Local Plan Independent Examination

OPDC Response to Hearing Actions (Matter 2 – Integrated Impact Assessment) and Inspector's Questions 29 and 30

1. **BACKGROUND**

1.1 Old Oak Park Limited ("OOPL") submitted to the Inspector representations in response to Matter 3 ("Matter 3 Reps") which, amongst other matters, commented upon the OPDC's Integrated Impact Assessment ("IIA") of the draft Local Plan. The Matter 3 Reps included as an 'Appendix A' a document entitled 'Review of Integrated Impact Assessment (IIA) June 2018' prepared by Jam Consult Ltd and dated February 2019 ("JAM Review").

1.2 On 1 April 2019 DP9 (on behalf of OOPL) submitted to the Inspector a legal opinion prepared by David Elvin QC (the "DEQC Opinion") which provides commentary on 'compliance with the requirements of strategic environmental assessment'.

1.3 At the examination session on 2 April 2019 the Inspector informed OPDC officers that it would be helpful for him to see both a response to the JAM Review and also to the DEQC Opinion.

1.4 Accordingly, attached to this note are the following:

1.4.1 A note prepared by Arcadis which responds to the points raised in the JAM Review.

1.4.2 An Integrated Impact Assessment Addendum ("IIA Addendum") also prepared by Arcadis.

1.4.3 A legal opinion by Paul Brown QC and Richard Moules.

1.5 A brief summary of each document is set out below.

2. **RESPONSE TO THE JAM REVIEW PREPARED BY ARCADIS**

2.1 This is attached at **Appendix 1**.

2.2 This document sets out a paragraph by paragraph response to the matters raised in the JAM Review. The document comprehensively refutes the criticisms made by JAM. Also, in response to a specific request by the Inspector, it sets out references to other evidence base documents where these are relied upon by Arcadis (see final column entitled 'Document Reference').

3. **IIA ADDENDUM PREPARED BY ARCADIS**

3.1 This is attached at **Appendix 2**.

3.2 This document provides responses to the Inspector's queries on the IIA process and sets out how the IIAs that have been undertaken in relation to each iteration of the Local Plan have met the requirements of Directive 2001/42/EC, as transposed into English law by the Environmental Assessment of Plans and Programs Regulations 2004 ("2004 Regs").

4. **LEGAL OPINION BY PAUL BROWN QC AND RICHARD MOULES**

4.1 This is attached at **Appendix 3**.

4.2 This opinion responds to the points raised in the DEQC Opinion and concludes as follows:

4.2.1 the IIA does comply with the 2004 Regs;

4.2.2 the spatial strategy and quantum of housing and employment land for inclusion in the draft Local Plan were decided in the Further Alternations to the London Plan (2015) ("FALP") and the Old Oak and Park Royal Opportunity Area Planning Framework (4 November 2015) ("OAPF") – both of which were the subject of their own sustainability appraisal. Accordingly, the sustainability appraisal for the Draft Plan was not required to duplicate the consideration of reasonable alternatives that had occurred at a higher tier of the plan-making process;

4.2.3 as a matter of OPDC's reasonable plan-making judgment, there were no reasonable alternatives to the spatial strategy and quantum of housing and employment that would have been consistent with the FALP and OAPF;

4.2.4 OPDC has complied with the requirement to give reasons;

4.2.5 even if there was a failure to give reasons for the lack of reasonable alternatives, such reasons have been set out in the IIA Addendum; and

4.2.6 accordingly, OOPL's criticisms of the IIA process and reports are misplaced and should be rejected.

5. FURTHER QUERIES

5.1 If the Inspector has any further queries in relation to the documents submitted with this note he should not hesitate to contact OPDC officers and/or Pinsent Masons.

5.2 Pinsent Masons will be sending a copy of this note and its attachments directly to Town Legal LLP who are the legal advisors to OOPL and we understand that a copy will be placed into the examination library for general public access.

Pinsent Masons LLP
8 May 2019

APPENDIX 1

RESPONSE TO JAM REVIEW

APPENDIX 1: RESPONSE TO THE JAM REVIEW

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
Executive Summary	ES.5	The review has shown that the IIA is completely deficient, particularly in respect of the assessment of 'reasonable alternatives' available as well as substantial flaws in the application of the IIA methodology itself. The IIA process has failed to include an assessment of all reasonable alternatives in relation to the Spatial Strategy; Policy Options; and Site Allocations, fundamental to the development of the Local Plan strategy.	The responses throughout this table demonstrate that the IIA has been undertaken as part of a suite of evidence base documents for the IIA and has informed the development of the Local Plan in accordance with the requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment and The Environmental Assessment of Plans and Programmes Regulations 2004.	
Executive Summary	ES.6	The only options considered in relation to the Spatial Strategy concern affordable housing provision. The reason given for this approach is set out in **Section 3.4** of the **Regulation 19(2) IIA pp12-13,** which states that the Further Alterations to the London Plan (FALP) 2015 identified a target to deliver 25,500 homes and 65,000 new jobs, which has been carried forward in to the latest draft New London Plan 2017.	Overarching strategic options were assessed ahead of the drafting of the Regulation 18 Local Plan. The OPDC Local Plan sits within a hierarchy of development plans with the plan above it being the London Plan. OPDC is under a legal duty to have regard to the London Plan in preparing its Local Plan (section 19(2) of the Planning and Compulsory Purchase Act 2004). The current London Plan specifies "minimum guidelines for housing" for the various Opportunity Areas in Annex 1. Old Oak Common Opportunity Area is stated to provide: "Minimum new homes: 24,000". Park Royal Opportunity Area is stated to provide: "Minimum new homes: 1,500". On the basis that the London Plan specifies a minimum number of new homes for Old Oak and Park Royal any assessment by OPDC of a policy alternative(s) that did not provide for at least the minimum number of new homes specified in the London Plan would not be a "reasonable alternative" within the meaning of regulation 12(2)(b).	Integrated Impact Assessment for Regulation 18 Consultation dated 4 February 2016 London Plan – Consolidated with Alternations Since 2011 Integrated Impact Assessment Report on the Regulation 19(2) Second Revised Draft Local Plan (May 2018) – see section 3.4 (Assessment of Alternatives)

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
Executive Summary	ES.7	The FALP sets out the Policy for the Opportunity Areas in **Policy 2.13, pp76-77.** Particular attention is drawn to **part B (c) Planning Decisions:** "Development proposals within opportunity areas and intensifications areas should: c Contribute towards meeting (or where appropriate), exceeding the minimum guidelines for housing and/or estimates for employment capacity set out in Annex 1, **tested as appropriate** through opportunity area planning frameworks and/or local development frameworks." **[emphasis added]**	The FALP identifies a likely capacity for a total of 25,500+ new homes and 65,000 new jobs in the Old Oak Common and Park Royal opportunity areas across their combined 868ha. These potential development capacities were appropriately tested further through OPDC's Local Plan evidence base including the various Development Framework Principles documents and the Development Capacity Study. The Development Capacity Study (DