEA, HIA, EqIA
Ealing Quality of Life for Older People 2006-2016, Ealing Council, publication date unknown	HIA, EqIA
Arts and Cultural Strategy 2013-2018, Ealing Council, publication date unknown	SEA, EqIA
Ealing Green Space Strategy 2012-2017, Ealing Council, November 2012	EqIA, HIA, SEA
Park Royal Southern Gateway Position Statement, Final Draft, London Borough of Ealing, April 2008	SEA
Hammersmith and Fulham	
Hammersmith and Fulham Core Strategy, Hammersmith and Fulham Council, October 2011	SEA
Hammersmith and Fulham Housing Strategy: Delivering the change we need in housing, Hammersmith and Fulham Council, May 2015	EqIA, HIA, SEA
Hammersmith and Fulham Health and Wellbeing Strategy 2013-15, Hammersmith and Fulham Council, publication date unknown	EqIA, HIA, SEA
Parks and Open Spaces Strategy 2008-2018, Hammersmith and Fulham Council, July 2008	EqIA, HIA, SEA
Hammersmith and Fulham CSPAN Physical Activity Strategy 2011-2016, Hammersmith and Fulham Council, November 2011	EqIA, HIA, SEA
Updated Surface Water Management Plan 2015, Hammersmith and Fulham Council, April 2015	SEA, HIA
Contaminated Land Strategy, Hammersmith and Fulham Council, 2001	SEA

4.2 Key Results from the Review

Environmental, social and economic objectives and issues identified in the review of plans, programmes and environmental protection objectives (PPPs) of relevance to the IIA were used to generate a series of common themes. **Appendix B** presents a summary of how the identification of common themes relates to each of the PPPs reviewed. How these themes relate to the relevant assessment processes is presented in **Table 4-2**. The results of this assessment have been used to inform the development of the draft IIA Framework. How the resulting draft Objectives relate to the identified themes is also shown in **Table 4-2**.

Table 4-2 Review of Plans, Policies and Programmes

Common theme	Relevance to SEA, HIA, EqIA and HRA	Relevance to draft IIA Objective
Environmental		
Optimise the use of land through increasing the density of development	SEA: Soil, Material Assets, Population	2, 3, 4, 7, 17, 18
Promote sustainable design and mitigate and adapt to climate change	SEA: Human Health, Population, Climatic Factors, Material Assets; HIA; EqIA	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 15
Promote and protect the water environment including issues such as quality and resource use as well as reducing flood risk	SEA: Human Health, Population, Climatic Factors, Water, Material Assets; HIA; EqIA	3, 6, 7, 8, 9, 10, 15
Reduce greenhouse gas emissions, increase energy efficiency and promote the use of renewable energy and renewable technologies in appropriate locations	SEA: Climatic Factors, Air, Material Assets, Population	4, 6, 7, 8
Promote sensitive waste management	SEA: Material Assets, Climatic Factors, Population, Human Health, Soil, Landscape; HIA, EqIA	3, 7, 8, 9, 10, 11, 15
Protect and enhance the historic environment and recognise and appreciate landmarks and townscapes	SEA: Material Assets, Cultural Heritage, Population, Landscape	1, 2, 3, 5, 12, 13, 18
Conserve and enhance biodiversity as an integral part of economic, social and environmental development	HRA; SEA: Biodiversity, Flora, Fauna, Population, Material Assets, Climatic Factors, Soil, Water	1, 6, 9, 10, 11, 15, 18
Achieve more effective geoconservation and improve soil quality	SEA: Soil, Climatic Factors, Human Health, Water, Landscape; HIA	2, 3, 6, 7, 8, 9, 10, 15
Improve air quality	SEA: Air, Climatic Factors, Human Health, Population, Material Assets; HIA, EqIA	4, 7, 8, 10, 22, 25, 17, 18
Minimise the adverse impacts of noise on people living and working in, and visiting the area	SEA: Population, Human Health, Material Assets; HIA; EqIA	1, 4, 5, 11, 15, 18

Common theme	Relevance to SEA, HIA, EqIA and HRA	Relevance to draft IIA Objective
Social		
Improve health and well-being and promote greater levels of physical activity	SEA: Human Health, Population, Landscape; HIA; EqIA	1, 4, 7, 11, 13, 14, 15, 16, 17
To create an equal society which recognises people's different needs, situations and goals, and removes the barriers that limit what people can do and be	SEA: Human Health, Population; HIA; EqIA	13, 14, 15, 16, 17
Maximise the contribution that the arts, culture and heritage can make to the community	SEA: Population, Material Assets, Cultural Heritage; HIA; EqIA	1, 12, 13
The need to ensure that new housing development meets local needs (for all sections of society)	SEA: Population, Human Health, Material Assets; HIA; EqIA	1, 5, 13, 14, 15
Promote more sustainable transport choices and to improve accessibility	SEA: Population, Human Health, Material Assets, Air, Noise, Climatic Factors; HIA; EqIA	1, 2, 4, 7, 11, 15, 17
Recognise the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life	SEA: Population, Human Health, Landscape, Material Assets; HIA; EqIA	1, 6, 12, 13, 14, 15
Improve educational attainment and training opportunities	SEA: Population, Human Health; HIA; EqIA	13, 14, 15, 16, 17, 18
Reduce crime and fear of crime	SEA: Population, Human Health; HIA; EqIA	1, 4, 13, 14, 15, 16, 17, 18
Economic		
Promote sustainable economic development and a range of employment opportunities	SEA: Population, Human Health, Material Assets; HIA; EqIA	16, 17, 18

Consultation Question (b)

Are there any additional PPPs that should be considered for review?

Consultation Question (c)

Are there any additional themes that could be drawn out of the review of PPPs?

5 The Sustainability Baseline and Key Sustainability Issues

5.1 Introduction

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

Box 2: SEA Directive Requirements for Baseline Data Collation

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

5.2 Methodology

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

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

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

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

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

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

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

Appendix C also provides a summary of how the identified key sustainability issues and opportunities might be addressed in the Local Plan. Sustainability issues and opportunities identified from the baseline review are summarised in **Table 5-1**.

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

- Biodiversity, Flora and Fauna;
- Soils and Geology;
- Cultural Heritage;
- Landscape;
- Housing; and
- Transportation.

5.3 Key Sustainability Issues and Opportunities

Table 5-1 presents a summary of the key sustainability issues and opportunities for OPDC.

Table 5-1 Key Sustainability Issues and Opportunities

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Population	▪ The current population of OPDC is considered to be low, consisting of 4,491 persons in 1,898 households. The dominant age group is 25 – 64 years old. Compared to the national average (16.3%), the area has a significantly lower ageing population percentage (aged 65+) of 6.1%. OPDC have been charged with delivering at least 24,000 new homes within the study area, which will see the population rise significantly compared to its current level. ▪ After White British (21.6%), there are significant populations of Other White (18.6%) and Black (African/Caribbean and Other total 24%)). ▪ There is an Irish Traveller community living within the study area. ▪ A large transitory construction workforce could also have negative effects on the community.	▪ The influx of future population needs careful management to reduce inequalities throughout the area and adjoining boroughs. The Local Plan could seek to model the unknown future population, drawing on lessons learnt from other major development projects such as King's Cross. ▪ Careful consideration should be given to the wider population trend of an ageing population as well ensuring an attractive area for young adults and those who may be looking to raise a family. This provides opportunities for Lifetime Neighbourhoods and intergenerational mixed housing. ▪ The provision of accessible services should meet existing and new local population growth needs. ▪ The provision of social infrastructure needs for healthcare and key services due to a large future population needs to be prioritised, exploration of developing sites before threshold population numbers should be explored. ▪ The Local Plan should consider the potential for the withdrawal of Permitted Development Rights for the conversion of offices to residential use, to prevent the reduction in community cohesion and access to facilities.	SEA: Population, Human Health HIA EqIA	1, 2, 4, 5, 13, 14, 15, 16
Education and Qualifications	▪ The percentage of people with no qualifications in 2011 was 16%. The percentage of people with NVQ Level 4 qualification or above was 36.5% compared with 44.7% for Inner London and 27.4% for England. ▪ There is a gap in education facilities within the area.	▪ Positive trends in the following should be expected: ○ Reducing the number of residents without a qualification; ○ Ensuring new population numbers have adequate educational facilities; ○ Ensuring that schools and other education facilities outside the OPDC area aren't adversely affected. ▪ Opportunities to incorporate work based learning/training should	SEA: Population, Human Health, Material Assets HIA	13, 14, 15, 16

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
		be incorporated into the Local Plan where possible. These opportunities could also be linked to the colleges and universities within the surrounding area.	EqIA	
Health	▪ 15.1% of the area's population stated they have limiting long-term illness or disability, higher than the London average. ▪ Life expectancy for men is 2 years lower than the national average. ▪ During the period 2010/11 and 2012/13, 11.8% of children at reception year were considered obese, with an additional 23.6% carrying excess weight. A further 23.6% of children in year 6 were identified as obese, with the same figure for London recorded at 22.5%. ▪ There are pockets of health deprivation within the study area along with a very poor living environment. ▪ Due to its industrial nature and history, there is a lack of primary care facilities within the OPDC boundaries, with the exception of Middlesex Hospital. ▪ There is currently poor accessibility to district and Local Park sized open space/green infrastructure/play space.	▪ The rise of people who are in good health across the area and the continued reduction of those in poor health should be supported. ▪ The scale of development means that new care facilities need to be delivered, not as standalone but as part of a combined approach to social infrastructure provision. ▪ All new high streets need to obtain 10 out of 10 in the Healthy High Streets measure. ▪ Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has- including both psychological and physical effects. ▪ Incoming population – there is an opportunity for the health of the local community to be built in to the Local Plan principles from the very beginning. This may include building in street networks, designed to support exercise and so that children can play independently; designing areas of multi-generational play; building in creativity, art, intrigue, surprise – to create a sense of place and a high quality environment; and designing housing and workspace that supports health and well-being. ▪ The Local Plan should seek to ensure that accessibility to open spaces, including green spaces, as this can have benefits for both physical and mental health. ▪ Design measures should be included within the Local Plan, that encourage a reduction in the need to travel by private car – this could include the provision of a mix of land uses; and the design of well-connected street networks at the human scale.	SEA: Population, Human Health, Material Assets HIA EqIA	1, 4, 7, 11, 13, 14, 15, 16

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Crime	▪ The area is one of the more deprived areas of the country in relation to crime levels. Car theft is average or above average in the centre of the OPDC. Violence against persons is alo high or above average in the majority of the OPDC area.	▪ Given the proposed retention of Strategic Industrial Location (SIL) in Park Royal, the Local Plan should seek to ensure that the design of new development improves the safety and perceived safety of the community and their property. ▪ Secured by Design principles should be reflected in new development within the OPDC area alongside considering wider place-making aspirations.	SEA: Population, Human Health HIA EqIA	13, 14
Water	▪ Both the River Brent and Grand Union Canal are characterised by poor chemical and biological water quality. ▪ The western boundary of the OPDC area is at risk of fluvial flooding from the River Brent. ▪ There is an increased threat from surface water flooding due to increased precipitation rates generated by climate change. ▪ There are risks associated with flooding and the mobilisation of contaminants linked to contaminated land within the area. ▪ Counters Creek Combined Sewer is nearly at capacity. ▪ In the past 20 years, Thames Water has seen a 15% increase in water usage throughout London. This is equivalent to an increase of 10 litres per person per decade.	▪ The risk of flooding and the mobilisation of contaminants should be minimised through measures such as a site-wide drainage strategy and increased awareness. ▪ The Local Plan should seek to ensure that there is sufficient infrastructural capacity for new development, ahead of occupation. ▪ The Local Plan should seek to encourage increased efficiency in the of water through design measures. ▪ The Local Plan should seek to coordinate the implementation of flood mitigation measures with other public realm requirements including utilities and smart infrastructure.	SEA: Water, Population, Human Health, Soil, Climatic Factors, Landscape HIA EqIA	3, 6, 7, 9, 10, 15
Soils and Geology	▪ There are no areas of Regionally Important Geodiversity Sites (RIGS) within the area. ▪ The area's heavy manufacturing history has left a legacy of land contamination which may give rise to number of development issues.	▪ The Local Plan should seek to protect the area's soils from contamination and continue to remediate areas that were impacted in the past. ▪ The Local Plan should seek to support the decontamination of soil within the local area.	SEA: Soil, Biodiversity, Human Health, Water HIA	2, 3, 9, 10, 15
Air Quality	▪ The principal threat to clean air in London comes from road traffic. There are areas of high NO_2 concentrations in the along the strategic highway network. Poor air quality can damage people's health and quality of life. It can pose	▪ The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised. ▪ The Local Plan should seek to ensure that any benefits	SEA: Air, Climatic Factors, Material	4, 7, 11, 15

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	particular problems for vulnerable groups such as the elderly, young children and people suffering from respiratory diseases. ▪ Air Quality Management Areas (AQMAs) are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. The whole of the OPDC area is considered to be within an AQMA for levels of nitrogen dioxide (NO_2)[6] and particulate matter smaller than 10 micrometres (PM_{10})[7]. Each of the three boroughs have identified the same exceedances and types of pollutants. New types of development in the area may lead to an improvement in local air quality.	generated to local air quality from a change in economic land use are not counteracted by the increase in population and development overall.	Assets, Human Health HIA	

[6] Nitrogen dioxide (NO_2) is one of a group of gases called nitrogen oxides. Road transport is estimated to be responsible for about 50% of total emissions of nitrogen oxides, which means that nitrogen dioxide levels are highest close to busy roads and in large urban areas. Gas boilers in buildings are also a source of nitrogen oxides. There is good evidence that nitrogen is harmful to health. The most common outcomes are respiratory symptoms such as shortness of breath and cough. Nitrogen dioxide inflames the lining of the lung and reduces immunity to lung infections such as bronchitis. Studies also suggest that the health effects are more pronounced in people with asthma compared to healthy individuals. http://www.londonair.org.uk/LondonAir/guide/WhatIsNO2.aspx

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

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Climate Change	▪ Energy consumption within the area was similar to the London average in 2009-11.	▪ Greenhouse gas emissions should be reduced at the rate, and exceeding where possible, required to meet local and national targets, helping to mitigate the impacts of climate change. ▪ The reduction of energy use in the area should be encouraged both by existing developments and future ones. This might include the development of a site-wide decentralised energy generation and storage network and to create a closed loop system. ▪ A high proportion of energy generated should be from low, zero or negative carbon energy sources.	SEA: Air, Climatic Factors, Material Assets, Human Health HIA	4, 6, 7, 11, 15
Biodiversity, Flora and Fauna	▪ There are no designated sites[8] within the OPDC boundary and no nationally/internationally designated sites (Sites of Special Scientific Interest (SSSI)/SPA/SAC/Ramsar) within 2km. ▪ Richmond Park SAC is 6.9km to the south of the OPDC area and Wimbledon Common SAC is 8km to the south. ▪ Wormwood Scrubs is a Local Nature Reserve and possesses a variety of wildlife. It is popular with birdwatchers and supports woodland, grassland and is home to common lizards and at least 20 species of butterfly. ▪ The Grand Union Canal and adjacent area in Old Oak South	▪ The Local Plan should seek to ensure that impacts to designations, species and habitats is minimised as well as seeking to encourage increased biodiversity within the area. ▪ Opportunities should be sought to ensure that protected species have favourable conservation status and are thriving. ▪ Opportunities should be sought to promote habitat connectivity both within the area and outside of it. The layout of connected habitats and a wider green infrastructure scheme of walking and cycling routes could form the basis for the spatial planning of the OPDC area. ▪ Wormwood Scrubs Local Nature Reserve's and the Grand	SEA: Biodiversity, Flora, Fauna, Population, Soil, Water, Air, Climatic Factors, Landscape HIA	1, 9, 10, 11, 12, 15, 18

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

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	is a nature conservation area of Metropolitan Importance. ▪ There is potential for impacts to protected species as a result of an increasing population and the resulting development required to meet population needs.	Union Canal's habitat and species should be protected and enhanced.		
Cultural Heritage assets	▪ There are a number of undeclared heritage assets in the area. ▪ There is the potential for undiscovered archaeological remains to exist throughout the area. ▪ There is one listed asset within the OPDC area – Brent Viaduct. ▪ Within the boundary there are two Conservation Areas, these include: Old Oak Lane; and along the Grand Union Canal. Adjacent to the study area are the St. Mary's, Kensal Green Cemetery (Grade I registered Park and Garden of special historic interest which contains the Grade I listed Anglican Chapel, twelve Grade II* listed buildings or monuments and 147 Grade II listed buildings or monuments.). Within the surrounding area, the following conservation areas may be affected by development within the OPDC area: ▪ Harlseden; ▪ St. Mary's; ▪ Old Oak and Wormholt; ▪ Hangerhill Garden Estate; and ▪ Hagerhill (Hay Mills) Estate. Other notable listed buildings whose setting could be affected by development in the Opportunity Area include the Grade II* listed gatehouse and chapel at Wormwood Scrubs Prison, the Church	▪ The Local Plan should ensure that both designated and undesignated or undiscovered heritage assets and their settings, and archaeological remains are protected and, where appropriate, enhanced. ▪ Cultural heritage assets throughout the OPDC area could provide an opportunity for tourism and leisure. Opportunities should be sought to safeguard and promote awareness of the important heritage assets and their settings within the OPDC area – particularly in relation to the area's role in industry and during the interwar period. ▪ Statutory sites outside the OPDC boundary also need to be protected and safeguarded, particularly in terms of their setting. Cross-boundary issues with respect to heritage assets and views need to be addressed.	SEA: Population, Material Assets, Cultural Heritage, Landscape	1, 5, 12, 13, 18

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	of All Souls Harlesden (also Grade II*), and thirteen Grade II listed buildings within 250m of the boundary. Further afield are Statutory Listed buildings, the closest being Kenmont Primary School and Park Royal Underground Station. ▪ The Old Oak Common and Park Royal areas have a disparate assortment of railway and industrial heritage that play a valuable role in informing the evolving character of the area. Specific collections of non-designated heritage assets are located along the east of Scrubs Lane, the interwar Rolls Royce works and Acava Studios on Hythe Road. ▪ A significant number of the heritage assets listed above are on English Heritage's Heritage at Risk Register. These include Kensal Green Cemetery, as well as 35 monuments within it, including the Anglican Chapel. Twyford Abbey to the west of the opportunity area is also a long standing Heritage at Risk case.			
Landscape and Townscape	▪ The OPDC area comprises a largely industrial townscape with its edges influenced by more residential areas and strategic roads. Railway infrastructure is a dominant feature across the site. ▪ Along the south-eastern boundary lies Wormwood Scrubs Park which is grassland and some woodland. The eastern boundary is Kensal Green Cemetery. ▪ While there are substantial areas of green space on the periphery of the plan area, the industrial nature of the area means that most parts have a severe open space deficiency.	▪ Opportunities could be sought to maintain the important heritage of Old Oak in particular and OPDC more widely. ▪ Access to and awareness of the unique aspects of the area should be improved. ▪ The development of the area should enhance adjoining landscapes situated on the OPDC boundary and *vice versa*. ▪ Integration with the All London Green Grid Area SPG Frameworks is an important consideration. ▪ It is essential that townscape character and quality is maintained/enhanced through high quality design, careful siting, and incorporation of soft landscaping.	SEA: Landscape, Material Assets, Cultural Heritage	1, 2, 5, 6, 8, 10, 11, 12, 13, 14, 15, 18
Waste	▪ Recycling rates are higher for Ealing compared to Brent, Hammersmith & Fulham and London as a whole though they	▪ Opportunities should be sought to continue the reduction in	SEA: Population,	2, 3, 6, 7, 8, 9,

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	have increased between 2010 and 2012. There is currently no data available on the municipal waste sent to landfill in the area. ▪ There are several waste sites within the area: European Metal Recycling; Powerday; Capital Waste Ltd; UK Tyre Exporters; O'Donovan's Waste Disposal Ltd.	waste being sent to landfill. ▪ London Waste and Recycling Board – there is an opportunity for the OPDC area to become an exemplar centre for the creation of an 'integrated circular economy'. This could include the creation, use and recycling of products locally, including the potential for the growing of local food through the use of vertical farms. ▪ The Local Plan should seek to increase rates of recycling, reuse and composting of waste, which would otherwise be sent to landfill. ▪ The Local Plan should explore the delivery of innovative waste transport and management techniques supported by smart city technology. ▪ Due to potential land use changes, there's a need to consider waste apportionment with the neighbouring boroughs and where waste will be processed if these uses are displaced by new development.	Human Health Material Assets, Soil, Air, Landscape, Climatic Factors HIA EqIA	10, 11, 15, 18
Transportation	▪ Old Oak and Park Royal are poorly connected to the wider road network. ▪ Both Old Oak and Park Royal generate significant numbers of road freight movements. ▪ Access to and from Old Oak station is currently poor. ▪ There are a number of 'hard edges' along the boundary of the OPDC area, which creates poor legibility for walkers and cyclists. ▪ Roads in Park Royal are congested.	▪ Opportunities should be sought to maximise modal shift towards sustainable transport modes, in particular, walking and cycling. ▪ Opportunities should be sought that maximises rail transport of both goods and people. ▪ The Local Plan should seek to ensure that improvements in the area do not lead to increase pollution/traffic etc., elsewhere across London. ▪ Opportunities should be sought that maximises opportunity for green networks and improves connectivity for people across the area. ▪ Green Infrastructure – there is an opportunity to create green infrastructure which facilitates live/work/play/travel through as	SEA: Population, Human Health, Air, Climatic Factors, Material Assets HIA EqIA	1, 4, 6, 7, 11, 13, 14, 15, 17, 18

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
		well as fast and meandering routes. However, the Local Plan should manage the spread of routes across the OPDC area, so that certain routes do not become congested. ▪ The Grand Union Canal presents a great opportunity for both water travel and freight movements as well as footpaths and should be considered a strategic transport link within the area. However, capacity issues should be taken into consideration. ▪ There is an opportunity to significantly improve accessibility to and throughout the site, including the creation of legible routes and reducing 'hard edges'. The Local Plan should consider alternatives to the use of on-street parking and servicing at the fronts of buildings, as these can have a negative effect on the 'street atmosphere'. ▪ Opportunities should be sought to reduce motorised transport and increase the use of greener, smarter, more sustainable modes of transport. ▪ Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network.		
Noise	▪ Road and rail noise are significant contributors to the ambient noise environment, particularly around the town centre and main distributor roads.	▪ The Local Plan should seek to minimise the effects from noise pollution on the existing and incoming population, and ensure that these effects do not disproportionately affect any particular socio-economic or equalities group.	SEA: Human Health, Population HIA EqIA	1, 2, 4, 11, 12, 15, 18
Local Economy	▪ The area is characterised by some 2,000 businesses – the majority (75%) of these are micro in scale. The OPDC area suffers from employment deprivation. There's a strong	▪ Employment and training - There is an opportunity for the Local Plan to specify that incoming employment opportunities are to be directed towards local people in the existing and surrounding	SEA: Population, Human	1, 2, 3, 15, 16, 17, 18

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	element of warehousing and other light to heavy industrial uses. A large proportion of residents within the area work locally. The displacement of existing businesses in the area could lead to a negative effect on the existing community. ▪ Affordable workspace – much of the available workspace is affordable at present, due to its poor quality. There is also an issue relating to density in this area – warehousing uses are low employment generators. ▪ 18.6% of the population have been claiming job seekers allowance for more than a year. ▪ There are inequalities between between men and women. ▪ Infrastructure/Utilities – a key issue for the area is how infrastructure/utilities will be improved to accommodate the new development. In particular, broadband capacity is very poor at present within Park Royal. Also transport links need significant improvement. ▪ Town centres – there is a potential issue that the development of offices and retail facilities within the OPDC area would destroy neighbouring town centres, including Ealing town centre.	communities. This combines with an opportunity to upskill the local workforce, the majority of whom may currently be in lower-skilled jobs in the local area. ▪ The Local Plan should seek to provide employment and business opportunities that meet the current and future needs of the local economy, within the context of the neighbouring communities. ▪ The Local Plan should seek to ensure that the appropriate infrastructure capacity is developed and planned comprehensively, ahead of the occupation of new development. ▪ Incoming retail should be developed in small clusters. This could help to reduce the impact on other town centres. A fine balance between place-making, providing enough facilities, and not destroying external town centres, needs to be sought. Improved connectivity from the OPDC area to the town centres could be beneficial in this respect. Harlesden town centre would be walkable from the OPDC area. ▪ Healthy New Towns – NHS England are seeking to promote this initiative in the OPDC area. This is based on health-led employment in the centre, for clean, green and healthy technology businesses. This may include research companies etc. ▪ North Acton is seeking to attract a university campus in the OPDC area, which would buffer the industrial area further north, with an area of student housing further south. Anecdotal evidence suggests that the campus may be associated with Imperial College. ▪ Affordable workspace – there is potential to create flexible/shared office environments, whereby users can rent desk-space without the need for a formal lease agreement for	Health, Material Assets HIA EqIA	

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
		an entire office. The Local Plan should also seek to manage the affordability of newly generated economic opportunities. ▪ The land uses in the OPDC area are likely to experience a wholesale change from the existing situation. This could provide an opportunity to reduce disparities across the area.		
Deprivation and Living Environment	▪ The area lies within other deprived areas of Brent, Ealing and Hammersmith & Fulham and falls within the most deprived areas for living environments.	▪ Deprivation is a very complex issue and a number of different issues will need to be addressed for noticeable improvements to be realised. Enhancements in the OPDC area that deliver employment opportunities, high quality new housing, improved public realm, and access to nature, would all provide benefits towards reducing deprivation.	SEA: Population, Human Health HIA EqIA	1, 4, 5, 6, 8, 9, 11, 12, 13, 14, 15, 16, 17
Housing	▪ 38.3% of the population in the OPDC area rent accomodation from private landlords, which is a rate that is signficantly higher than adjoining boroughs. ▪ 29.5% of households are owner-occupiers, compared to 42.9% in Brent, 34% in Hammersmith & Fulham and 51.1.% in Ealing. ▪ There is a shortage in the amount of affordable housing provided and there is a continuing need for affordable housing in the area and in London overall. ▪ There is a Traveller site next to Old Oak on Backley Road, which is linear against the railway line and a metal refinery. ▪ 9% of households in the plan area are lone parent families and over 90% of these parents are women. Lone parents experience some of the greatest levels of economic and housing need, their household incomes are only about a third of the average income. They are more than three times more likely to be dependent on benefits than the average household, and twice as likely to be in unsuitable housing.	▪ Opportunities should be sought to provide housing that meets London-wide and local needs including the provision of affordable, low cost market, student and specialspecial needs housing. ▪ The Local Plan should seek to lift more LSOAs out of the bottom 10% for housing deprivation.	SEA: Population, Human Health HIA EqIA	1, 5, 11, 13, 14, 15

5.4 Cross boundary considerations

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

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

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

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

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

Consultation Question (d)

Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?

Consultation Question (e)

Is there any additional baseline information that you feel it would be important to include?

Consultation Question (f)

Are there any particular topics or geographical areas of specific concern to your organisation?

6 The IIA Framework

6.1.1 Background to the IIA Framework

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

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

6.1.2 Development of the IIA Objectives

The IIA Framework has been developed using the IIA Framework from the Draft Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) Integrated Impact Assessment (IIA) (February 2015)[9] as a base. This was analysed and refined, using the following:

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

Table 6-1 presents the proposed IIA objectives that will be used in the assessment of the Local Plan. Each of the IIA Objectives is supported by a series of sub-objectives to add further clarity and to assist the assessment process. However, it is noted that the objectives are not mutually exclusive and the assessment framework should be considered in its entirety. As such, the IIA Objectives are not presented in any particular order, with all objectives being considered as having equal weighting. The IIA Objectives included in **Table 6-1** below are:

1. To enhance the built environment and encourage 'place-making'
2. To optimise the efficient use of land through increased development densities and building heights, where appropriate

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

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

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

Table 6-1 Draft IIA Framework

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
1	**To enhance the built environment and encourage 'place-making'** ▪ Optimise development opportunities to develop and enhance local distinctiveness ▪ Ensure new buildings are appropriately designed and constructed including enabling access for all ▪ Create new, accessible, open spaces- public, communal, private and children's play space, public realm and spaces where children can play independently ▪ Maximise the contribution that the arts, culture and heritage can make to a community including building creativity, art, intrigue and surprise into the built environment ▪ Increase in the legibility of public spaces and increase walking and cycling routes within and adjacent to Old Oak and Park Royal ▪ Encourage the use of contemporary technology in the public realm to support design, delivery and management ▪ Encourage adherence to the principles of Lifetime Neighbourhoods	▪ *Provision of publicly accessible open space in accordance with the London Plan Categorisation[10]:* ○ *Regional Parks (400ha): 3.2 to 8km from homes;* ○ *Metropolitan Parks (60ha): 3.2km from homes;* ○ *District Parks (20ha): 1.2km from homes;* ○ *Local Parks and Open Spaces (2ha): 400m from homes;* ○ *Small Open Spaces (under 2ha): less than 400m from homes;* ○ *Pocket Parks (under 0.4ha): less than 400m from homes;* ○ *Linear Open Spaces (Variable): wherever feasible.* ▪ *Integration with the All London Green Grid Area Frameworks* ▪ *Number of new buildings and public spaces designed to be inclusive* ▪ *Proportion of new development incorporating an*	SEA: Population, Human Health, Material Assets, Cultural Heritage, Landscape HIA EqIA

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

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	▪ Maximise delivery of active frontages in appropriate locations Link to objectives 12 (heritage), 5 (housing); 13 (community cohesion); 14 (crime and fear of crime); 15 (health and wellbeing)	*appropriate level of open space for recreation* ▪ *Legibility and quality of the pedestrian and cycle environment* ▪ *Proportion of new development incorporating Lifetime Neighbourhoods principles* ▪ *Proportion of people who are happy with their local environment as a place to live* ▪ *Proportion of new development using technology to improve legibility*	
2	**To optimise the efficient use of land through increased development densities and building heights, where appropriate** ▪ Optimise housing density in a way that makes the most efficient use of land whilst meeting housing needs ▪ Optimise development density in a way that makes the most efficient use of land whilst meeting commercial needs Link to objectives 7 (natural resources use); and 8 (waste)	▪ *Housing density in comparison to neighbourhood quality* ▪ *Density of commercial development in comparison to existing (2015) levels*	SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets HIA
3	**Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land** ▪ Increase accessibility to household and commercial sustainable waste management facilities ▪ Improve soil quality and achieve more effective	▪ <u>Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles)</u> ▪ *Quality of soil resources* ▪ *Materials balance as a result of construction activities* ▪ *Development and implementation of a strategic land*	SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets HIA

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	geoconservation where appropriate ▪ Contribute to a scheme of strategic land remediation Link to objectives 4 (natural resources use); and 6 (waste)	*remediation scheme* ▪ *Amount of soil remediated on site*	
4	**Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods** ▪ Increase the co-location of services and facilities, in accessible locations by walking, cycling and public transport ▪ Increase the connection of the public realm and internal routes to local and strategic cycle and walking networks including via green infrastructure networks and the canal ▪ Prioritise walking and cycling over other forms of transport ▪ Increases the opportunity for the transport of goods and people by rail transport ▪ Consider the impact of construction on local infrastructure on local businesses ▪ Support the testing and implementation of future transport modes ▪ Mitigate the impact of construction traffic ▪ Maximise the accessibility of stations Link to objectives 7 (climate change); 11 (pollution); and 14 (safety)	▪ <u>Distribution of major transport systems – roads, rail links</u> ▪ *Modal shift of existing travel patterns verses future travel patterns* ▪ *Connectivity of the cycling and walking network* ▪ *Km of designated cycling and walking routes* ▪ *Proportion of goods arriving and leaving the area by rail in comparison to road* ▪ *Proportion of shared spaces within the urban environment* ▪ *Controlled parking zones, car clubs and travel plan measures implemented* ▪ *Number of accessible public transport interchanges and bus stops (source: Equal Life Chances for All 2009)* ▪ *Number of local businesses negatively affected by construction activities* ▪ *Increase in traffic on the highway network in and around the OPDC area*	SEA: Population, Human Health, Air, Climatic Factors, Material Assets, Landscape HIA EqIA

	Draft IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
5	**Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs** ▪ Provision of adaptable homes for independent living for older and disabled people ▪ Provision of homes to need the needs of older people including extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes ▪ Provision of housing suitable for family accommodation including single-parent families ▪ Increase in use of high quality design including meeting energy efficiency standards ▪ Provision of facilities to meet identified needs of Gypsies, Travellers and Travelling Show people ▪ Ensure all new homes meet Lifetime Homes standards Link to objectives 1 and 6 (sustainable design); 13 (community cohesion and social exclusion); 14 (secured by design); 15 (health)	▪ Dwelling Stock (Office for National Statistics Local Profiles). ▪ Household density (Office for National Statistics Local Profiles) ▪ *Proportion of LSOAs in the bottom 10% for housing deprivation* ▪ *Proportion of dwellings meeting all of the health and wellbeing credits in the Code for Sustainable Homes* ▪ *Proportion of dwellings that meet internal space standards* ▪ *Proportion of dwellings with a high SAP rating* ▪ *Proportion of the population considered to be homeless (source: Equal Life Chances for All 2009)* ▪ *Amount of family size housing (source: Equal Life Chances for All 2009)* ▪ *Proportion of single parent families living in unsuitable accommodation* ▪ *Amount of affordable housing (source: Equal Life Chances for All 2009)* ▪ *Amount of Lifetime Homes (source: Equal Life Chances for All 2009)* ▪ *Proportion of market, affordable and specialist housing*	SEA: Population, Human Health, Climatic Factors, Material Assets HIA EqIA

	Draft IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
		delivered.	
6	**Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect** ▪ Minimise the proportion of new development at risk of flooding ▪ Minimise the increase in risk of flooding elsewhere ▪ Increase the use of sustainable design including Sustainable Urban Drainage, natural ventilation and shading for temperature adaptation Link to objectives 10 (habitat connectivity); 7 (energy efficiency)	▪ River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009). ▪ Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map) ▪ Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map) ▪ *Proportion of energy usage in buildings using sustainable design compared with standard construction*	SEA: Biodiversity, Human Health, Water, Air, Climatic Factors, Material Assets, Landscape HIA EqIA
7	**To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy** ▪ Enable the area to be more self-sufficient in terms of energy generation and storage ▪ Increase the proportion of energy generated from low, zero or negative carbon energy sources ▪ Increase the proportion of journeys made by non-motorised transport ▪ Increase the use of sustainable design to minimise the resource requirements and outputs of new development	▪ Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles) ▪ All energy consumption by sector (Office for National Statistics Local Profiles and DECC) ▪ *Energy consumption per capita* ▪ *Greenhouse gas emissions per capita compared with London and national averages* ▪ *Proportion of journeys made by non-motorised transport* ▪ *Proportion of energy generated from low, zero or negative carbon energy sources*	SEA: Population, Human Health, Air, Climatic Factors, Material Assets HIA EqIA

	Draft IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	Link to objectives 4 (minimise the need to travel); 7 (sustainable design)		
8	**To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste** ▪ Promote the creation of a circular economy for the management of waste ▪ Increase the use of recycled materials for the construction of buildings and infrastructure ▪ Address the displacement of waste management to other areas ▪ Enable the sustainable management of contaminated soils and hazardous waste ▪ Increase accessibility to household and commercial sustainable waste management facilities ▪ Maximise use of innovative waste collection and waste management techniques including smart technology. Link to objectives 7 (resources use); 2 (efficient use of land); 3 (remediation)	▪ Number of active / historic landfills on the site (Environment Agency) ▪ Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles) ▪ Amount of residual waste per household (ONS) ▪ Amount of commercial and industrial waste produced (Defra) ▪ *Amount of waste recycled and re-used within the area* ▪ *Amount of waste transported within the area*	SEA: Biodiversity, Population, Human Health, Soil, Water, Climatic Factors, Material Assets, Landscape HIA EqIA
9	**Improve the quality of the water environment** ▪ Promote the improved efficiency in the use of water domestically and commercially ▪ Promote the improved quality of local watercourses	▪ Water and groundwater quality (Environment Agency) ▪ *Development of a site wide drainage strategy* ▪ *Water consumption per capita* ▪ *Increase in infrastructural capacity as a proportion of new*	SEA: Water, Human Health, Soil, Landscape HIA

	Draft IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	▪ Reduce the risk posed to the water environment from the run-off of contaminants ▪ Ensure that infrastructural capacity is sufficient to accommodate new development ahead of occupation Link to objectives 1 (biodiversity); 3 (climate change adaptation); 4 (climate change contributions); 5 (pollution); 7 (remediation)	*development* ▪ *Increased use of existing infrastructure*	
10	**Create and enhance biodiversity and the diversity of habitats across the area and its surroundings** ▪ Conserve or enhance existing biodiversity across the plan area, including on brownfield sites ▪ Increase the connectivity of habitats across the area and its surroundings ▪ Create new areas dedicated to nature conservation ▪ Seek to reduce the potential wide ranging impacts on international sites Link to objectives 3 (remediation); 6 (climate change adaptation); 9 (water environment); 11 (pollution)	▪ Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (MAGIC, www.magic.gov.uk and Local Authority websites). ▪ Key Biodiversity Action Plan (BAP) species and habitats present (London BAP) ▪ *Protected species with favourable conservation status* ▪ *Habitat connectivity* ▪ *Condition of Wormwood Scrubs Local Nature Reserve* ▪ *Condition of Grand Union Canal area of nature conservation* ▪ *Increase in areas of greenspace for biodiversity including inaccessible areas*	SEA: Biodiversity, Flora, Fauna HRA
11	**To minimise air, noise and light pollution, particularly for**	▪ Number and distribution of Air Quality Management Areas	SEA: Population, Human Health, Air,

	Draft IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	vulnerable groups ▪ Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development through the location of sensitive users away from high noise generators and the use of mitigation measures ▪ Minimise air pollution caused by traffic and commercial uses through the location of sensitive users away from areas of high air pollution and the use of mitigation measures ▪ Minimise light pollution Link to objectives 4 (sustainable transport); 7 (climate change); 15 (health)	(AQMAs) (Air Quality Archive[11]) ▪ *Ill health attributed to air, noise or light pollution* ▪ *Proportion of the population affected by high levels of noise during construction and post construction including a breakdown by equality group* ▪ *Proportion of the population affected by light pollution from traffic or industry during construction and post construction including a breakdown by equality group* ▪ *Proportion of population living within areas with regular exceedances in NOx and particulates*	Material Assets HIA EqIA
12	**To conserve and, where appropriate, enhance, cultural heritage** ▪ Promote the historical interpretation of heritage assets, including the canal, through the use of multifunctional green infrastructure ▪ Minimise heritage assets lost to new development ▪ Avoid adverse impacts on the setting of heritage assets ▪ Maximise the reuse and adaptation of heritage assets for place-making	▪ Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens (www.magic.gov.uk). ▪ *Decrease in the number of Heritage Assets at Risk in and around the area* ▪ *Increase in the number of heritage assets identified and protected* ▪ *Increase in the number of heritage assets highlighted and*	SEA: Cultural Heritage, Material Assets, Biodiversity, Climatic Factors, Landscape HIA

[11] http://uk-air.defra.gov.uk/aqma/maps

	Draft IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	▪ Enhance local views and landscapes ▪ Reduce the number of Heritage Assets at Risk in and around the area ▪ Reduce impacts on heritage assets and their settings in areas adjacent to the plan area ▪ Enhance areas of greenspace in connection with areas of importance for heritage protection Link to objectives 1 (place-making) and 3 (reuse of existing buildings)	*enhanced or utilised for place-making and interpretation* ▪ *Development of a local views strategy and proportion of new developments adhering to its principles*	
13	**Increase community cohesion and reduce social exclusion** ▪ Improve the quality of the public realm and increase the provision, accessibility and quality of public open spaces including play spaces ▪ To increase connectivity and avoid physical barriers and severance across the area, creating physical and social linkages with the surrounding communities ▪ Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 14 (crime and fear of crime); 15 (health)	▪ *Number of offices converted to residential under permitted development rights* ▪ *Schemes to reduce the impact of construction on the local community*	SEA: Population, Human Health, Climatic Factors, Landscape, Material Assets HIA EqIA
14	**Improve safety and reduce crime and the fear of crime** ▪ Increase natural surveillance and other measures to design out	▪ Crime rates (Indices of Deprivation) ▪ *Road traffic accidents and diversity profiling (source:*	SEA: Population, Human Health,

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	crime ▪ Encourage increased safety through the use of traffic management and calming methods Link to objectives 1 (place-making); 4 (sustainable transport); 5 (housing); 13 (community cohesion); 15 (health)	*Equal Life Chances for All 2009)* ▪ *Percentage of people who feel that there is less discrimination in their neighbourhood than 3 years ago (source: Equal Life Chances for All 2009)* ▪ *Percentage of the local population who feel personal safety on buses, tubes and trains (source: Equal Life Chances for All 2009)* ▪ *Percentage of women who feel safe using local bus, tube, trains, black cabs, and mini cabs at night, alone (source: Equal Life Chances for All 2009)* ▪ *Proportion of developments incorporating Secured by Design principles*	Material Assets HIA EqIA
15	**Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living** ▪ Increase accessibility to social infrastructure including health care facilities, schools, social care and community facilities ▪ Increase the capacity of local social infrastructure ▪ Encouragement of opportunities for buildings with a shared community use and the co-location of services ▪ Facilitate the supply of local food through the provision of space for uses such as allotments or farmers markets ▪ Reduce the potential for an over-concentration of hot food	▪ <u>Health Deprivation and Disability (Indices of Deprivation for England 2010)</u> ▪ *Proportion of the population living within walking distance of health care facilities* ▪ *Proportion of the population living within walking distance of education facilities* ▪ *Proportion of the population living within walking distance of social care facilities* ▪ *Proportion of the population living within walking distance of community facilities* ▪ *Proportion of the population with access to space for the*	SEA: Population, Human Health, Material Assets, Soil, Air, Water, Landscape HIA EqIA

	Draft IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	takeaways in the local area ▪ Minimise construction phase impacts on both physical and psychological health Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 13 (social and economic wellbeing)	*growing of food locally* ▪ *Increase in the capacity of local social infrastructure* ▪ *Childhood obesity rates* ▪ *Life expectancy*	
16	**To improve the education and skills levels of all members of the population, particularly vulnerable groups** ▪ Increase in the availability of formal education across all age groups, including adults from all equality groups ▪ Increase in the availability of informal education and training for all Link to objectives 4 (accessibility); 13 (community cohesion); 15 (health and wellbeing); 117 (social and economic wellbeing); 18 (sustainable economic growth)	▪ Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles). ▪ Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles). ▪ Education, Skills and Training Deprivation (Indices of Deprivation for England 2010). ▪ *Proportion of the population with access to appropriate education facilities by sustainable transport modes* ▪ *Decrease in educational underachievement gap between disadvantaged groups and the wider community (source: Equal Life Chances for All 2009)*	SEA: Population, Human Health, Material Assets HIA EqIA
17	**Maximise the social and economic wellbeing of the population and improve access to employment and training** ▪ Provision of access to a range of high quality local employment opportunities for local people, both during construction and permanent jobs, including those from disadvantaged groups ▪ Encourage workforces to reflect local diversity in all occupations	▪ Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010) ▪ *Proportion of new employment and training opportunities being awarded to local people via local procurement arrangements* ▪ *Proportion of new employment and training opportunities*	SEA: Population, Human Health, Material Assets HIA EqIA

	Draft IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	and at all levels ▪ Provision of access to a range of work-based and other training opportunities for local people, including those from disadvantaged groups ▪ Provision of a range of retail stores, including food stores and smaller affordable shops for social enterprises ▪ Increase in the provision of facilities for childcare ▪ Encouragement of employer's to adopt the London Living Wage Link to objectives 15 (health and wellbeing); 116 (education and training) and 18 (sustainable economic growth)	*being awarded to local women via local procurement arrangements* ▪ *Employment rate by excluded group compared to employment rate of all Londoners (source: Equal Life Chances for All 2009)* ▪ *Workforce profile at all levels (source: Equal Life Chances for All 2009)* ▪ *Levels of Child Poverty (source: Equal Life Chances for All 2009)* ▪ *Number of childcare places (source: Equal Life Chances for All 2009)* ▪ *Take-up of subsidised childcare places (including those for disabled children) benchmarked against the LDA Childcare Affordability Programme (source: Equal Life Chances for All 2009)*	
18	**To encourage inward investment alongside investment within existing communities, to create sustainable economic growth** ▪ Increase in the net number of businesses registered in the area ▪ Increase infrastructure and utilities capacity, including broadband connections ▪ Ensure workspace meets the needs of new and emerging businesses, including affordable, flexible and micro/SME workspace	▪ Economy Local Profiles (ONS) ▪ Employment by industry (ONS- NOMIS) ▪ *Proportionate coverage of broadband across the area* ▪ *Proportion of new employment development that includes an element of affordable workspace* ▪ *New businesses categorised as 'health-led'*	SEA: Population, Human Health, Material Assets HIA EqIA

	Draft IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	▪ Deliver retail that does not negatively impact on neighbouring town centres ▪ Encourage the development of employment growth sectors including clean, green and healthy businesses ▪ Support the relocation of business from Old Oak to Park Royal. ▪ Intensify the use of workspaces within Park Royal Link to objectives 16 (education and training) and 17 (social and economic wellbeing).	▪ *Amount of new employment floorspace in Old Oak* ▪ *Amount of new industrial floorspace in Park Royal*	

Consultation Question (g)

Are there any changes you consider should be made to the IIA Framework, IIA Objectives / sub-objectives or indicators?

7 Next Steps

This Scoping Report has outlined how we intend to undertake the IIA of the Local Plan. Throughout this report we have included a series of questions we would like you to answer when providing your consultation responses. A list of the questions is provided below:

(a) Do you have any further suggestions regarding the scope of the IIA and its proposed appraisal of the Local Plan?

(b) Are there any additional PPPs that should be considered for review?

(c) Are there any additional themes that could be drawn out of the review of PPPs?

(d) Do you agree with the sustainability issues and opportunities that we have identified? Are there additional issues that both the IIA and the Local Plan should consider?

(e) Is there any additional baseline information that you feel it would be important to include?

(f) Are there any particular topics or geographical areas of specific concern to your organisation?

(g) Are there any changes you consider should be made to the IIA Framework, IIA Objectives / sub-objectives or indicators?

Responses to this consultation should be sent by 5pm on 9th October to:

info@opdc.london.gov.uk

Or

Local Plan Sustainability Scoping Report Consultation
Old Oak and Park Royal Development Corporation
City Hall,
The Queen's Walk,
More London Riverside,
London SE1 2AA

Following the receipt of the consultation comments, they will be reviewed and modifications made to the scope of the IIA as necessary. Stage B of the IIA process comprising the appraisal of the Local Plan will commence following refinement of the scope. It is expected that the next consultation on the IIA Report will be undertaken alongside the consultation on the draft Local Plan.

Appendix A

Scoping Workshop Attendees and Findings

Table A-1 Workshop attendees

Name	Role	Organisation
Peter Farnham	Planner	OPDC
Rachel Flowers	Health Advisor	OPDC
Andrew Jones	Environment team	GLA
David English	Historic Places Advisor	Historic England
Claire Jones	Planner	LB Brent
Samuel Cuthbert	Planner	LB Ealing
Stuart Lines	Associate Director of Public Health	LB Hammersmith and Fulham
Lucy Saunders	Public Health Director	TfL/GLA
Gillian Kavanagh	Planner	RB Kensington & Chelsea
Steve Walker	Principal Planner - London	Environment Agency
Katherine Fletcher	Heritage and Conservation Officer	Historic England

Table A-2 Key Sustainability Issues and Opportunities from Scoping Workshop: Consultee responses

Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
Economy, employment and training	**Issues** ▪ Infrastructure/Utilities – a key issue for the area is how infrastructure/utilities will be improved to accommodate the new development. In particular, broadband capacity is very poor at present within Park Royal. Also transport links need significant improvement. ▪ Town centres – there is a potential issue that the development of offices and retail facilities within the OPDC area would destroy neighbouring town centres, including Ealing town centre. ▪ Affordable workspace – much of the available workspace is affordable at present, due to its poor quality. There is also an issue relating to density in this area – warehousing uses are low employment generators. ▪ Displacement of existing businesses – especially hostile in Old Oak ▪ How do we create jobs for local people if the business make-up of area changes? (i.e. Proposals for R&D into climate change, circular economies but current use is more low-skilled and manufacturing) ▪ Microbusiness disruption during construction (they exist hand to mouth sometimes)	▪ Incoming retail could be developed in small clusters. This could help to reduce the impact on other town centres. A fine balance between place-making, providing enough facilities, and not destroying external town centres, needs to be sought. Improved connectivity from the OPDC area to the town centres could be beneficial in this respect. Harlesden town centre would be walkable from the OPDC area. ▪ The effect of the construction phase of development could be significantly negative for existing business, through the potential impact on the transport network. A large transitory construction workforce could also have negative effects on the community. ▪ Potential for the withdrawal of PD Rights for the conversion of offices to residential use, to prevent the reduction in community cohesion and access to facilities.
	Opportunities ▪ Healthy New Towns – The OPDC is looking to submit a bid to become a Healthy New Town to NHS England. This is based on health-led employment in the centre, for clean, green and healthy technology businesses. This may include research companies etc. ▪ North Acton could expand on its existing student accommodation to attract further university facilities in the OPDC area, which would buffer the industrial area further north, with an area of student housing further south. Anecdotal evidence suggests that the campus may be associated with Imperial College. ▪ Affordable workspace – there is potential to create flexible/shared office environments, whereby users can rent desk-space without the need for a formal lease agreement for an entire office. ▪ The land uses in the OPDC area are likely to experience a wholesale change from the existing	▪ Managing affordability ▪ Managing and creating robust S106 and CIL agreements ▪ Management of robust conditions that are deliverable and enforceable.

Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
	situation. This could provide an opportunity to reduce disparities across the area, although may push out existing businesses. ▪ Employment and training - There is an opportunity for the Local Plan to specify that incoming employment opportunities are to be directed towards local people in the existing and surrounding communities. This combines with an opportunity to upskill the local workforce, the majority of whom may currently be in lower-skilled jobs in the local area.	
Social	**Issues** ▪ Accessibility – there is currently poor public transport access to the OPDC area – to get in to the area, would have to get a train to a tube station and then walk into the area from there. Further, there is poor wayfaring within the site. ▪ Lack of primary healthcare ▪ Hard edges – there are a number of 'hard edges' within the site, which create poor legibility. ▪ There is a Traveller site next to Old Oak on Backley Road, which is linear against the railway line and a metal refinery. ▪ Lack of affordable housing ▪ Unknown future population that needs to be modelled – draw on lessons learnt from Kings Cross ▪ How will site link to other areas outside OA boundaries? ▪ Canal towpath plans need to be aware of how constrained the space is – can we accommodate all uses and users?	▪ HIA scope should consider the surrounding area, incoming residents and people coming in for work/visiting/travelling through. ▪ Construction phase impacts should be considered within the Local Plan- including both psychological and physical effects. ▪ Ensure Local Plan robust enough to deal with minimum %ages of affordable housing
	Opportunities ▪ Incoming population – there is an opportunity for the health of the local community to be built in to the Local Plan principles from the very beginning. This may include building in street networks, designed so that children can play independently; or building in creativity, art, intrigue, surprise – to create a sense of place and a high quality environment. ▪ There is an opportunity to significantly improve accessibility to and throughout the site, including the creation of legible routes and reducing 'hard edges'.	▪ The Local Plan should consider minimising the use of on-street parking and servicing at the fronts of buildings, as these can have a negative effect on the 'street atmosphere'.
Environment	**Issues** ▪ There is currently poor accessibility to open space/green infrastructure/play space.	▪ The Local Plan could minimise the use of on-street parking and servicing at the fronts of buildings, as these can have a negative effect

Topic	Summary of issues raised by Scoping Workshop attendees	Implications for the Local Plan
	▪ River Brent and the Grand Union Canal – the water quality in these areas is currently very poor – biological and chemical. ▪ Remediation – Land contamination is a key issue in the area, particularly in certain areas, depending on the presence of London Clay. ▪ There are currently 2 large waste sites, which serve London. Concerns were raised regarding their potential displacement. This may lead to a waste apportionment issue/create problems of pollution outside of the plan area as a result of development in the OPDC area. ▪ Heritage at Risk – there are areas of townscape/heritage issues across the plan area. Twyford Abbey and Hereford St Mary are included in the local list. And also to account for views. Although archaeology is not a priority, this will also need to be assessed. ▪ Surface Water assessments to be more than site-wide but dealt with on strategic level – TW keen to ensure that new developments do not assume that capacity is available (due to provision of new TW assets)	on the 'street atmosphere'. ▪ Adoption and maintenance of new assets – London Legacy Development Corporation lessons learnt? ▪ Cross-boundary issues with respect to heritage assets and views need to be addressed. ▪ Thames Water and Counters Creek combined sewer discussion/CIL/S106 payments to deal with a system already at capacity
	Opportunities ▪ Green Infrastructure – there is an opportunity to create green infrastructure which facilitates live/work/play/travel through as well as fast and meandering routes. ▪ Improvement to AQMA likely due to redevelopment of area but needs to ensure that population increase doesn't counteract that. ▪ There is an opportunity to create SUDS across the area and reduce potentially polluting discharges to watercourses – also need to address differences in catchments between east and west. ▪ London Waste and Recycling Board – there is an opportunity for the OPDC area to become an example centre for the creation of an 'integrated circular economy'. This could include the creation, use and recycling of products locally, including the potential for the growing of local food through the use of vertical farms. ▪ Urban Heat Island Effect – opportunity to crease a decentralised energy hub and create a closed loop system. ▪ An increase in population and new industries may create an opportunity to reduce pollution locally and increase efficiency/cleanliness.	▪ The Local Plan should facilitate the use of green infrastructure, but also manage the spread of routes across the OPDC area, so that certain routes do not become congested. ▪ The Local Plan should seek to ensure that improvements in the area do not lead to increase pollution/traffic etc, elsewhere across London.

Appendix B

Review of Plans, Programmes and Environmental Protection Objectives

Table B-1 Sustainability Themes derived from the review of Policies, Plans and Programmes

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
Environment			
Promote sustainable design and mitigate and adapt to climate change	– Climate change Act 2008 – UK Climate Change Programme 2006 – National Planning Policy Framework 2012 – Sustainable Development Strategy 2005	– The London Plan 2011, 2013, 2015 – Green Infrastructure and Open Environments SPG 2012 – Sustainable Design and Construction SPG 2014 – The Mayor's Food Strategy 2008 – The Mayor's Climate Change Mitigation and Energy Strategy 2011 – The Mayor's Climate Change Adaption Strategy 2011	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Ealing Sustainable Community Strategy 2006-2016
Promote and protect the water environment including issues such as quality and resource use as well as reducing flood risk	– Water Framework Directive 2000/60/EC – Urban Waste Water Treatment Directive 91/271/EEC – Flood and Water Management Act 2010 – National Planning Policy Framework 2012 – Sustainable Development Strategy 2005 – Future Water 2011	– The London Plan 2011, 2013, 2015 – Green Infrastructure and Open Environments SPG 2012 – Sustainable Design and Construction SPG 2014 – Securing London's Water Future 2011 – Thames River Basin District RBMP 2009	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Hammersmith and Fulham Updated Surface Water Management Plan 2015
Reduce greenhouse gas emissions, increase energy efficiency and promote the use of renewable energy and renewable technologies in appropriate locations	– Directive on the Promotion of the Use of Energy from Renewable Sources 2209/28/EC – Energy Act 2013 – National Planning Policy Framework 2012 – Sustainable Development Strategy 2005 – The UK Low Carbon Transition Plan 2009 – The Carbon Plan 2011 – UK Renewable Energy Strategy 2009	– The London Plan 2011, 2013, 2015 – Sustainable Design and Construction SPG 2014 – The Mayor's Climate Change Mitigation and Energy Strategy 2011 – The Mayor's Climate Change Adaption Strategy 2011	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Ealing Sustainable Community Strategy 2006-2016
Promote sensitive	– Waste Framework Directive 2006/12/EC	– The London Plan 2011, 2013, 2015	– West London Joint Waste Plan 2014

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
waste management	– National Planning Policy Framework 2012 – Sustainable Development Strategy 2005	– Sustainable Design and Construction SPG 2014	– Ealing Sustainable Community Strategy 2006-2016
Protect and enhance the historic environment and recognise and appreciate landmarks and townscapes	– European Convention on the Protection of the Archaeological Heritage (revised) (1992) – Planning (Listed Building and Conservation Areas) Act 1990 – Ancient Monuments and Archaeological Areas Act 1979 – National Planning Policy Framework 2012 – Sustainable Development Strategy 2005	– The London Plan 2011, 2013, 2015 – London View Management Framework SPG 2012	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Ealing Green Space Strategy 2012-2017
Conserve and enhance biodiversity as an integral part of economic, social and environmental development	– European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats – Wildlife and Countryside Act 1981 – National Planning Policy Framework 2012 – Sustainable Development Strategy 2005 – UK Post-2010 Biodiversity Framework 2012	– The London Plan 2011, 2013, 2015 – Green Infrastructure and Open Environments SPG 2012 – Mayor's Biodiversity Strategy 2002 – London Biodiversity Action Plan 2001	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011
Achieve more effective geoconservation and improve soil quality		– London's Foundations Protecting the Geodiversity of the Capital 2012 – The Mayor's Food Strategy 2008 –	– Food Growing and Allotments Strategy for Brent 2014/16 – Hammersmith and Fulham Contaminated Land Strategy 2001
Optimise the use of land through increasing the density of development		– The London Plan 2011, 2013, 2015	
Improve air quality	– EU Directive on Ambient Air Quality and Management 96/62/EC – National Planning Policy Framework 2012	– The London Plan 2011, 2013, 2015 – Green Infrastructure and Open Environments SPG 2012 – Mayors Air Quality Strategy 2010	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
	– Sustainable Development Strategy 2005 – UK Air Quality Strategy 2011		
Minimise the adverse impacts of noise on people living and working in, and visiting the area	– European Directive: Environmental Noise Directive 2002/49/EC – National Planning Policy Framework 2012 – Noise Policy Statement for England 2010	– The London Plan 2011, 2013, 2015 – Green Infrastructure and Open Environments SPG 2012 – The Mayor's Ambient Noise Strategy 2004	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011
Social			
Improve health and well-being and promote greater levels of physical activity	– Health for Growth 2014-2020 – National Planning Policy Framework 2012 – Sustainable Development Strategy 2005 – Health Lives, Healthy People 2011	– The London Plan 2011, 2013, 2015 – Green Infrastructure and Open Environments SPG 2012 – Draft Housing SPG 2015 – Sustainable Design and Construction SPG 2014 – Play and Informal Recreation SPG 2012 – The Mayor's Food Strategy 2008 – The London Health Inequalities Strategy 2010 – Improving Londoners Access to Nature 2008	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Brent Parks Strategy 2010-2015 – Food Growing and Allotments Strategy for Brent 2014/16 – Brent Draft Community Safety Strategy 2014-17 – Brent Health and Wellbeing Strategy 2014-17 – A Plan for Children and Families in Brent 2012-2015 – Ealing Quality of Life for Older People 2006-2016 – Ealing Green Space Strategy 2012-2017 – Hammersmith and Fulham Health and Wellbeing Strategy 2013-15 – Hammersmith and Fulham Parks and Open Spaces Strategy 2008-2018 – Hammersmith and Fulham CSPAN Physical Activity Strategy 2011 – Ealing Sustainable Community Strategy 2006-2016

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
To create an equal society which recognises people's different needs, situations and goals, and removes the barriers that limit what people can do and be	– Equality Act 2010 – National Planning Policy Framework 2012	– The London Plan 2011, 2013, 2015 – Sustainable Design and Construction SPG 2014 – Social Infrastructure SPG 2015 – Play and Informal Recreation SPG 2012 – The Mayor's Food Strategy 2008 – The London Health Inequalities Strategy 2010 – Planning for Equality and Diversity in London SPG 2007 – Improving Londoners Access to Nature 2008 – The Mayor's Equality Framework 2009	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Brent Equality Strategy 2015-19 – A Regeneration Strategy for Brent 2010-2030 – A Plan for Children and Families in Brent 2012-2015 – Ealing Quality of Life for Older People 2006-2016 – Old Oak and Park Royal draft Opportunity Area Planning Framework 2015 – Ealing Sustainable Community Strategy 2006-2016
Maximise the contribution that the arts, culture and heritage can make to the community		– The London Plan 2011, 2013, 2015 – Play and Informal Recreation SPG 2012 – The Mayor's Food Strategy 2008 – The Mayor's Culture Strategy 2014 – Shaping Neighbourhoods: Character and Context 2014	– Food Growing and Allotments Strategy for Brent 2014/16 – Cultural Strategy for Brent 2010-15 – Ealing Arts and Cultural Strategy 2013-2018 – Old Oak and Park Royal draft Opportunity Area Planning Framework 2015 – Ealing Sustainable Community Strategy 2006-2016
The need to ensure that new housing development meets local needs (for all sections of society)	– National Planning Policy Framework 2012 – Planning Policy for Traveller Sites 2012	– The London Plan 2011, 2013, 2015 – Draft Housing SPG 2015 – Sustainable Design and Construction SPG 2014	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Ealing Quality of Life for Older People 2006-2016 – Hammersmith and Fulham Housing Strategy 2015 – Old Oak and Park Royal draft Opportunity Area Planning Framework 2015 – Ealing Sustainable Community Strategy

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
			2006-2016
Promote more sustainable transport choices and to improve accessibility	– National Planning Policy Framework 2012 – Sustainable Development Strategy 2005	– The London Plan 2011, 2013, 2015 – Land for Industry and Transport SPG 2012 – Mayor's Transport Strategy 2010	– West London Sub Regional Transport Plan 2010 – Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Old Oak and Park Royal draft Opportunity Area Planning Framework 2015 – Park Royal Southern Gateway Position Statement 2008
Recognise the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life	– National Planning Policy Framework 2012	– The London Plan 2011, 2013, 2015 – Green Infrastructure and Open Environments SPG 2012 – Play and Informal Recreation SPG 2012 – The Mayor's Food Strategy 2008 – Improving Londoners Access to Nature 2008	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Brent Parks Strategy 2010-2015 – Food Growing and Allotments Strategy for Brent 2014/16 – Ealing Green Space Strategy 2012-2017 – Hammersmith and Fulham Parks and Open Spaces Strategy 2008-2018 – Old Oak and Park Royal draft Opportunity Area Planning Framework 2015
Improve educational attainment and training opportunities	– Policy statement: Planning for schools development 2011 – National Planning Policy Framework 2012	– The London Plan 2011, 2013, 2015	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Ealing Sustainable Community Strategy 2006-2016
Reduce crime and fear of crime	– National Planning Policy Framework 2012	– The London Plan 2011, 2013, 2015 – Sustainable Design and Construction SPG 2014 – Play and Informal Recreation SPG 2012	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – Brent Draft Community Safety Strategy

Common theme	PPPs Reviewed		
	International/ National	Regional / London	West London/Local
			2014-17 – Ealing Sustainable Community Strategy 2006-2016
Economic			
Promote sustainable economic development and a range of employment opportunities	– National Planning Policy Framework 2012 – Sustainable Development Strategy 2005	– The London Plan 2011, 2013, 2015 – Land for Industry and Transport SPG 2012 – The Mayor's Economic Development Strategy 2010	– Brent Core Strategy 2010 – Ealing Core Strategy 2012 – Hammersmith and Fulham Core Strategy 2011 – A Regeneration Strategy for Brent 2010-2030 – Old Oak and Park Royal draft Opportunity Area Planning Framework 2015 – Ealing Sustainable Community Strategy 2006-2016 – Park Royal Southern Gateway Position Statement 2008

Appendix C

Baseline Data

C. The Sustainability Baseline and Key Sustainability Issues

C.1 Population

The following baseline indicators have been used to identify key population trends and characteristics:

- Total population (2011 Census and Neighbourhood Statistics[12]).
- Area of Ealing, Brent and Hammersmith & Fulham (Office for National Statistics Local Profiles).
- Population density (Office for National Statistics Local Profiles).
- Age structure of the population (Office for National Statistics Local Profiles and 2011 Census).
- Mean household size (Office for National Statistics Local Profiles).
- Ethnic groups represented in the population (Office for National Statistics Local Profiles).
- Faith communities represented in the population (OAPF Draft IIA Report, GLA, February 2015)
- Gender balance and pay gap (OAPF Draft IIA Report, GLA, February 2015)

C.1.1 OPDC Area

The population of OPDC is just under 5,000 people contained in 1,898 households. **Figure C1-1** indicates the population density of the area.

Figure C1-1 Comparative Population Density

Source: OAPF Draft IIA Report, GLA, February 2015

The OPDC area covers some 650 hectares and due to its predominantly industrial nature has a much lower population density than its adjoining boroughs. Given the proposed minimum new homes of 25,500 this density is set to change. This influx of future population needs careful management to ensure inequalities don't worsen throughout the area and adjoining boroughs.

Figure C1-2 Age profile

Area	Total	Male	Female	Age 0-4	Ag5-17	Age 18-24	Age 25-64	Age 65-84	Age 85 +
England & Wales	56,075,912	49.2%	50.8%	6.2%	15.1%	9.4%%	52.8%	14.2%	2.2%
England	53,012,456	49.2%	50.8%	6.3%	15.1%	9.4%	52.9%	14.1%	2.2%
London	8,173,941	49.3%	50.7%	7.2%	14.9%	10.0%	56.7%	9.6%	1.5%
Inner London	3,231,901	49.8%	50.2%	7.0%	13.3%	11.4%	59.7%	7.5%	1.1%
Outer London	4,942,040	49.1%	50.9%	7.4%	16.0%	9.2%	54.7%	10.9%	1.8%
Ealing	338,449	50.0%	50.0%	7.5%	15.1%	9.3%	57.4%	9.3%	1.4%
Brent	311,215	50.3%	49.7%	7.2%	15.4%	10.1%	56.8%	9.3%	1.2%
Hammersmith and Fulham	182,493	48.7%	51.3%	6.5%	11.3%	11.4%	61.8%	7.9%	1.1%
Park Royal & Old Oak	4,941	51.2%	48.8%	8.0%	14.2%	12.5%	59.3%	5.6%	0.5%

Source: Census 2011

As shown in **Figure C1-2**, the OPDC area contains a large proportion of working age adults and a smaller population of ages 65+ than the surrounding boroughs. Careful consideration

should be given to the wider population trend of an ageing population as well ensuring an attractive area for young adults and those who may be looking to raise a family.

Figure C1-3 Components of population change

Components of population change

mid-2011 to mid-2012

	Live births Thousands	Deaths Thousands	Natural change Thousands	Net migration & other changes Thousands	Total change Thousands
Brent	5.3	1.6	3.8	-1.3	2.4
Hammersmith and Fulham	2.7	0.9	1.8	-4.4	-2.6
Ealing	5.7	1.9	3.8	-2.5	1.4
London	134.0	47.6	86.5	17.5	104.0

Source: ONS Local Profiles

Although there is a net loss of population from Brent, Ealing and Hammersmith & Fulham, there is a continued influx of people into London and this needs to be addressed as part of the area's redevelopment proposals.

The population of OPDC is ethnically diverse. Data indicates that 21.6% of the population were White British, with 18.6% identifying themselves as White Other (**Table C1-4**). Black African or Black Others are the main ethnic minority within OPDC, representing 24% of the population.

Table C1-4 Percentage of population by ethnic group

Area	England & Wales	England	London	Inner London	Outer London	Ealing	Brent	Hammersmith and Fulham	Park Royal & Old Oak
White British	80.5%	79.8%	44.9%	38.4%	49.2%	30.4%	18.0%	44.9%	21.6%
White Irish	0.9%	1.0%	2.2%	2.3%	2.0%	3.1%	4.0%	3.5%	2.5%
White Gypsy Irish Traveller	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.6%
White Other White	4.4%	4.6%	12.6%	16.5%	10.1%	15.4%	14.3%	19.6%	18.6%
Mixed White and BlackCaribbean	0.8%	0.8%%	1.5%	1.8%	1.3%	1.2%	1.4%	1.5%	1.6%
Mixed White BlackAfrican	0.3%	0.3%	0.8%	1.0%	0.7%	0.6%	0.9%	0.8%	2.0%
Mixed WhiteAsian	0.6%	0.6%	1.2%	1.3%	1.2%	1.4%	1.2%	1.5%	1.4%
Mixed OtherMixed	0.5%	0.5%	1.5%	1.8%	1.2%	1.3%	1.6%	1.7%	2.1%
Asian Indian	2.5%	2.6%	6.6%	3.4%	8.8%	14.3%	18.6%	1.9%	5.3%
Asian Pakistani	2.0%	2.1%	2.7%	1.9%	3.3%	4.3%	4.6%	0.9%	2.0%
Asian Bangladeshi	0.8%	0.8%	2.7%	5.1%	1.2%	0.5%	0.6%	0.6%	0.6%
Asian Chinese	0.7%	0.7%	1.5%	2.0%	1.2%	1.2%	1.0%	1.7%	3.0%
Asian Other Asian	1.5%	1.5%	4.9%	3.6%	5.7%	9.3%	9.2%	4.0%	5.6%
Black African	1.8%	1.8%	7.0%	8.6%	6.0%	5.1%	7.8%	5.8%	12.3%
Black Caribbean	1.1%	1.1%	4.2%	5.4%	3.5%	3.9%	7.6%	3.9%	8.2%
Black Other Black	0.5%	0.5%	2.1%	2.8%	1.6%	1.9%	3.4%	2.1%	3.5%
Other Arab	0.4%	0.4%	1.3%	1.6%	1.1%	2.9%	3.7%	2.9%	5.8%
Other Other	0.6%	0.6%	2.1%	2.6%	1.9%	3.1%	2.1%	2.7%	3.2%
Total	56,075,912	53,012,456	8,173,941	3,231,901	4,942,040	338,449	311,215	182,493	4,941

Source: Census 2011

The largest religious community in the OPDC area is Christian at 48.7%, which is higher than the London average of 48.4%, but lower than the English average of 59.4%. This is followed by Muslim at 21.7%, compared to a London average of 12.4% and an English average of 5%. Within the plan area, 14.6% stated no religion, which is lower than the London average of 20.7% and English average of 24.7%. Other minorities include Hindu (3.9%), Buddhist (1.4%), Sikh (1.2%), other religion (0.8%) and Jewish (0.3%).

Table C1-5 Percentage of population by religion

Area	Total	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	No religion	Religion not stated
England & Wales	56,075,912	59.3%	0.4%	1.5%	0.5%	4.8%	0.8%	0.4%	25.1%	7.2%
England	53,012,456	59.4%	0.5%	1.5%	0.5%	5.0%	0.8%	0.4%	24.7%	7.2%
London	8,173,941	48.4%	1.0%	5.0%	1.8%	12.4%	1.5%	0.6%	20.7%	8.5%
Inner London	3,231,901	45.4%	1.1%	2.2%	1.6%	14.4%	0.5%	0.5%	23.9%	10.4%
Outer London	4,942,040	50.4%	0.9%	6.9%	1.9%	11.1%	2.3%	0.7%	18.6%	7.2%
Ealing	338,449	43.7%	1.2%	8.5%	0.3%	15.7%	7.9%	0.6%	15.0%	6.9%
Brent	311,215	41.5%	1.4%	17.8%	1.4%	18.6%	0.5%	1.2%	10.6%	6.9%
Hammersmith and Fulham	182,493	54.1%	1.1%	1.1%	0.6%	10.0%	0.2%	0.5%	23.8%	8.4%
Park Royal Total	4,941	48.7%	1.4%	3.9%	0.3%	21.7%	1.2%	0.8%	14.6%	7.3%

Source: Census 2011

A study on the gender pay gap by the Government Equalities Office showed that 10% of the overall pay gap can be attributed to occupational sex segregation. A 10% greater share of men in an occupation is associated with 2 per cent higher average hourly wages. 12% of the gap is due to the industries in which men and women work, 21% is due to difference in years of experience of full-time work, 16% is due to negative effect on wages of having previously worked part –time or having taken time out of the labour market to loof after family. 36% of the pay gap cannot be explained by any of the characteristics that have been controlled for in the study.

Table C1-6 Percentage of population by gender

Area	Total	Male	Female
England & Wales	56,075,912	49.2%	50.8%
England	53,012,456	49.2%	50.8%
London	8,173,941	49.3%	50.7%
Inner London	3,231,901	49.8%	50.2%
Outer London	4,942,040	49.1%	50.9%
Ealing	338,449	50.0%	50.0%
Brent	311,215	50.3%	49.7%
Hammersmith and Fulham	182,493	48.7%	51.3%
Park Royal & Old Oak	4,941	51.2%	48.8%

Source: Census 2011

Table C1-7 Marital Status

Area	All Categories	Single	Married	Same Sex Civil Partnership	Separated	Divorced	Widowed
England & Wales	45,496,780	34.6%	46.6%	0.2%	2.6%	9.0%	7.0%
England	42,989,620	34.6%	46.6%	0.2%	2.7%	9.0%	6.9%
London	6,549,173	44.1%	39.8%	0.4%	3.2%	7.4%	5.0%
Inner London	2,636,853	53.5%	31.2%	0.7%	3.5%	7.3%	3.9%
Outer London	3,912,320	37.8%	45.7%	0.3%	3.0%	7.4%	5.8%
Ealing	269,572	40.6%	44.1%	0.4%	3.0%	6.8%	5.1%
Brent	248,458	42.1%	43.2%	0.3%	3.4%	6.2%	4.7%
Hammersmith and Fulham	152,863	55.9%	29.6%	0.5%	2.9%	7.4%	3.7%
Park Royal & Old Oak	3931.3	50.7%	34.2%	0.5%	4.1%	7.5%	3.0%

Source: Census 2011

C.1.3 Data Gaps and Uncertainties

- Future population makeup for OPDC area
- Proportion of the population that is transgender/has undergone gender reassignment

- Sexual Orientation of the population
- Data on pregnancy and maternity in relation to the local population and employment

C.2 Education and Qualifications

The following baseline indicators have been used to characterise levels of education and attainment:

- Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).
- Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles).
- Education, Skills and Training Deprivation (Indices of Deprivation for England 2010).

C.2.1 OPDC Area

The area's level of skills and educational deprivation is average though there is great disparity between the adjoining boroughs. The low population density also creates uncertainty in the identification of trends.

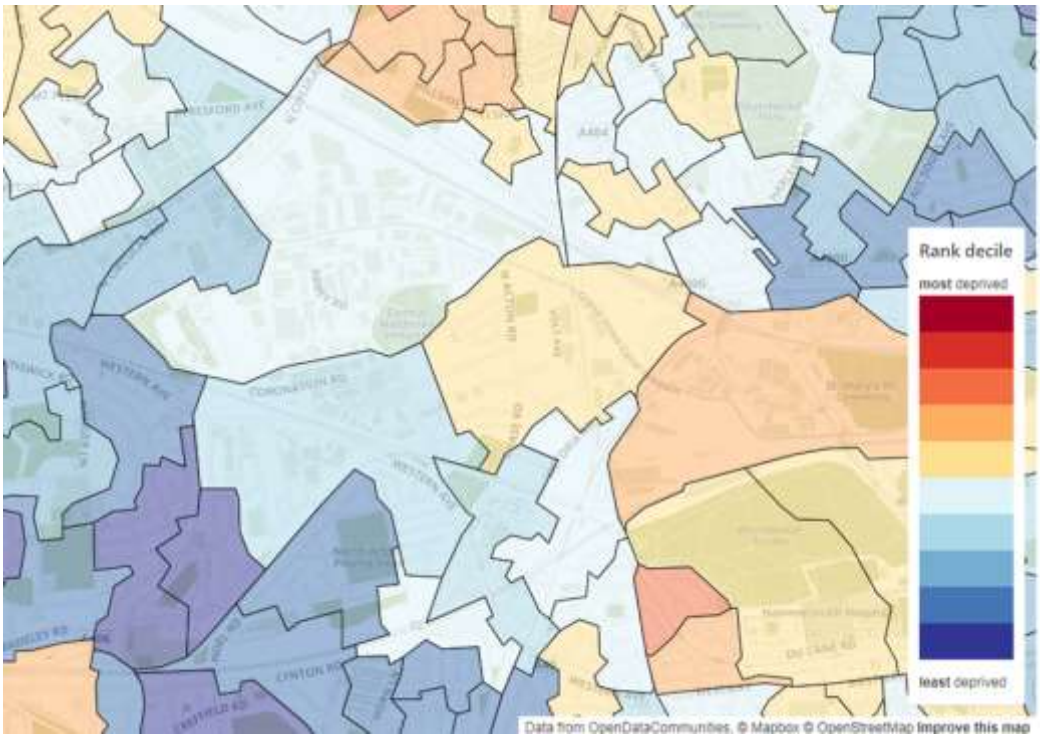
The percentage of people with no qualifications in 2011 was 16%. The percentage of people with NVQ Level 4 qualification or above was 36.5% compared with 44.7% for Inner London and 27.4% for England.

Table C2-1 Percentage of the population and level of qualification achieved

Area	All Student Age	No Qualifications	Level 1	Level 2	Apprenticeship	Level 3	Level 4Above	Other
England & Wales	45,496,780	23%	13.3%	15.3%	3.6%	12.3%	27.2%	5.7%
England	42,989,620	22%	13.3%	15.2%	3.6%	12.4%	27.4%	5.7%
London	6,549,173	18%	10.7%	11.8%	1.6%	10.5%	37.7%	10.0%
Inner London	2,636,853	16%	8.5%	9.4%	1.0%	10.1%	44.7%	10.5%
Outer London	3,912,320	19%	12.3%	13.5%	2.1%	10.7%	33.0%	9.7%
Ealing	269,572	16%	9.9%	10.5%	1.4%	9.6%	37.0%	15.1%
Brent	248,458	19%	10.4%	10.9%	1.2%	9.7%	33.3%	15.4%
Hammersmith and Fulham	152,863	13%	7.0%	8.3%	1.2%	10.7%	49.6%	10.5%
Park Royal Total	3,931	16%	9.0%	9.9%	1.9%	9.0%	36.5%	17.4%

Source: Census 2011

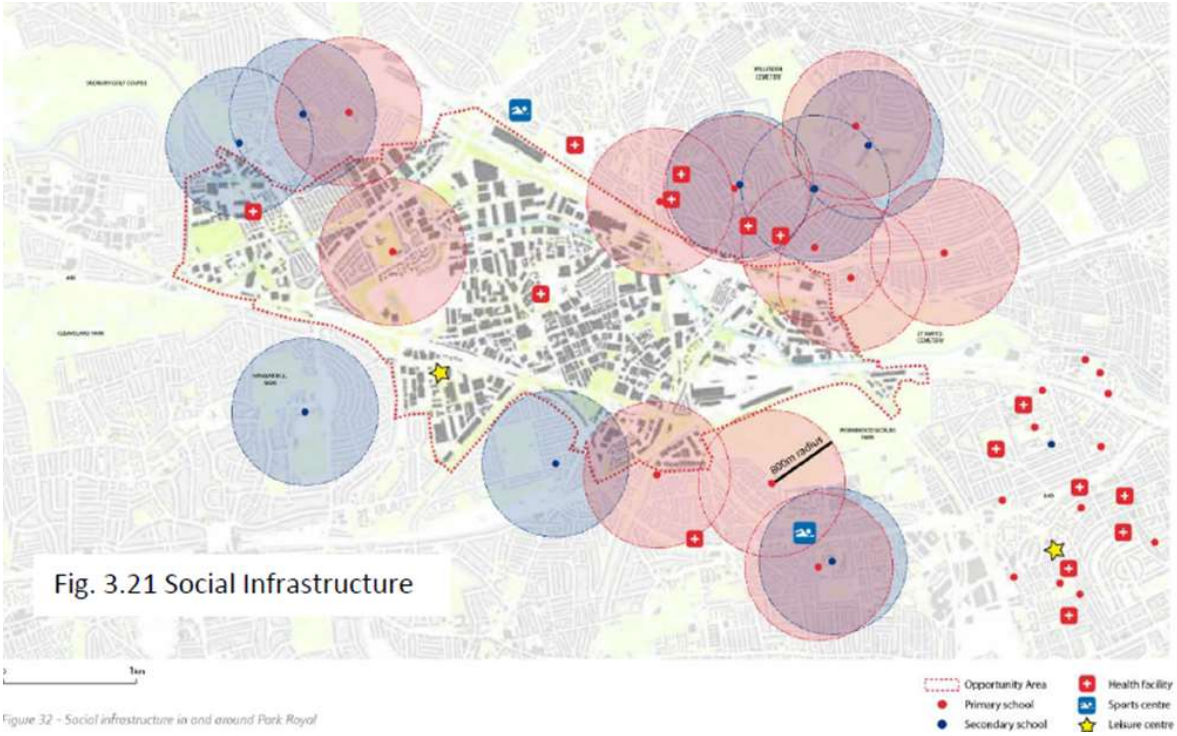
Figure C2-1 Education, Skills and Training Deprivation in OPDC



Source: Indices of Deprivation 2010 for England

Brent in particular has a higher percentage of at least one member of staff who isn't fully proficient at their job when compared to London and therefore the Local Plan should seek to include job skills training opportunities and further education facilities.

Figure C2-2 Education facilities adjoining OPDC Area



Source: OAPF Draft IIA Report, GLA, February 2015

As can be seen from **Figure C2-2** there is a gap in education facilities within the area. The Local Plan and future development needs to ensure adequate provision for the new residents and existing alike.

C.2.2 Data Gaps and Uncertainties

- Accessibility to secondary school education.
- Number and location of establishments offering life-long learning opportunities.

C.3 Health

The following baseline data has been used to identify key trends:

- Census 2011 health status data
- Census 2011 life expectancy
- Children living in poverty
- Childhood obesity rates
- Health Deprivation and Disability (Indices of Deprivation for England 2010)
- Provision of GPs and Healthcare

It is noted that a number of the other topics within this baseline will also have an influence on health levels, including data on: population, education, air quality, noise, crime, employment, deprivation and living environment, housing, biodiversity and open space (landscape and townscape).

C.3.1 OPDC Area

The health of people in the OPDC area is relatively good – 51.6% state they are in Very Good Health (see **Figure C3-1**). Deprivation is higher than average and 37.5% of children were living in poverty in 2010. Life expectancy for males in is 76.2% years, which was lower than the average for London. The average life expectancy for females was 83.6 years which is higher than the London average (82.8%). 8.6% of births between 2008 and 2012 were low birth weight births, which compares with a 7.4% nationally.

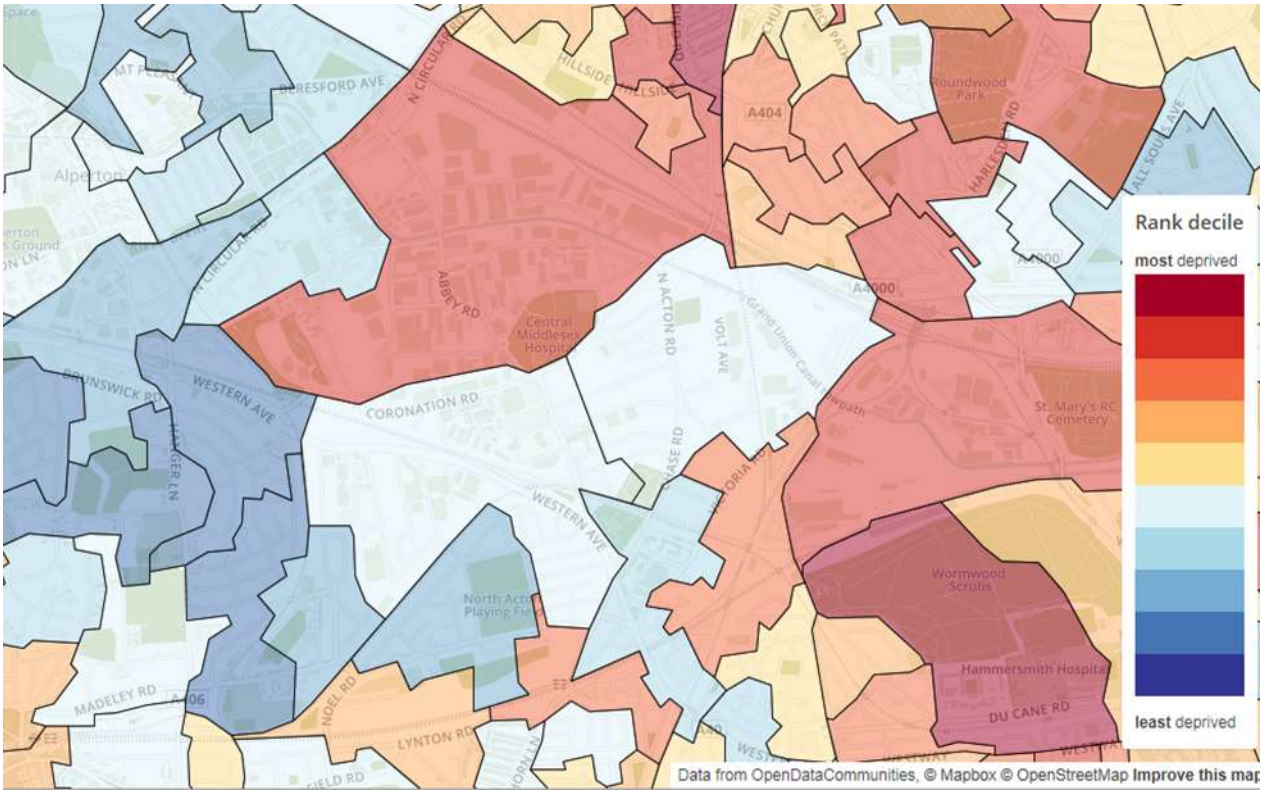
During the period 2010/11 and 2012/13, 11.8% of children at reception year were considered obese, with an additional 23.6% carrying excess weight. A further 23.6% of children in year 6 were identified as obese, with the same figure for London recorded at 22.5%.

Table C3-1 Census 2011 Health

Area	Total	Very Good Health	Good Health	Fair Health	Bad Health	Very Bad Health
England and Wales	56,075,912	47.1%	34.1%	13.2%	4.3%	1.3%
England	53,012,456	47.2%	34.2%	13.1%	4.2%	1.2%
London	8,173,941	50.5%	33.3%	11.2%	3.7%	1.2%
Inner London	3,231,901	52.6%	31.6%	10.5%	3.9%	1.4%
Outer London	4,942,040	49.1%	34.5%	11.7%	3.6%	1.1%
Ealing	338,449	49.2%	34.5%	11.4%	3.8%	1.2%
Brent	311,215	48.1%	34.8%	11.8%	4.0%	1.4%
Hammersmith and Fulham	182,493	56.5%	29.2%	9.4%	3.6%	1.3%
Park Royal & Old Oak	4,941	51.6%	33.9%	9.6%	3.9%	0.9%

The OPDC area includes at least one LSOA in the bottom 20% for health deprivation and disability; see **Figure C3-1** below.

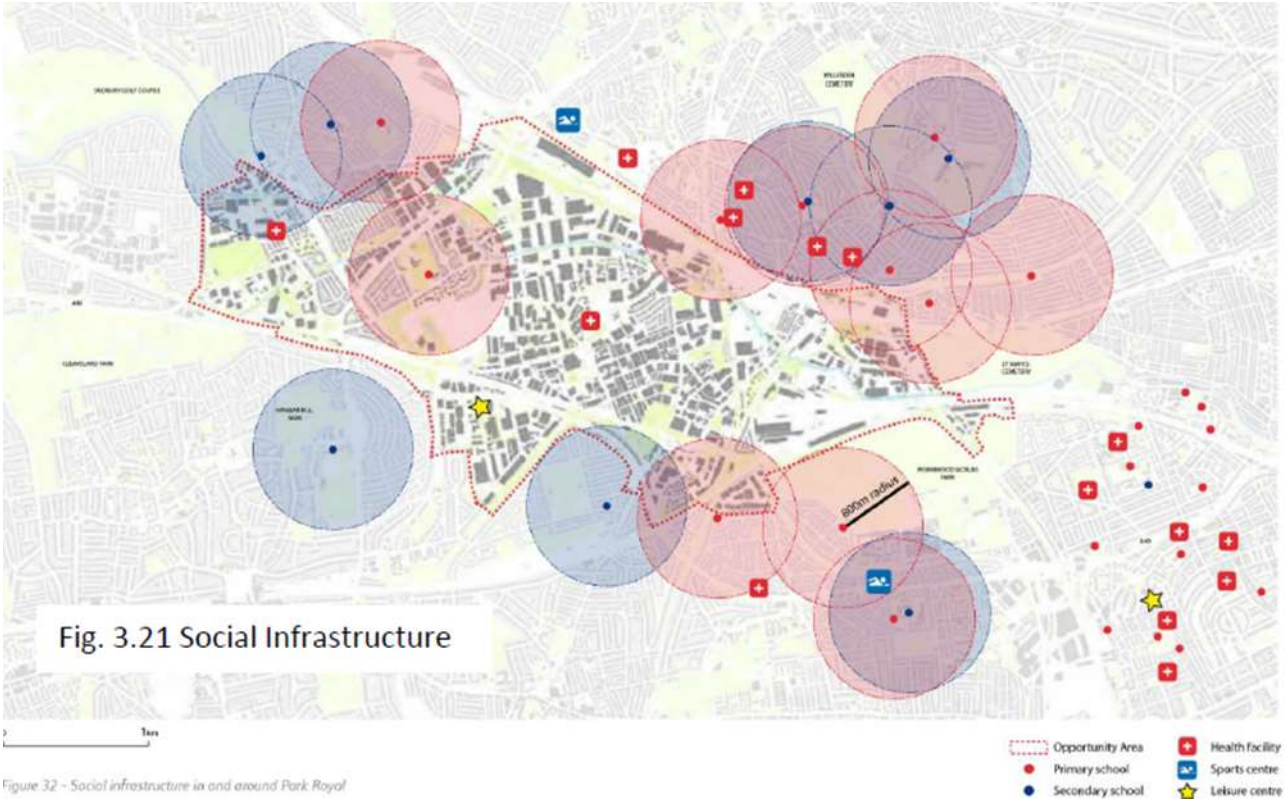
Figure C3-1 Health Deprivation and Disability in OPDC



Source: Indices of Deprivation 2010 for England

Due to its industrial nature and history, there is a lack of primary care facilities within the OPDC boundaries, with the exception of Middlesex Hospital, as seen from **Figure C3-2**.

Figure C3-2 Provision of GPs and Healthcare in OPDC



Source: OAPF Draft IIA Report, GLA, February 2015

C.3.5 Data Gaps and Uncertainties

- Proportion of population in area with access to hospital / GP / Dentist
- How children travel to school
- Play and open space quality, quantity and accessibility
- Further detailed information on disability and accessibility throughout the OPDC area and its buildings

C.4 Crime

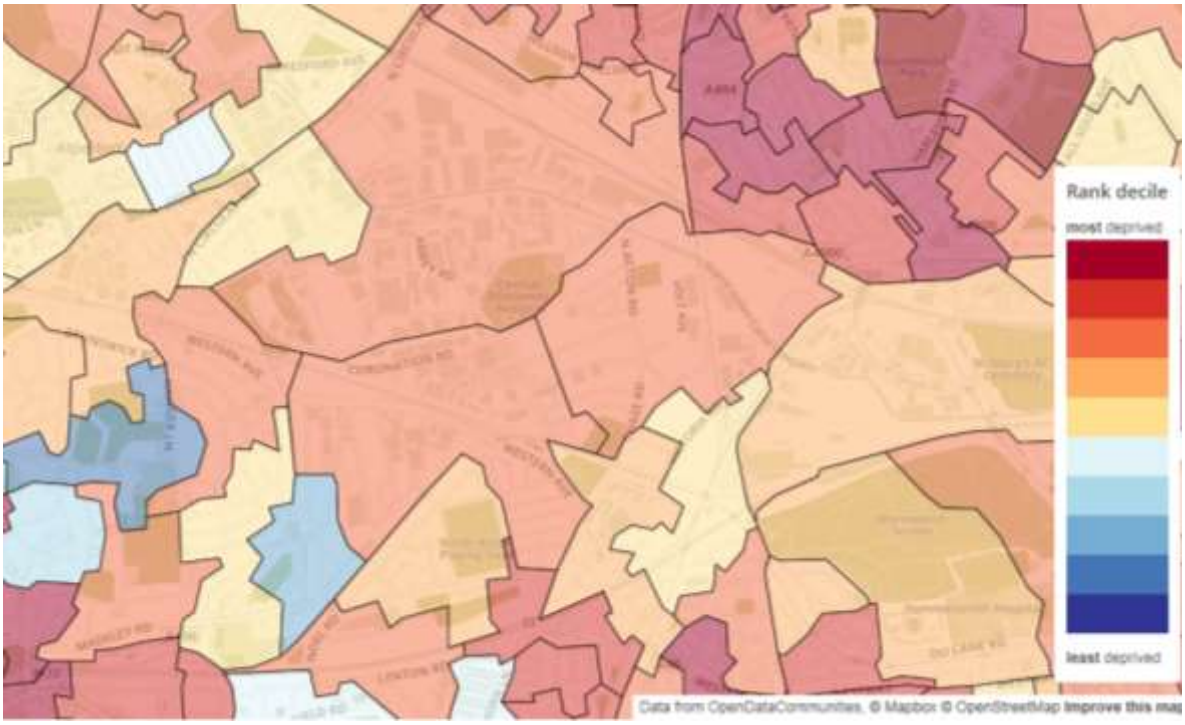
The following baseline data has been identified:

- Crime rates (Indices of Deprivation).
- Car theft
- Violence against persons (rank)
- Total Crime (rank)

C.4.1 OPDC Area

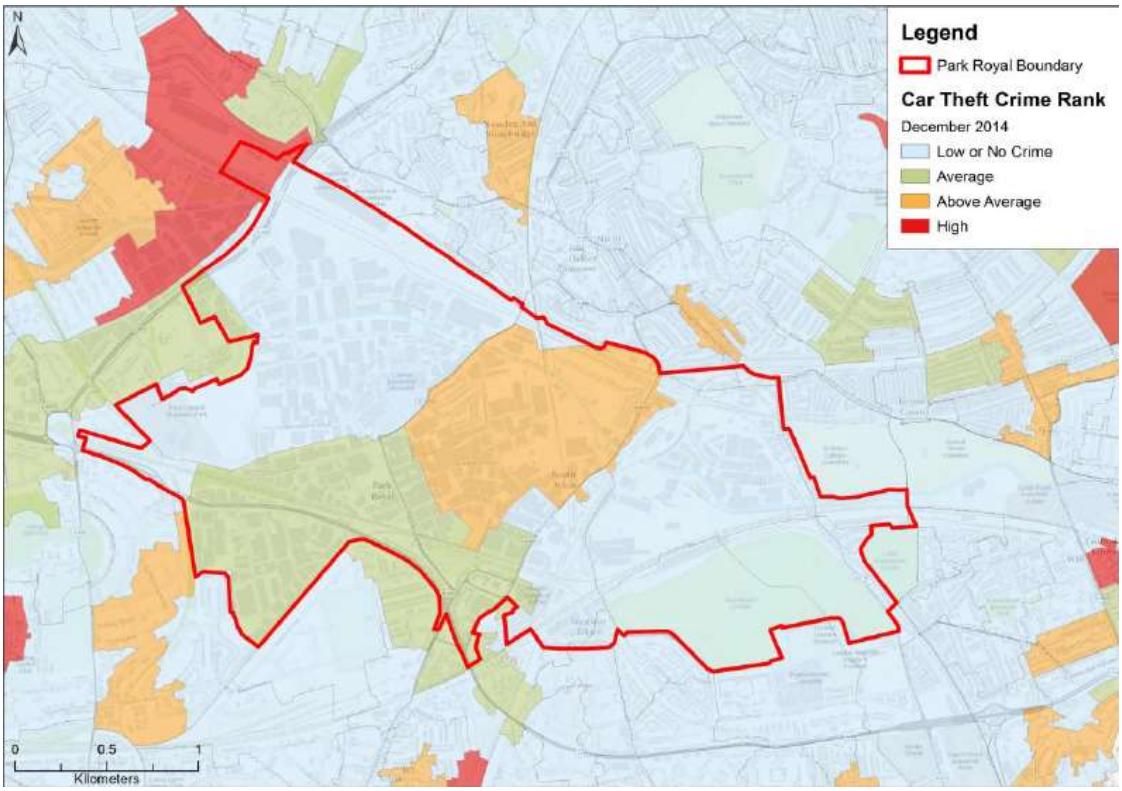
Crime in and around the OPDC area is predominantly violent crime or anti-social behaviour offences. The area is one of the more deprived areas of the country in terms of crime.

Figure C4-1 Crime Deprivation in OPDC



Source: Indices of Deprivation 2014

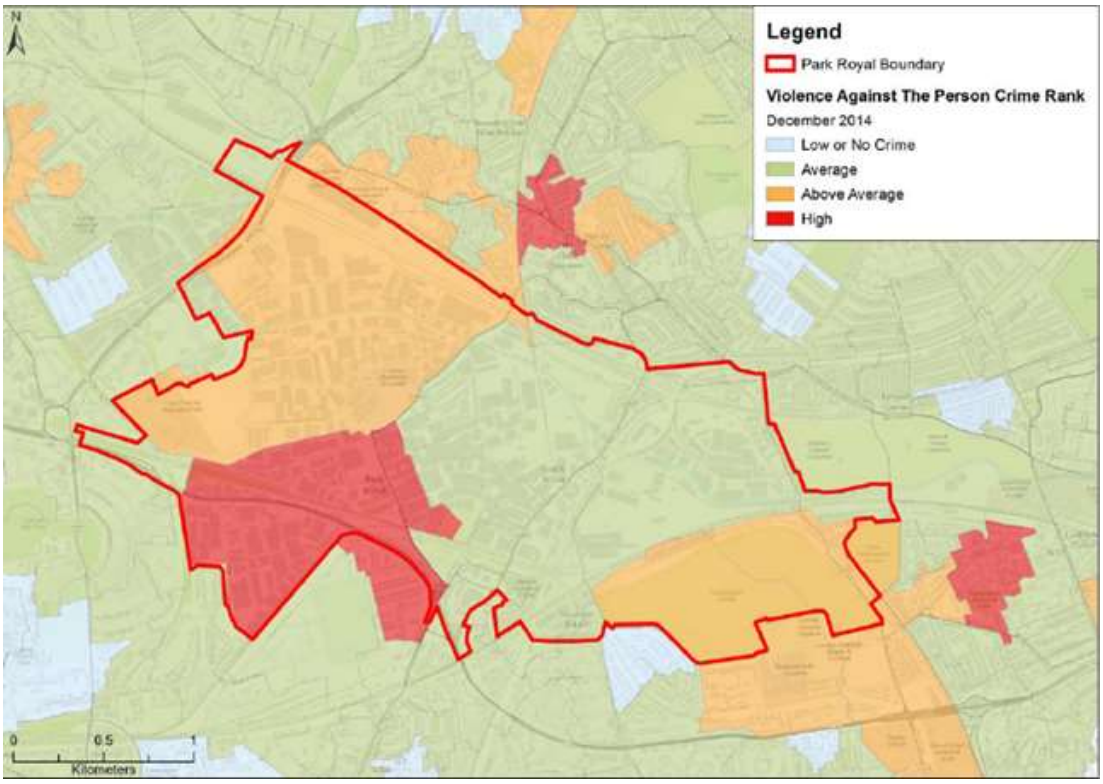
Figure C4-2 Car Theft



Source: OAPF Draft IIA Report, GLA, February 2015

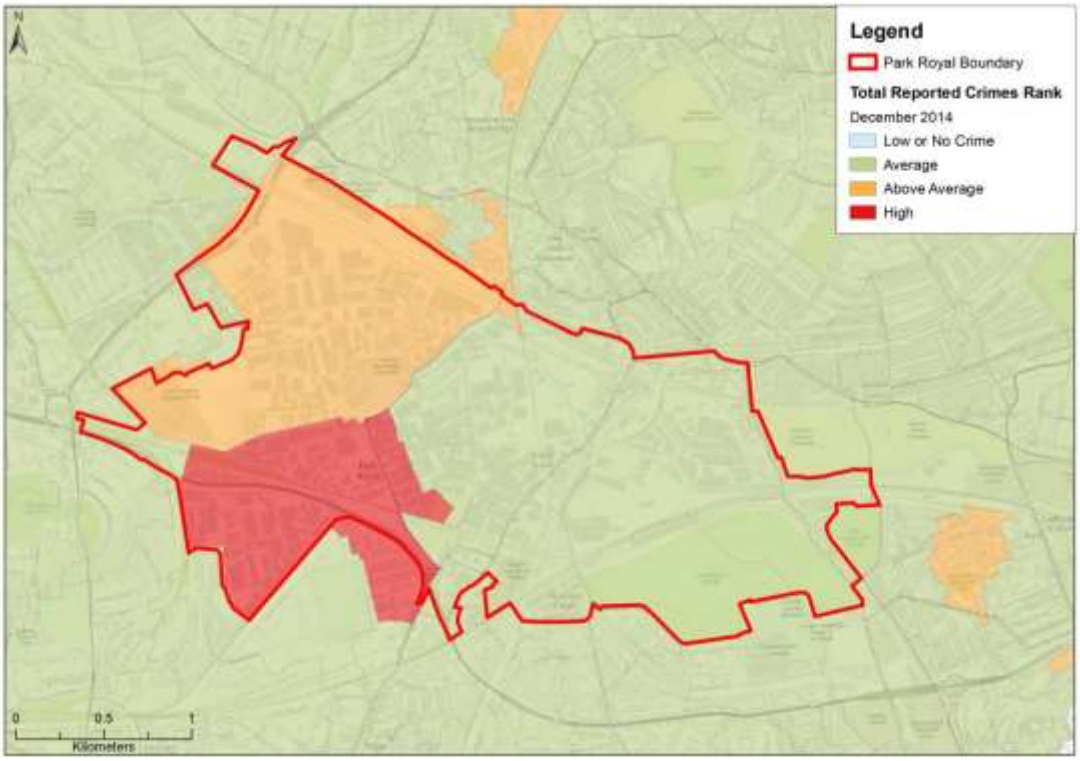
Car theft is average or above average in the centre of the OPDC (see **Figure C4-2**). Violence against persons is alo high or above average in the majority of the OPDC area. Given the industrial nature of the site, the Local Plan should seek to ensure that the design new development improves the safety and perceived safety of the community and their property.

Figure C4-3 Violence against Persons



Source: OAPF Draft IIA Report, GLA, February 2015

Figure C4-4 Total Crime Rank



Source: OAPF Draft IIA Report, GLA, February 2015

C.4.2 Data Gaps and Uncertainties

- Percentage of people who feel safe in the place where they live
- Percentage of people who feel safe travelling on public transport at night
- How to best incorporate influx of population

C.5 Water

The following baseline indicators have been used to characterise the water environment within in the OPDC area:

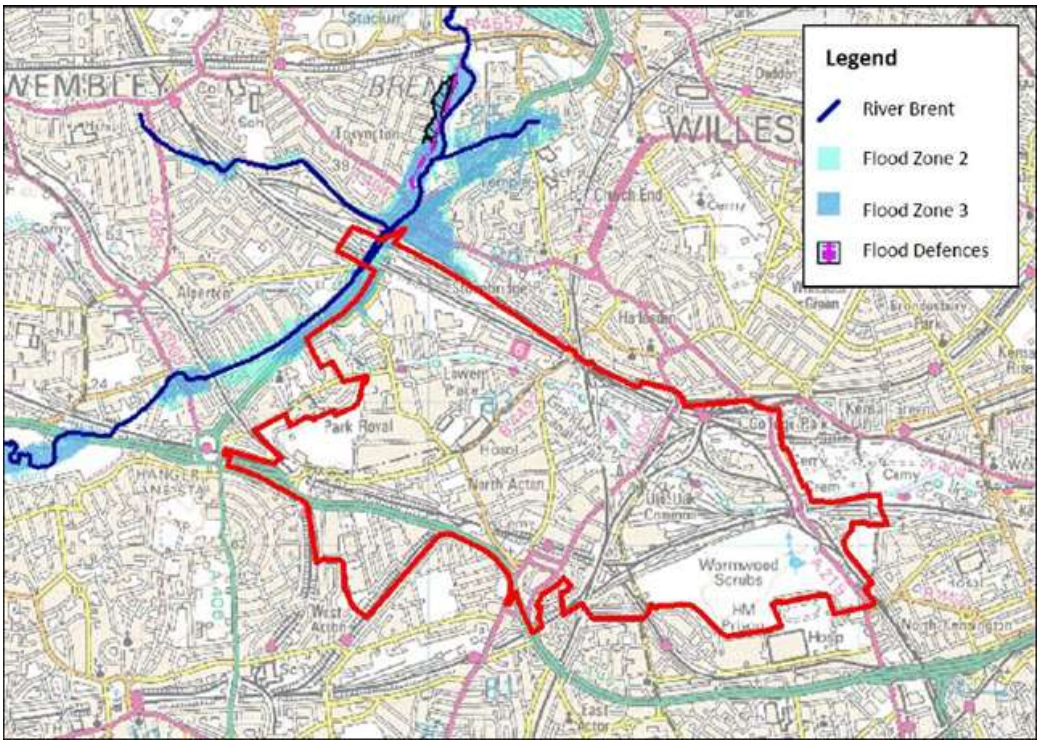
- River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009)
- Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map)
- Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map)
- Water and groundwater quality (Environment Agency).

C.5.1 OPDC Area

Water is an essential resource required for both domestic and industrial use. The study area's western boundary follows the lie of the River Brent and the Grand Union Canal runs from west to east of the area.

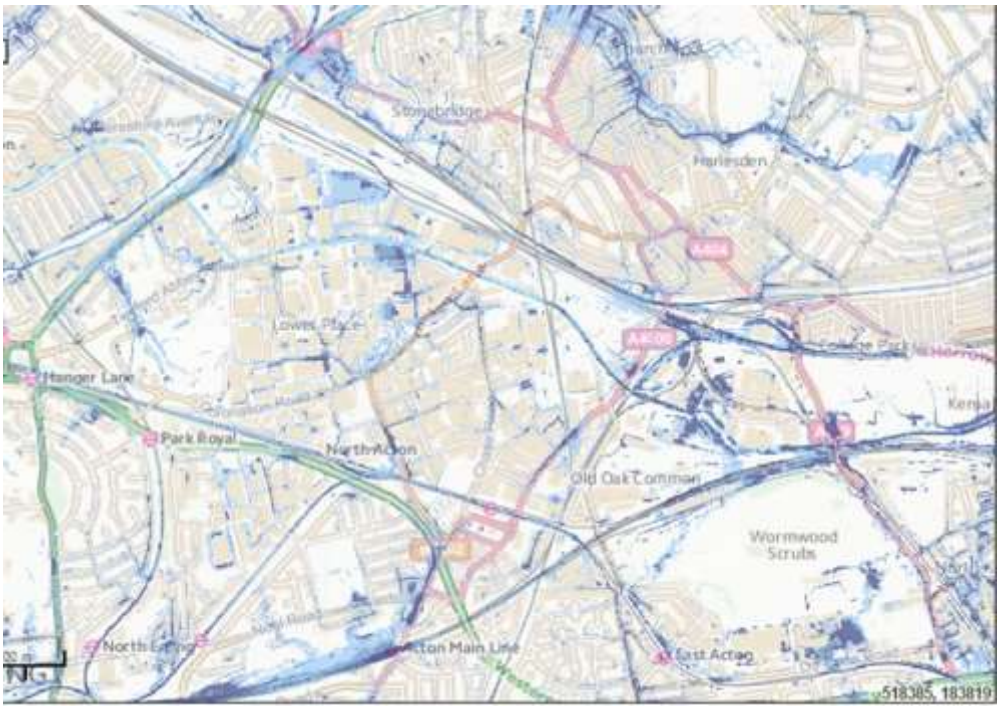
The main source of flood risk to the area lies fluvial flood risk at its western edge and from surface water puddling along the road network of area (Figures C5-1 and C5-2). There is particular risk around Old Oak Common station and the area immediately to the north of Middlesex Hospital in Park Royal. Fluvial flooding is associated with the River Brent. There are small areas of Flood Zone 2 and 3 in the north-western corner of the area.

Figure C5-1 Fluvial Flood Risk



Source: Environment Agency Flood Map

Figure C5-2 Surface Water Flood Risk in OPDC



Source: Environment Agency Flood Map

Each Londoner on average consumed 161 litres of water per day compared to the England and Wales average of 149 litres per day. In the past 20 years, Thames Water has seen a 15% increase in water usage throughout London. This is equivalent to an increase of 10 litres per person per decade.

Both River Brent and Grand Union Canal are currently characterised as having poor water quality for their chemical and biological makeup. The Thames RBMP Actions for the Lower Brent indicate a desire to provide fish easement for three weirs between Brent Junction and Queensbury Road. Development with within the OPDC area could contribute to an improvement in the watercourses' water quality overall.

C.5.2 Data Gaps and Uncertainties

- Further objectives could be identified from adjoining Borough's Surface Water Management Plan
- Thames Water have indicated that Counters Creek is at capacity for any new influx into the combined sewer system – but formal assessment has not been identified.

C.6 Soil and Land Quality

The following baseline indicators have been used to characterise the soil and land quality conditions across the borough and within the four London boroughs:

- Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles).
- Number of active / historic landfills on the site (Environment Agency)

C.6.1 OPDC Area

The 2010 ONS Local Profile in **Table C6-1** highlights the amount of previously developed land available in the three boroughs that make up the Old Oak and Park Royal Development Corporation. This reflects the high density urban environment of the borough.

Table C6-1 Previously Developed Land

	Vacant land Hectares	Vacant buildings Hectares	Derelict land and buildings Hectares	Land currently in use with known redevelopment potential Hectares	Land that is unused or may be available for redevelopment Hectares
Ealing	0	0	0	0	140
Hammersmith and Fulham	0	10	0	0	100
Brent	0	20	30	10	150
London	640	330	270	340	3,660

Source: ONS Local Profiles

According to the Environment Agency website there is one historic landfill within the area boundary (Twyford Service Station). The last waste received at this site was in 1968. However there are other sites, particularly within Old Oak which will need to be relocated and the waste apportionment dealt with due the proposed change in land use of the area.

C.6.2 Data Gaps and Uncertainties

- Area of contaminated land returned to beneficial use

- Type of contaminants within the OPDC area
- Extent of current and historic waste sites and waste transfer sites

C.7 Air Quality

The following baseline indicators have been used to identify environmental conditions and key trends:

- Number and distribution of Air Quality Management Areas (AQMAs) (Air Quality Archive[13])
- Monitoring data for NO_2 and PM_{10}

C.7.1 OPDC Area

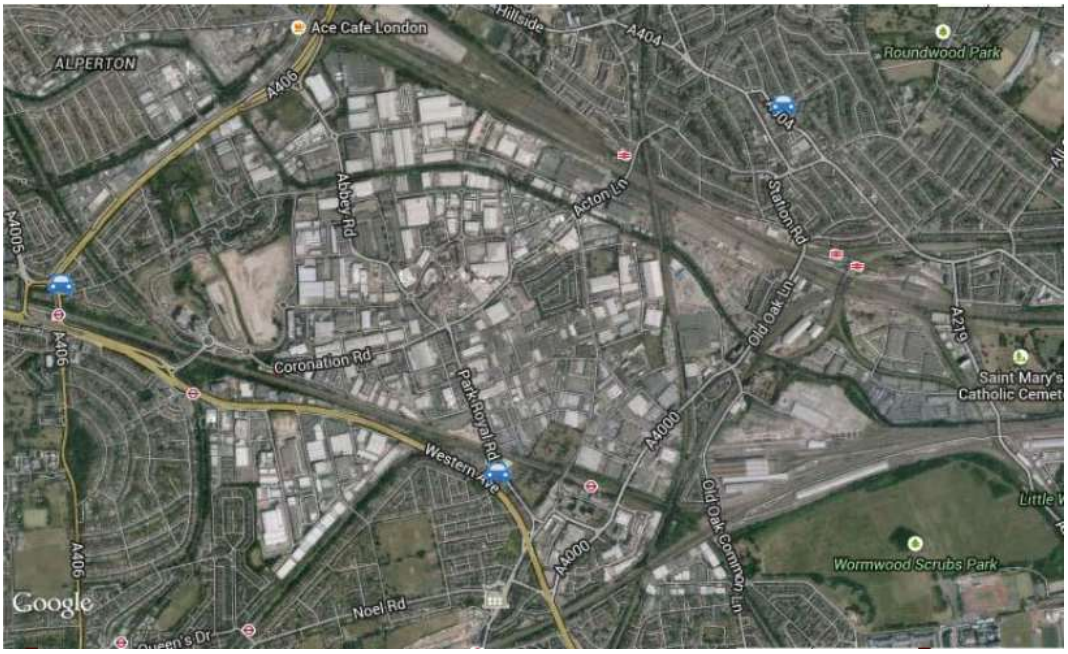
The principal threat to clean air in London comes from road traffic. Poor air quality can damage people's health and quality of life. It can pose particular problems for vulnerable groups such as the elderly, young children and people suffering from respiratory diseases.

AQMAs are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. The whole of the OPDC area is considered to be within an AQMA for levels of NO_2 and $PM_{10.}$ Each of the three boroughs have identified the same exceedances and types of pollutants.

There are three monitoring sites though only two are within the OPDC boundary itself as shown in **Figure C7-1**. Hanger Lane Gyratory (Ealing) Air Quality monitoring Station in operation since 2003 and Western Avenue Air Quality Monitoring Station in operation since 2010 are roadside stations located at the southern boundary of the OA and are operated to LAQN standards. The highest recorded annual mean (see **Figure C7-3**) (1st January 2014 – 1st January 2015) of Nitrogen Dioxide (NO_2) concentration was measured at Hanger Lane Gyratory ($67.6_{\mu g/m3}$) followed by Western Avenue at $64.367.6_{\mu g/m3}$ both exceeding the objective mean of $40_{\mu g/m3}$. There are areas of high NO_2 concentrations in the OPDC area, particularly along the strategic highway network.

[13] http://uk-air.defra.gov.uk/aqma/maps

Figure C7-1 AQMA in the OPDC



Source: Defra

Figure C7-2 AQMA Objectives

National air quality objectives and European Directive limit and target values for the protection of human health							
Pollutant	**Applies**	**Objective**	**Concentration measured as[10]**	**Date to be achieved by and maintained thereafter**	**European obligations**	**Date to be achieved by and maintained thereafter**	**New or existing**
Particles (PM_{10})	UK	50µg.m^{-3} not to be exceeded more than 35 times a year	24 hour mean	31 December 2004	50µg.m^{-3} not to be exceeded more than 35 times a year	1 January 2005	Retain existing
	UK	40µg.m^{-3}	annual mean	31 December 2004	40µg.m^{-3}	1 January 2005	
	Indicative 2010 objectives for PM_{10} (from the 2000 Strategy and 2003 Addendum) have been replaced by an exposure reduction approach for $PM_{2.5}$ (except in Scotland – see below)						
	Scotland	50µg.m^{-3} not to be exceeded more than 7 times a year	24 hour mean	31 December 2010			Retain existing
	Scotland	18µg.m^{-3}	annual mean	31 December 2010			
Particles ($PM_{2.5}$) Exposure Reduction	UK (except Scotland)	25µg.m^{-3}	annual mean	2020	Target value 25µg.m^{-3} [12]	2010	New (European obligations still under negotiation)
	Scotland	12µg.m^{-3}		2020	Limit value 25µg.m^{-3}	2015	
	UK urban areas	Target of 15% reduction in concentrations at urban background[11]		Between 2010 and 2020	Target of 20% reduction in concentrations at urban background	Between 2010 and 2020	
Nitrogen dioxide	UK	200µg.m^{-3} not to be exceeded more than 18 times a year	1 hour mean	31 December 2005	200µg.m^{-3} not to be exceeded more than 18 times a year	1 January 2010	Retain existing
	UK	40µg.m^{-3}	annual mean	31 December 2005	40µg.m^{-3}	1 January 2010	
Ozone	UK	100µg.m^{-3} not to be exceeded more than 10 times a year	8 hour mean	31 December 2005	Target of 120µg.m^{-3} not to be exceeded more than 25 times a year averaged over 3 years	31 December 2010	Retain existing

Source: Defra

Figure C7-3 Air Quality Monitoring data 1st January 2014-1st January 2015

	Nitrogen Dioxide NO2	Particles PM10
Ealing - Western Avenue	64.3	29.3
Ealing - Hanger Lane Gyratory	67.6	25.4
Brent - John Keble Primary School	N/A	21.9

Source: OAPF Draft IIA Report, GLA, February 2015

C.7.2 Data Gaps and Uncertainties

- Extent to which new development should adhere to the Mayor's Air Quality Neutral benchmark.
- How existing business can reduce reliance on road freight traffic with introduction of rail improvements

C.8 Energy and Climate Change

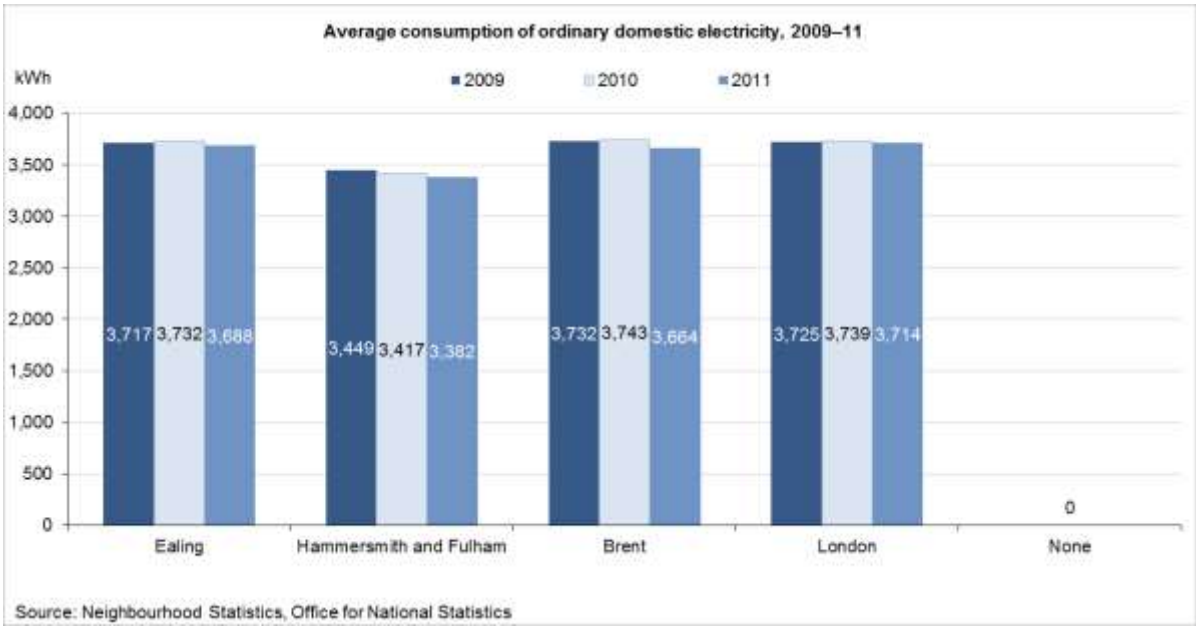
The following baseline indicators have been used:

- Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles).
- All energy consumption by sector (Office for National Statistics Local Profiles and DECC).

C.8.1 OPDC Area

Although climate change is a global phenomenon, action to avoid its most serious effects and to minimise the emission of greenhouse gases needs to occur at a local level. The area will not be immune to the impacts of climate change, either directly or as a result of policy responses at the national and international levels.

Table C8-1 Average consumption of ordinary domestic electricity



Source: ONS Local Profiles

The three boroughs perform similarly when compared to London and each other for average consumption domestic electricity. The scale of development should seek to encourage as energy efficient development as possible, as well as consider the positive benefit of a site-wide decentralised energy network.

Table C8-2 Energy Consumption by Sector

Energy consumption by sector
2011

	Total gWh	Industry and commercial gWh	Domestic gWh	Transport gWh
Ealing	5,127	1,746	2,249	1,132
Hammersmith and Fulham	3,198	1,386	1,227	586
Brent	4,037	1,199	2,044	794
London	134,347	50,341	55,547	28,178

Source: ONS Local Profiles

The Planning and Energy Act 2008 allows local authorities to include policies in their local plan's setting out reasonable requirements for:

- A proportion of energy used in development in their area to be energy from renewable sources
- A proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development

The above policies should be carefully considered and balanced in the Local Plan with the need to ensure that the environment of the borough is not adversely affected.

C.8.2 Data Gaps and Uncertainties

- Area specific energy data
- Greenhouse gas emissions data
- Levels of energy efficiency in homes and commercial buildings
- Energy consumption in industrial units within Park Royal and Old Oak

C.9 Biodiversity, Flora and Fauna

The following baseline indicators have been used to characterise conditions across the four boroughs and within the LLDC area boundary:

- Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Local Wildlife Sites (LWS) (MAGIC, www.magic.gov.uk and Local Authority websites).
- Key Biodiversity Action Plan (BAP) species and habitats present (London BAP).

C.9.1 OPDC Area

London is a surprisingly green city and approximately 48% is surfaced in vegetation, rivers and still waters. London supports thousands of species, from algae and fungi to molluscs and mammals

Within the OPDC area there are no SACs, SPAs, Ramsar sites, SSSIs or NNRs. There is one LNR: Wormwood Scrubs. The Grand Union Canal and adjacent area in Old Oak South is a

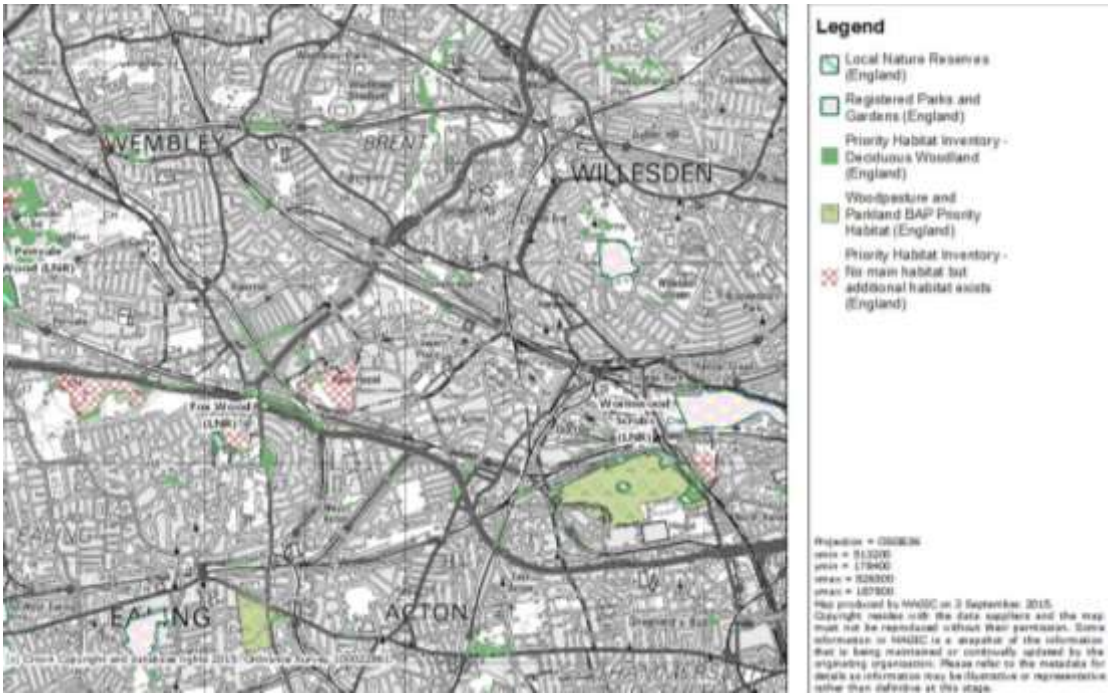
nature conservation area of Metropolitan Importance. Other designated sites in proximity to the plan area are listed in **Table C9-1**.

Table C9-1 Closest statutory sites of international, national and local nature importance

Site Name	Designation	Approximate direction and distance from the OPDC area
Wormwood Scrubs	LNR	Within OPDC boundary
Fox Wood	LNR	675 metres, southwest
Westbere Copse	LNR	3.4km, northeast
Barn Elms Wetland Centre	SSSI	4.4km, south
Richmond Park	SAC	6.9km, south
Wimbledon Common	SAC	8km, south

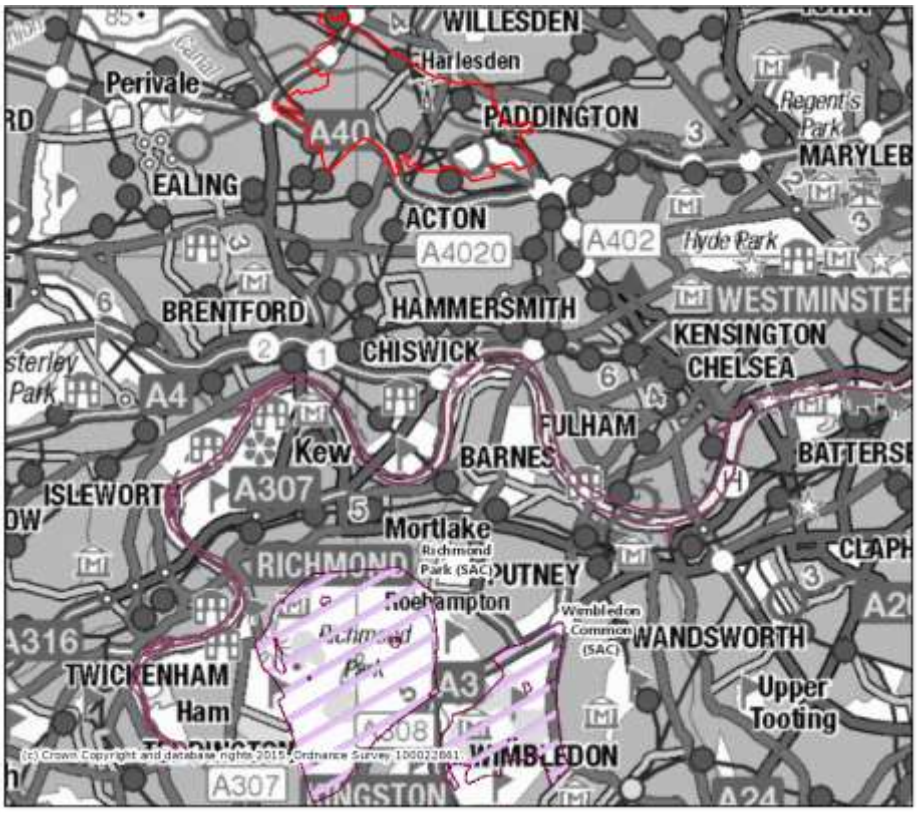
Wormwood Scrubs Local Nature Reserve's habitat and species should be protected and enhanced.

Figure C9-1 Designated Sites



Source: Magic.gov.uk, 4 August 2015

Figure C9-2 International Designations



Source: Magic.gov.uk, 4 August 2015

The area presents an opportunity to create and protect other sites within the boundary as well as promote green habitat connectivity to areas outside the boundary.

The UK government published ‘Biodiversity: The UK Action Plan’ in 1994. This plan combined new and existing conservation initiatives with an emphasis on a partnership approach. It contains 59 objectives for conserving and enhancing species and habitats as well as promoting public awareness and contributing to international conservation efforts. Following on from the initial strategy publication, 391 Species Action Plans (SAPs) and 45 Habitat Action Plans (HAPs) were published for the UK's most threatened (i.e. "priority") species and habitats. In additional there are approximately 150 Local Biodiversity Action Plans, normally at county level. These plans usually include actions to address the needs of the UK priority habitats and species in the local area, together with a range of other plans for habitats and species that are of local importance or interest (Biodiversity Action Reporting System[14]).

The London BAP is made up of many individual species and habitat plans. Each plan gives information on the status and threats to the species or habitat. London BAP species and habitats include the following:

Habitat Action Plans

- Acid grassland

[14] http://www.ukbap-reporting.org.uk/

- Chalk grassland
- Heathland
- Parks and urban greenspaces
- Private gardens
- Reedbeds
- Rivers and streams
- Standing water
- Tidal Thames
- Wasteland
- Woodland

Species Action Plans

- Bats
- Black poplar
- House sparrow
- Mistletoe
- Reptiles
- Sand martin
- Stag beetle
- Water vole

Source: London BAP[15]

C.9.2 Data Gaps and Uncertainties

- No records of other priority habitats and species within the boundary area
- Data relating to biodiversity on brownfield land/railway sidings in particular
- Data relating to the connectivity of greenspaces and the mapping of any greenspaces (non-designated) across the area

C.10 Cultural Heritage

The following baseline indicators have been used to characterise the heritage baseline:

- Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens[16].
- Historic England Heritage Assessment of Old Oak[17]

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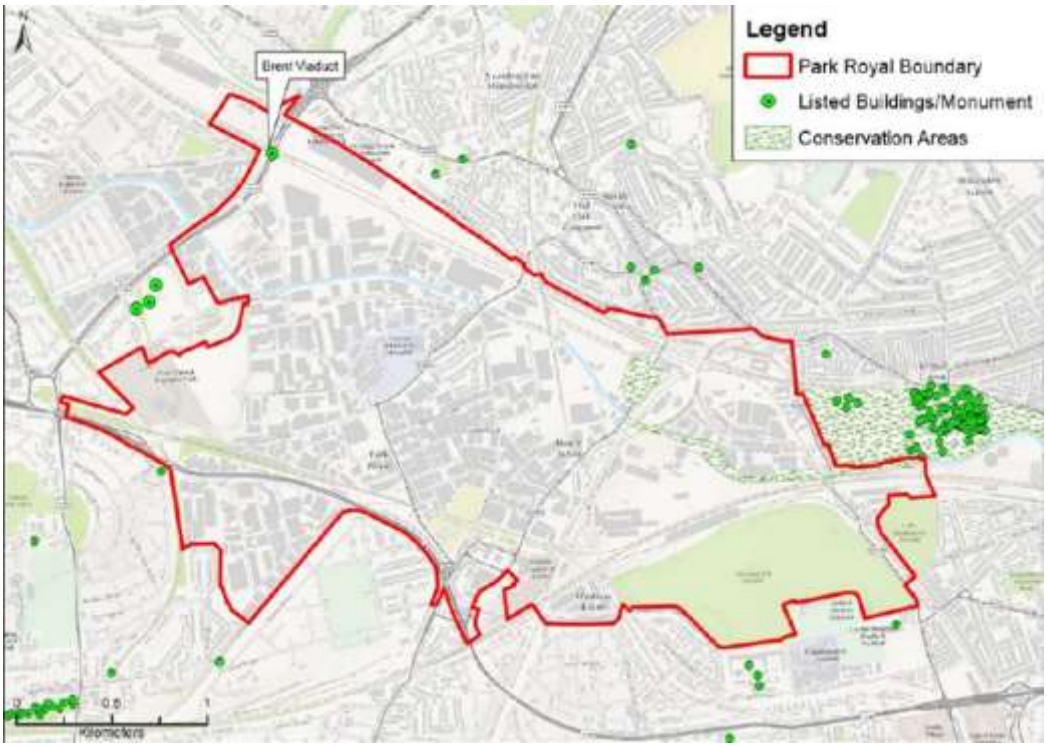
[15] http://www.lbp.org.uk/londonpriority.html

[16] www.magic.gov.uk

C.10.1 OPDC Area

There is one listed asset within the OPDC area – Brent Viaduct.

Figure C10-1Sites of Cultural and Archaeological Importance



Source: OAPF Draft IIA Report, GLA, February 2015

There are no SAMs within the area.

Within the boundary there are 2 Conservation Areas, these include:

- Old Oak Lane; and
- along Grand Union Canal.

Within the surrounding area, the following conservation areas may be affected by development within the OPDC area:

- Harlseden;
- St. Mary's;
- Old Oak and Wormholt;
- Hangerhill Garden Estate; and
- Hagerhill (Hay Mills) Estate.

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[17] http://research.historicengland.org.uk/redirect.aspx?id=6294

Prior to the mid-nineteenth century, Old Oak Common area was common-ground and farmland sitting beside the Grand Junction Canal (now the Grand Union Canal) from its development in 1794. With the arrival of the railways in 1838 and their expansion into the twentieth century, industry shortly followed along the railways and the canal making use of these connections. By the late nineteenth century, Old Oak Common had been transformed into an industrial area home to heavy industries and works supporting the railways.

Following the First World War, the increase in motorised transport saw the arrival of motor car production with Park Ward manufacturing Rolls Royce vehicles at its site on Hythe Road. In the latter half of the twentieth century, redevelopment of some of the Victorian industrial buildings for lighter industry and office floorspace was carried out reflecting the restructuring of the national economy.

To the west in Park Royal, the area generally known as Twyford was farmland until the Royal Agricultural Show took place between 1903 to 1905 (which provides the area's name). Following 1905, the industrial character began to emerge with the area used as a munitions factory during the First World War alongside manufacturing and food production. By 1932 there were 73 factories employing 13,500 workers which grew to over 45,000 in the 1960s following relatively light bomb damage in the Second World War and the post-war boom period. Through the latter part of the twentieth century, industrial restructuring saw the relocation of large multinational firms, such as Heinz, away from Park Royal.

Adjacent to the study area are the St. Mary's, Kensal Green Cemetery (Grade I registered Park and Garden of special historic interest which contains the Grade I listed Anglican Chapel, twelve Grade II* listed buildings or monuments and 147 Grade II listed buildings or monuments.). Other notable listed buildings whose setting could be affected by development in the Opportunity Area include the Grade II* listed gatehouse and chapel at Wormwood Scrubs Prison, the Church of All Souls Harlesden (also Grade II*), and thirteen Grade II listed buildings within 250m of the boundary. Further afield are Statutory Listed buildings, the closest being Kenmont Primary School and Park Royal Underground Station.

The Old Oak Common and Park Royal areas have a disparate assortment of railway and industrial heritage that play a valuable role in informing the evolving character of the area. Specific collections of non-designated heritage assets are located along the east of Scrubs Lane, the interwar Rolls Royce works and Acava Studios on Hythe Road. The OPDC would be seeking to designate and manage new Conservation Areas and a Local List.

A significant number of the heritage assets listed above are on English Heritage's Heritage at Risk Register. These include Kensal Green Cemetery, as well as 35 monuments within it, including the Anglican Chapel. Twyford Abbey to the west of the opportunity area is also a long standing Heritage at Risk case.

There are no archaeological priority areas within the study area.

C.10.2 Data Gaps and Uncertainties

- Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc.)
- Boroughs' Local Lists of Heritage Assets

C.11 Landscape and Townscape

The following baseline indicators have been used to characterise the landscape and townscape baseline:

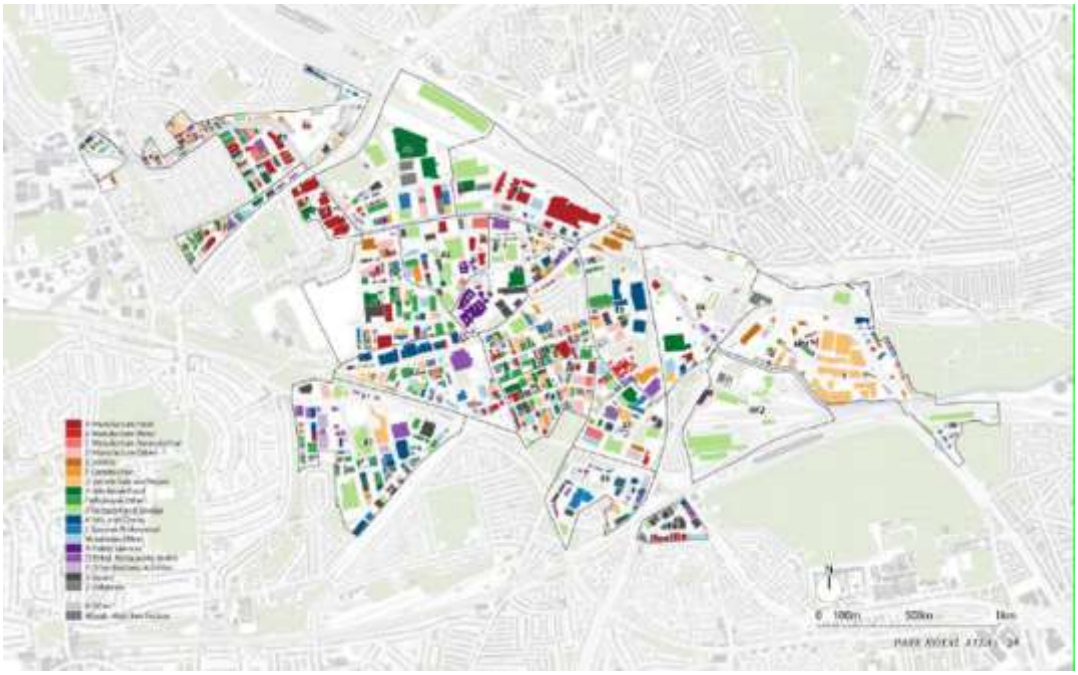
- Designated sites
- Land uses on the study area
- Conservation Areas
- Open Space

C.11.1 OPDC Area

There are no Areas of Outstanding Natural Beauty (AONBs) within OPDC.

The OPDC area comprises a largely industrial townscape with its edges influenced by more residential spaces. Railway infrastructure is a dominant feature across the site.

Figure C11-1 Land Uses in the Study Area



Source: OAPF Draft IIA Report, GLA, February 2015

The study area lies between two catchment areas – River Brent and the lost river of Counters Creek (now a combined sewer). Park Royal is predominantly warehousing and industrial units with Middlesex Hospital in the centre of it.

Old Oak is industrial units with the Cargiant site a dominant feature. At present a Crossrail depot is also being built there.

There is a Conservation Area along Old Oak Lane and along Grand Union Canal. The old Rolls Royce factory forms part of Old Oak.

Along the south-eastern boundary lies Wormwood Scrubs Park which is grassland and some woodland. The eastern boundary is Kensal Green Cemetery. While there are substantial areas of green space on the periphery of the plan area, the industrial nature of the area

means that most parts have a severe open space deficiency. Integration with the All London Green Grid Area Frameworks is an important consideration.

C.11.2 Data Gaps and Uncertainties

- Number of noise and light pollution complaints
- Percentage of new housing completions in area achieving design standards such as Building for Life and Lifetime Homes

C.12 Waste

The following baseline indicators have been used to characterise the existing conditions:

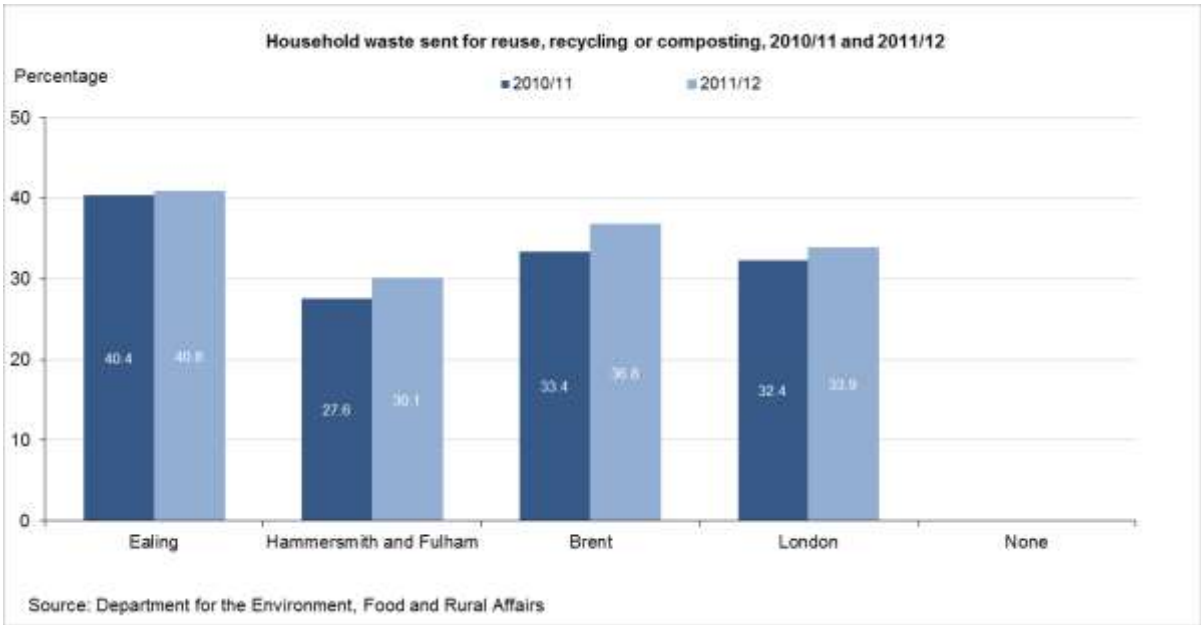
- Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles).
- Amount of residual waste per household (ONS).
- Amount of commercial and industrial waste produced (Defra).

C.12.1 OPDC Area

There are no area-specific statistics for the study area.

Recycling rates are higher for Ealing compared to Brent, Hammersmith & Fulham and London as a whole though they have increased between 2010 and 2012 (**Table C12-1**).

Table C12-1 Household Waste Sent for Reuse, Recycling or Composting



There is currently no data available on the municipal waste sent to landfill in the area.

There are several waste sites within the area:

- European Metal Recycling
- Powerday

- Capital Waste Ltd
- UK Tyre Exporters
- O'Donovan's Waste Disposal Ltd.

C.12.2 Data Gaps and Uncertainties

- Percentage of municipal waste sent to landfill in study area.
- Waste facilities available in each borough and how to deal with apportionment

C.13 Transportation

The following baseline indicators have been used to characterise the existing conditions across the borough:

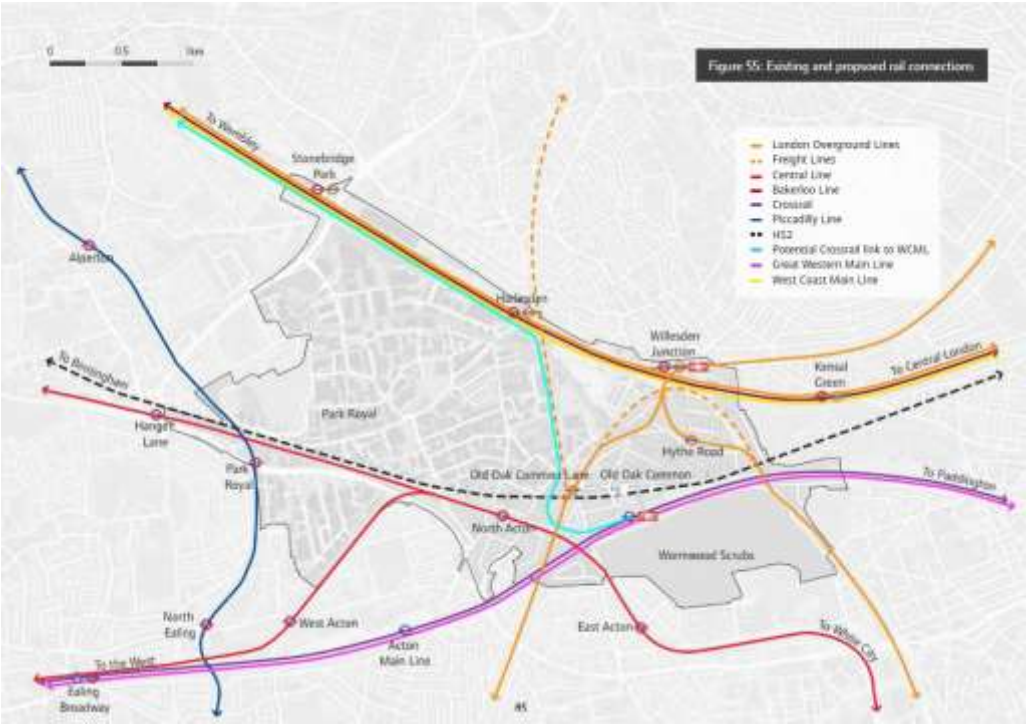
- Distribution of major transport systems – roads, rail links
- Draft Old Oak and Park Royal Opportunity Area Planning Framework, Transport Strategy, February 2015

C.13.1 OPDC Area

The Transport Strategy made a number of high level assumptions and modelled the impacts of area's proposals. It didn't take into account the transport impacts resulting from the relocation of existing activities. Further work is being explored to consider these elements. There is also a number of transport proposals identified which are contingent on land coming available which is likely to be beyond the 2031 timescales.

The new Old Oak Common station and surrounding interchange will be the key driver for development in the area and will be the focus of future transport connections. HS2 will provide 18 trains per hour between Old Oak and the North, with Birmingham Airport just 31 minutes from Old Oak. The new Crossrail station at Old Oak will provide up to 24 trains per hour into central London, as well as services towards Heathrow and Reading. The presence of a Crossrail station will be one of the most important transport connections to the site, providing a significant increase in rail capacity to the West End, City and Canary Wharf. Crossrail will provide excellent regional and sub-regional connectivity to Old Oak.

Figure C13-1 Transport Infrastructure at Old Oak

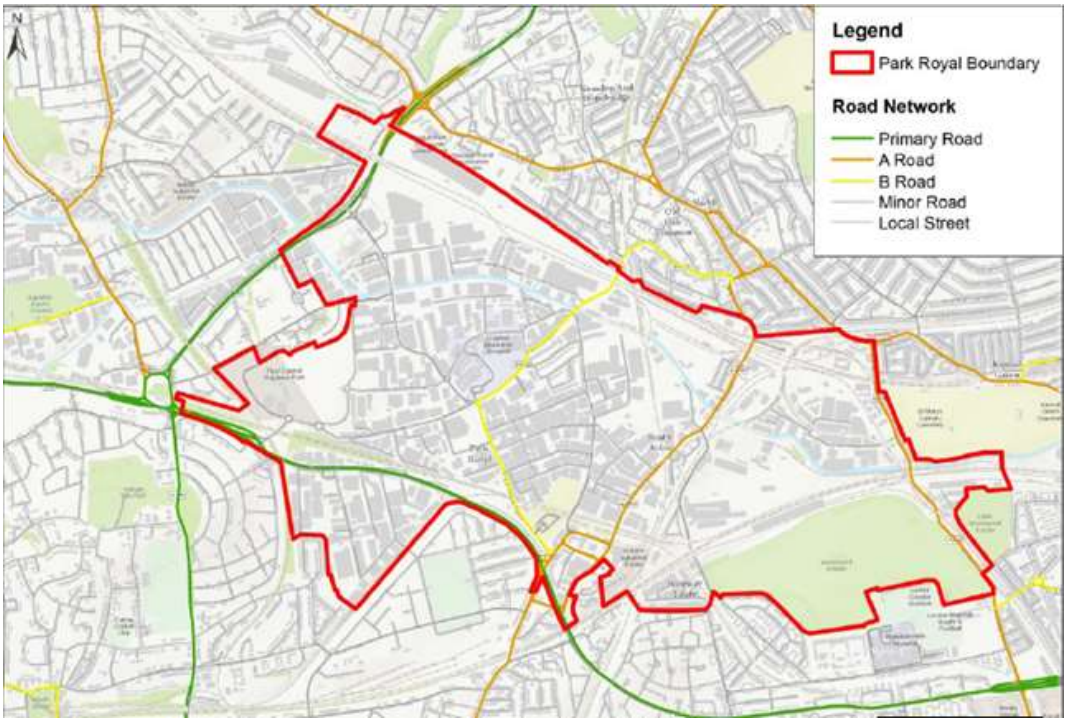


Source: OAPF Transport Strategy, GLA, February 2015

The study didn't consider the impacts of the number of homes being proposed nor the number of jobs. As such this needs careful consideration in the Local Plan.

Old Oak and Park Royal generate a significant number of road freight movements. The current road network is shown in **Figure C13-2**. Park Royal is home to London's largest industrial area and has significant wholesale, transport and warehouse activity. Any new proposals must consider the existing road users and capacity requirements, along with ensuring improvements in non-road transport, such as rail and by foot or cycle.

Figure C13-2 Road Network



Source: OAPF Draft IIA Report, GLA, February 2015

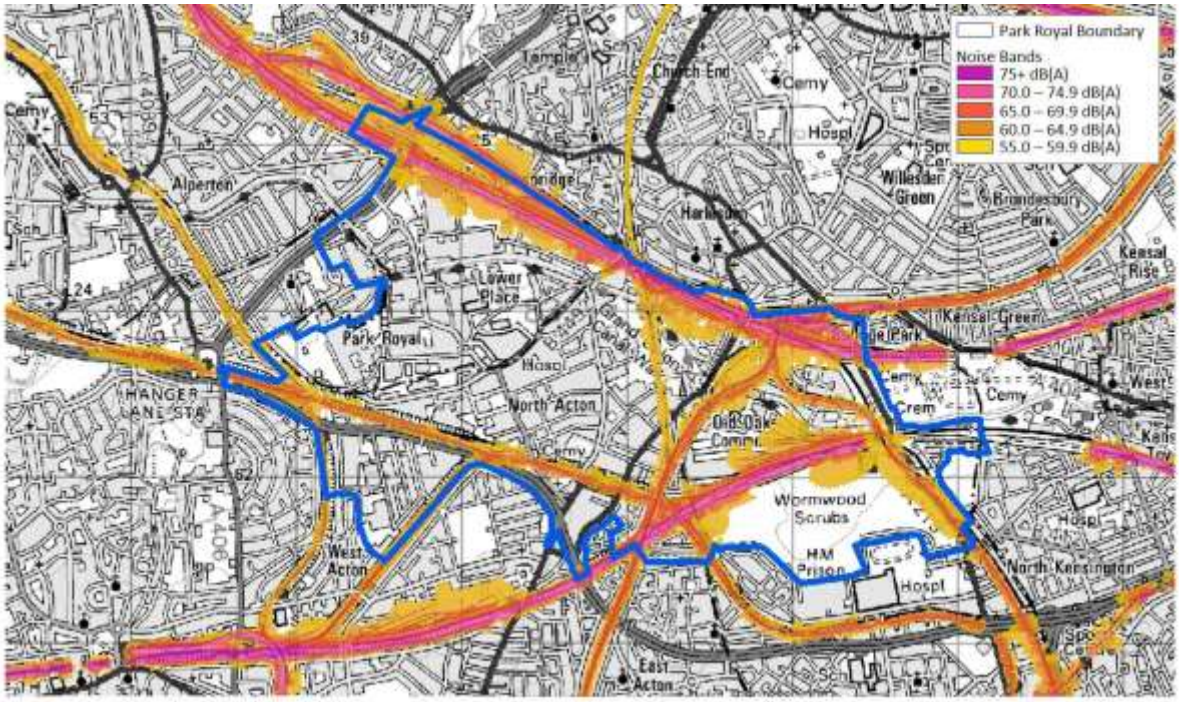
The Grand Union Canal presents a great opportunity for both water travel and freight movements as well as footpaths and should be considered a strategic transport link within the area.

Noise is defined as unwanted sound. Sensitive receptors to noise include residential areas, educational facilities, health care facilities and places of worship. Road and rail noise are significant contributors to the ambient noise environment, particularly around the town centre and main distributor roads. Department for Environment, Food and Rural Affairs (Defra) Online road, rail and industrial noise mapping shows the extent to which these noise sources may affect sensitive receptors. Built up areas shield unwanted sound and cause the effect to decrease over a short distance. Open areas such as parks allow the noise to travel over a longer distance and disturb users of such spaces.

Figure C13-3 Road Traffic Noise – average daytime

Source: www.services.defra.gov.uk/wps/portal/noise in OAPF Draft IIA Report, GLA, February 2015

Figure C13-4 Rail Noise – average daytime



Source: www.services.defra.gov.uk/wps/portal/noise in OAPF Draft IIA Report, GLA, February 2015

C.13.2 Data Gaps and Uncertainties

- Impacts on proposed quantum of development on existing businesses and residents in terms of access by road and rail

C.14 Economy

The following baseline indicators have been used to characterise economic conditions across the borough:

- Economy Local Profiles (ONS)
- Employment by industry (ONS- NOMIS).

C.14.1 OPDC Area

Smaller businesses, independent traders and entrepreneurs tend to dominate the study area. The image of Park Royal and Old Oak developments range from larger freight and wholesale businesses through to microbusinesses that survive because the area offers a place for their industry not available elsewhere in London coupled with inexpensive rents. On one hand while this can contribute to an entrepreneurial spirit, on the other it can translate into a weakness from an economic standpoint.

This is contributing towards pressure for redevelopment and regeneration. Redevelopment would help alleviate housing shortages in London but careful consideration needs to be given to how any new provision of retail will impact on other neighbouring town centres such as Ealing. Similarly, redevelopment of the area is likely to give rise to local pressures from existing businesses who are likely to be unwilling to relocate.

In 2010, 18.6% of the adult population were long-term unemployed (claiming job seekers allowance for over 1 year). This figure is above the national average of 10.1% and the London-wide figure of 11.5%.

A higher than average proportion of the area's population are classified in sales and customer service occupations, process plant occupations, elementary occupations and skilled trades compared to London as a whole. Professional occupations and associate professional and technical occupations however are lower than London's average but higher than regional and national averages. This data is presented in **Table C14-1**.

Table C14-1 Employment by Occupation Jul 2011-Jun 2012

Area	Total employed 16-74	Managers Directors Senior Officials	Professional Occupations	Associate_ ProfessionalTechnical Occupations	Administrative SecretarialOccupations	Skilled Trades_Occupations	Caring Leisure Other Service Occupations	Sales CustomerService Occupations	Process Plant and Machine Operatives	Elementary Occupations
England & Wales	26,526,336	10.8%	17.4%	12.7%	11.4%	11.5%	9.4%	8.4%	7.2%	11.1%
England	25,162,721	10.9%	17.5%	12.8%	11.5%	11.4%	9.3%	8.4%	7.2%	11.1%
London	3,998,897	11.6%	22.5%	16.3%	11.7%	8.3%	7.9%	7.5%	4.7%	9.6%
Inner London	1,637,362	12.4%	25.6%	19.7%	9.7%	6.3%	7.1%	6.6%	3.3%	9.4%
Outer London	2,361,535	11.0%	20.3%	13.9%	13.0%	9.7%	8.4%	8.1%	5.7%	9.8%
Ealing	164,820	10.9%	21.0%	14.2%	10.7%	9.9%	7.5%	7.9%	6.1%	11.8%
Brent	147,461	9.6%	18.2%	12.6%	10.9%	10.6%	8.2%	9.5%	6.9%	13.5%
Hammersmith and Fulham	99,618	14.6%	27.0%	22.1%	9.6%	5.4%	6.5%	5.5%	2.5%	6.7%
Park Royal & Old Oak	2,461	8.6%	19.1%	15.7%	11.5%	11.0%	7.4%	7.8%	6.2%	12.6%

Source: OAPF Draft IIA Report, GLA, February 2015

Table C14-2 Local Industry Units by Broad Industry Group

Area	England & Wales	England	London	Inner London	Outer London	Ealing	Brent	Hammersmith and Fulham	Park Royal & Old Oak
Employed Age 16-74	26,526,336	25,162,721	3,998,897	1,637,362	2,361,535	164,820	147,461	99618	2461
Agriculture/Forestry/Fishing	0.9%	0.8%	0.1%	0.1%	0.1%	0.0%	0.0%	0.1%	0.1%
Mining/Quarrying	0.2%	0.2%	0.1%	0.2%	0.1%	0.2%	0.1%	0.3%	0.2%
Manufacturing	8.9%	8.8%	3.2%	2.2%	3.9%	4.7%	4.6%	2.3%	3.9%
Electricity/Gas/Steam/Airconditioning Supply	0.6%	0.6%	0.3%	0.2%	0.3%	0.2%	0.2%	0.2%	0.1%
Water Supply/Sewerage/Waste Remediation Activities	0.7%	0.7%	0.4%	0.2%	0.4%	0.4%	0.3%	0.2%	0.3%
Construction	7.7%	7.7%	6.6%	4.4%	8.1%	7.9%	8.9%	4.0%	8.0%
Wholesale/Retail/Trade/Repair Motor Vehicles	15.9%	15.9%	13.1%	11.0%	14.5%	14.4%	17.0%	10.6%	15.5%
Transport Storage	5.0%	5.0%	5.0%	3.5%	6.1%	7.3%	5.7%	3.2%	6.8%
Accommodation & Food Service	5.6%	5.6%	6.3%	7.4%	5.5%	6.7%	7.9%	6.8%	9.2%
Info & Communication	4.0%	4.1%	6.9%	8.2%	6.0%	8.4%	6.3%	9.6%	7.3%
Financial/Insurance	4.3%	4.4%	7.7%	9.5%	6.4%	4.1%	4.4%	9.9%	3.5%
Real Estate	1.4%	1.5%	2.0%	2.1%	1.9%	1.8%	1.8%	2.9%	2.5%
Professional Scientific Technology	6.6%	6.7%	10.9%	14.1%	8.6%	8.8%	8.4%	16.1%	7.8%
Administrative Support Service	4.9%	4.9%	5.9%	5.9%	5.8%	6.8%	6.6%	5.4%	6.4%
Public Administration/ Defence	6.0%	5.9%	5.0%	4.3%	5.5%	3.8%	3.6%	3.0%	3.3%
Education	9.9%	9.9%	9.6%	9.2%	9.9%	9.0%	8.1%	8.2%	8.7%
Health	12.5%	12.4%	10.7%	10.1%	11.2%	9.8%	10.3%	9.4%	10.1%
Other: Other	5.0%	5.0%	6.4%	7.4%	5.7%	5.7%	6.0%	7.6%	6.5%

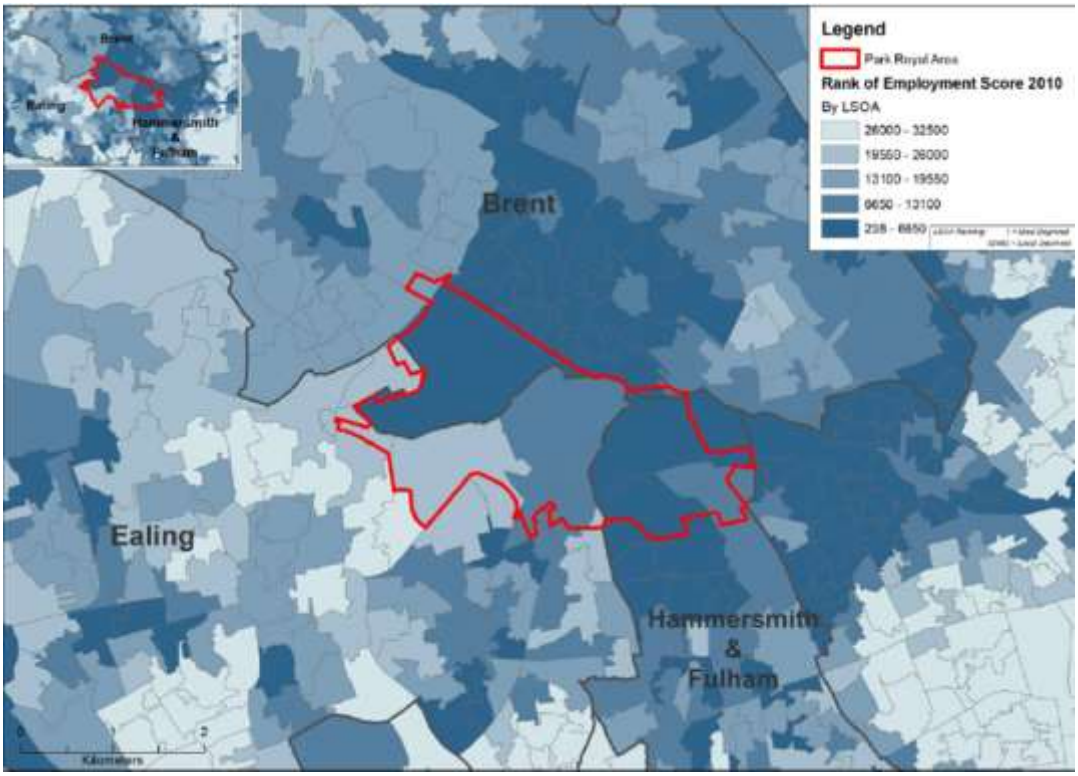
Source: OAPF Draft IIA Report, GLA, February 2015

Table C14-2 shows the employment by industry in the study area and surrounding boroughs. There's a higher than the London average of manufacturing, construction, wholesale and accommodation & food services within the Park Royal and Old Oak study area.

These more intensive industries need to be accommodated in terms of the proposed redevelopment whilst also allowing new industries to flourish – especially by providing space for green technologies.

The area ranks among the most deprived in terms of its employment deprivation as can be seen from **Figure C14-1**.

Figure C14-1 Local Industry Units by Broad Industry Group



Source: OAPF Draft IIA Report, GLA, February 2015

As such, consideration needs to be made to as how this can be addressed within the Local Plan whilst also considering how this redevelopment, its economic potential and new population increase will sit within the wider borough and London context.

B.14.2 Data Gaps and Uncertainties

- Planning consents for employment uses and take up of employment floorspace
- Noise impacts from commercial uses
- Commercial / retail rental data
- No. / % of people working from home

B.15 Deprivation and Living Environment

The following baseline data has been identified:

- Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010).

B.15.1 OPDC Area

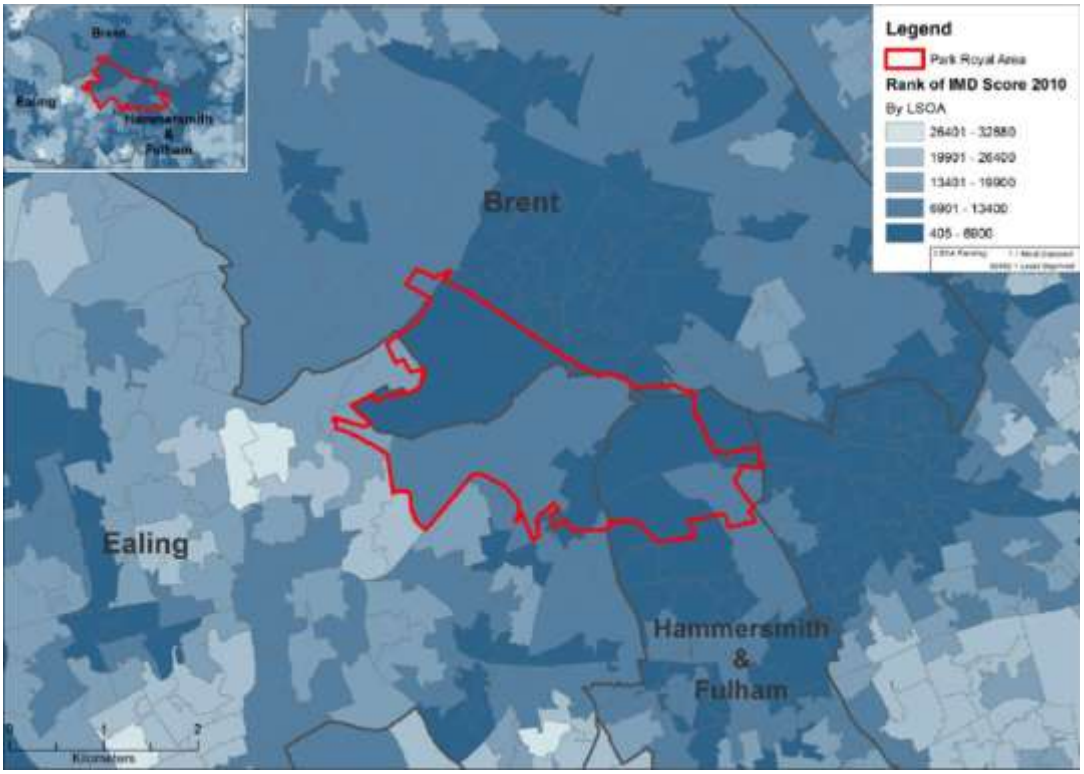
The Indices of Deprivation 2010 were published by Communities and Local Government in March 2011. The purpose of the Indices is to identify small areas of England which are experiencing multiple aspects of deprivation. It replaces the Indices of Deprivation 2007 as the official measure of deprivation in England. Deprivation is a multi-faceted and complex

problem which influences and is influenced by a wide range of factors. The ID2010 contains seven domains which relate to income deprivation, employment deprivation, health deprivation and disability, education skills and training deprivation, barriers to housing and services, living environment deprivation, and crime.

The average Indices of Multiple Deprivation (IMD) score measure reflects the average level of deprivation across LSOAs in the borough. In 2010, the study area's average IMD score ranks it has being in the most deprived LSOAs within London.

However, it's difficult to look at any trends for the study area due to the OPDC's recent formation and is made up of parts of a number of LSOAs.

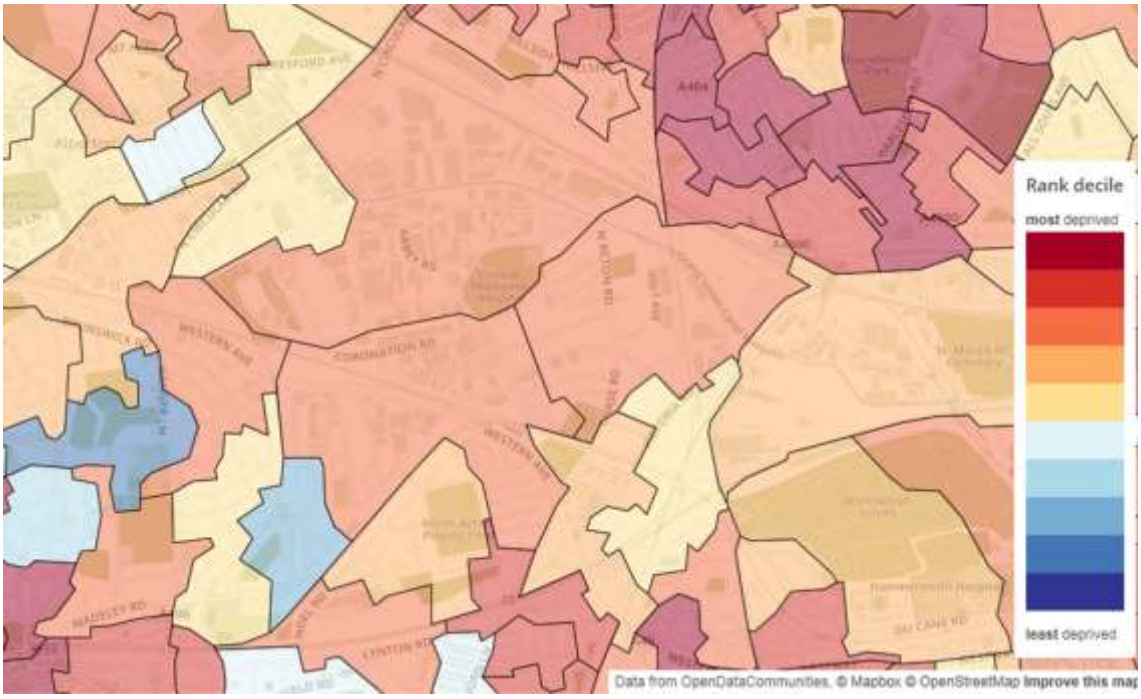
Figure C15-1 Indices of Multiple Deprivation in OPDC



Source: OAPF Draft IIA Report, GLA, February 2015

Given its largely industrial nature, it's also reasonable to assume that the small residential population coupled with its industrial make-up means that the levels of deprivation within the area may be skewed.

Figure C15-2 Overall living environment deprivation levels in OPDC



Source: Indices of Deprivation

As seen from **Figure C15-2**, what is clear irrespective of the set-up of the OPDC area is that it suffers from high levels of living environment deprivation probably due much to the fact that it is largely industrial rather mixed use or residential and this needs to be a significant consideration in the Local Plan.

B.15.2 Data Gaps and Uncertainties

- Provision of childcare
- Deprivation statistics for the area

B.16 Housing

The following baseline indicators have been used to characterise the status of housing across the borough:

- Dwelling Stock (Office for National Statistics Local Profiles)
- Household density (Office for National Statistics Local Profiles)
- Household composition (OAPF Draft IIA Report, GLA, February 2015)

The area only contains some 1,898 households, with the rest being industrial and warehouse units. Given the remit of the OPDC the housing numbers within the area is set to rise sharply in Old Oak. Currently dwelling stock suggests that compared to adjoining boroughs owner-occupiers is a lower percentage than that of Ealing and a large percentage are in private landlord's hands.

Table C16-1 Dwelling Stock by Tenure and Condition

Area	All households	Owned: Owned outright	Owned: Owned with a mortgage or loan	Shared ownership (part owned and part	Social rented: Rented from council (Local	Social rented: Other	Private rented: Private landlord or	Private rented: Other	Living rent free
England and Wales	23,366,044	30.8%	32.7%	0.8%	9.4%	8.2%	15.3%	1.4%	1.4%
England	22,063,368	30.6%	32.8%	0.8%	9.4%	8.3%	15.4%	1.4%	1.3%
London	3,266,173	21.1%	27.1%	1.3%	13.5%	10.6%	23.7%	1.3%	1.3%
Inner London	1,363,817	14.1%	19.4%	1.5%	18.8%	14.0%	29.2%	1.6%	1.5%
Outer London	1,902,356	26.2%	32.7%	1.1%	9.7%	8.2%	19.9%	1.2%	1.2%
Ealing	124,082	22.9%	28.2%	1.8%	10.5%	7.6%	26.4%	1.2%	1.5%
Brent	110,286	20.3%	22.6%	1.5%	9.7%	14.4%	28.8%	1.3%	1.4%
Hammersmith and Fulham	80,590	15.9%	18.1%	1.6%	15.7%	15.4%	30.0%	1.7%	1.5%
Park Royal & old Oak	1,898	12.9%	16.6%	7.5%	7.3%	17.1%	37.1%	1.2%	0.9%

Source: OAPF Draft IIA Report, GLA, February 2015

Household density at its most dense in the south-eastern part of the area due to the predominantly industrial use of the area itself as can be seen from **Figure C16-1**.

Figure C16-1 Household Density

Source: OAPF Draft IIA Report, GLA, February 2015

Affordable housing considerations as well as housing unit proportions (types and tenures) need to be considered in the Local Plan.

9% of households in the plan area are lone parent families and over 90% of these parents are women. The proportion of such households in the population doubles since the 1991 census. Single parents make up a high proportion of households living in social housing (23% of council tenants and 32% of housing associated tenants).

Lone parents experience some of the greatest levels of economic and housing need, their household incomes are only about a third of the average income. They are more than three

times more likely to be dependent on benefits than the average household, and twice as likely to be in unsuitable housing.

C.16.2 Data Gaps and Uncertainties

- Future population composition

C.17 Crossboundary Issues

For many authorities, the geographical scale of particular baseline issues means that they relate closely to neighbouring authorities. For example, housing provision and prices, employment migration and commuting, service provision and education can all result in flows of people across boundaries. In order to help to characterise the baseline further, some of these key 'crossboundary' issues have been identified below.

- There is not enough affordable housing being constructed in London to meet current demand; and as the number of households in London grows, demand for affordable housing will increase. These issues may be exacerbated in future years if trends remain the same. There are therefore opportunities for the OPDC Local Plan to contribute to reducing this trend.
- Surface water flood risk and the measures to manage this may also be a crossboundary issue e.g. surface water runoff from one borough having an impact on a neighbouring borough. OPDC need to work in partnership with the neighbouring boroughs to ensure flood risk is reduced for future generations.
- Employment and economic activity rates within OPDC area is particularly important especially when consideration needs to be made with adjoining town centres as well as existing business that may not have anywhere else to go.
- There is a severe lack of open space currently in the area and in the adjacent boroughs overall - it is important that the OPDC Local Plan incorporates open space.
- Although Wormwood Scrubs and the Grand Union Canal are important biodiversity assets, other space within the area and the adjoining boroughs need to be developed. The benefits of this could be at least two-fold. The Local Plan should support the existing biodiversity but also encourage more biodiversity into other sections of the study and promote green connectivity. Green spaces need to be multi-functional and evenly located so as to avoid over-reliance on one particular space.
- Impact of significant quantum of development on the surrounding heritage assets and settings needs to be carefully managed.
- Cumulative impacts regarding major roads and the impact on the new rail infrastructure should be considered.

Appendix D

Initial Analysis of other relevant SA Frameworks

Development of SA Framework Objectives

Note: although some of the objectives may be comparable to more than one objective, a 'best fit' approach has been taken. It is noted that relevant assessment criteria/sub-objectives from each of the frameworks will be drawn upon where relevant. It is also noted that although the HUDU Matrix assessment criteria relate to project-level assessments, these have been interpreted to become more relevant at the policy assessment level.

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: kay aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
1. Biodiversity. To conserve and enhance natural habitats and wildlife and bring nature closer to people.	**Biodiversity** EN4. To conserve and enhance biodiversity.	9. Protect and enhance the natural environment and biodiversity.		• Maintain or enhance biodiversity	**1. Conserve and enhance biodiversity and promote the use of green infrastructure** The HRA findings will be integrated into the SA through assessment under this objective.
2. Water Quality & Water Resources. To improve the quality of groundwater and to achieve the wise management and sustainable use of water resources. Minimise the risk of surface flooding and promote sustainable urban drainage.	**Water Quality & Resources** EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply.	12. Improve water quality, conserve water resources and minimise the impact of flooding.		• Incorporation of sustainability drainage techniques	**2. Improve the quality of water resources and achieve their sustainable use** **3. Minimise the risk of and from flooding**

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3. Natural resources. To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured products. Recycle demolition materials in construction and minimise the consumption of water and energy in developments			**Careful consumption** 10. Responsible consumption of resources in the borough.		The aspects of this objective will be covered under proposed objectives relating to: water resources; energy; regeneration and waste.
4. Climate Change. To address the causes of climate change through minimising the emissions of greenhouse gases. Encourage energy generation from renewable and low carbon sources, and promote energy efficiency.	**Climate Change** EN7. To reduce contributions to climate change and reduce vulnerability to climate change.	11. Reduce contributions to and vulnerability to climate change.	**Climate Change** 11. Reduce climate change and its impact on the borough.	• Incorporation of low and zero carbon energy source planning • Layout of development and schemes to maximise passive energy use, and respond to winter and summer temperatures including ventilation, shading and landscaping. • Proposals which incorporate sustainable design and construction techniques	**4. To minimise contributions to climate change through greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.** Reducing vulnerability to climate change will be targeted through other objectives including those

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					related to reducing flood risk, sustainable water use, minimising other resource use, sustainable design and green infrastructure.
5. Air Quality. To improve air quality.	**Air Quality** EN3. To improve air quality.	5. Minimise detrimental noise impacts. 10. Improve air quality.	**Reduce pollution** 8. Reduce the level of pollution.	• Minimisation of construction impacts • Minimisation of noise pollution caused by traffic and commercial uses • Minimisation of air pollution cause by traffic and commercial uses	**5. To minimise air, noise and light pollution, particularly for vulnerable groups**
6. Energy. To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.					The aspects of this objective will be merged under the climate change objective above.
7. Waste. To minimise production of waste across all sectors in the OA and	**Waste Management** EN8. To minimise the	14. Reduce waste generation and increase waste		• Proposals which encourage recycling (including building materials)	**6. To minimise production of waste across all sectors in the**

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increasing rates of re-use, recycling and recovery rates as well as composting of all green waste.	production of waste and use of non-renewable materials.	recycling.			**OA and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste.**
8. Soil conditions and contamination. Ensure all contaminated sites are remediated prior to development with the option of in-situ treatment investigated.	**Land and Soil** EN9. To conserve and enhance land quality and soil resources.				The aspects of this objective will be included under the regeneration objective below.
9. Accessibility / Availability (Transport). To ensure that all residents and visitors have access to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot (relative to those	**Traffic** EN1. To reduce the effect of traffic on the environment **Accessibility** S7. To improve accessibility to key services especially	15. Reduce vehicular dependency and promote the use of sustainable modes of transport.	**Reduce transport impacts** 9. Reduce the effect of transport on the environment.	• Prioritisation and encouragement of walking and cycling including through the use of shared spaces and cycle lanes/parking, including inclusive accessible routes. • Connectivity of public realm and internal routes to local and strategic cycle and walking networks • Traffic calming measures and minimisation	**7. Minimise the need to travel through improving accessibility by walking, cycling and public transport**

Draft IIA of OAPF	Brent Local Plan SA	Ealing Local Plan SA	Hammersmith and Fulham SA	HUDU Matrix Assessment Criteria: kay aspects	Commentary (including Key issues and PPPs), HRA and Draft SA Objective (in bold)
taken by car).	for those most in need. **Efficient Movement** EC5. To encourage efficient patterns of movement in support of economic growth.			of road injuries • Connectivity of new development to public transport, local services and facilities, reducing the need to travel by car	
10. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape /landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed	**Landscape & Townscape** EN5. To maintain and enhance the quality of landscapes and townscapes. **Historic Environment & Cultural Assets** EN6. To conserve and, where appropriate, enhance the historic environment and	3. Preserve and enhance the local historic environment and cultural heritage.	**Heritage** 7. Improve the local environment and heritage		**8. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape /landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed**

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	cultural assets.				
11. Regeneration and Land Use. To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.	**Regeneration** EC3. To reduce disparities in economic performance and promote sustainable regeneration.	13. Enhance existing buildings and facilities, and encourage the reuse/remediation of vacant land and under-utilised buildings.		• Proposals which make the best use of existing land	**9. To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings, including the remediation of contaminated land.**
12. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.	**Housing** S.4 to provide everybody with the opportunity to live in a decent home.	6. Improve access to well designed, affordable, inclusive and appropriately located housing.	**Affordable homes** 4. Provide decent and affordable homes	• Health and wellbeing credits of the Code for Sustainable Homes • Housing needs of older people including extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes • Adaptable homes for independent living for	**10. Improve access to well designed, well-located, affordable and inclusive housing of a range of types and tenures, to meet identified local needs.**

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				older and disabled people • Good design through layout and orientation • Range of housing types and sizes, including affordable housing, in response to local housing needs • Energy efficient housing (high SAP rating)	
13. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.	**Growth** EC1. To encourage sustainable economic growth. **Employment** EC2. To offer everybody the opportunity for rewarding and satisfying employment. **Investment** EC4. To encourage and accommodate both indigenous and	16. Promote local employment opportunities, training and skills attainment. 17. Support sustainable economic growth.	**Satisfying work** 6. Increase the opportunities for satisfying and well paid work. **Sustainable Economy** 12. Improve the sustainability of the local economy.	• Provision of access to local employment and training opportunities including temporary construction and permanent 'end-use' jobs • Provision of childcare facilities • Provision of managed and affordable workspace for local businesses, including live/work units • Opportunities for work for local people via local procurement arrangements	**11. To offer everyone the opportunity for rewarding, well-located and satisfying employment locally** **12. To encourage indigenous and inward investment to create sustainable economic growth**

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	inward investment.				
14. Liveability and Place. To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	**Community Identity** S6. To encourage a sense of community, identity and welfare				Aspects of this objective will be addressed under equality and diversity as well as accessibility and health and wellbeing objectives.
15. Open space. Improve the quality of the public realm and increase the number of public open spaces.		8. Protect and enhance public open space.		• Retention and enhancement of existing open and natural spaces including improved accessibility • Provision of new open or natural space • Provision of play spaces for children and young people • Provision of allotments and community farms to facilitate the supply of local food	**13. Improve the quality of the public realm and increase the provision, accessibility and quality of public open spaces.**
16. Education and Skills. To improve the education and	**Education and skills** S3. To improve the	18. Improve opportunities for education and	**Education and skills** 3. Improve the education and	• Contribution to meeting primary, secondary and post 19 educational needs	**14. To improve the education and skills**

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skills levels of the population.	education and skills of the population	training.	skills of young people and adults.		**levels of the population** .
17. Safety and security. Reduce the amount of crime and reduce the fear of crime through building and public realm design principles.	**Crime Prevention and Community Safety** S5. To reduce crime and anti-social activity	4. Reduce crime, fear of crime and antisocial behaviour.		• Proposals and policies seeking to design out crime including increasing natural surveillance • Creation of attractive, multi-use public spaces and buildings • Community engagement	**15. To reduce crime and the fear of crime through building and public realm design principles**
18. Health and Well-being. To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.	**Health and Wellbeing** S2. To improve the health and wellbeing of the population.	1. Actively support inclusive access to essential health, community and local services. 7. Reduce health inequalities and promote healthy living.	**Health** 2. Improve health of population overall	• Retention and provision of additional social infrastructure • Meeting identified needs for healthcare services • Meeting identified needs for other social infrastructure eg schools, social care and community facilities (including capacity, location and accessibility) • Opportunities for shared community use and co-location of services	**16. To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.**

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				• Provision of a range of retail uses, including for affordable shops, a range of food stores and avoidance of an over-concentration of hot food takeaways.	
19. Equality and Diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	**Prosperity and Social Inclusion** S1. To reduce poverty and social exclusion.	2. Promote community involvement, voluntary and partnership working. 19. Promote cultural and community identity.	**Social Justice** 1. Increase equality and social justice. **Social cohesion** 5. Increase local residents' sense of community and social cohesion.	• Connectivity of existing communities through layout and movement, avoiding physical barriers and severance and land uses and spaces which encourage social interaction • Provision of a mix of uses and a range of community facilities • Opportunities for the voluntary and community sectors • Adherence to the principles of Lifetime Neighbourhoods	**17. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.**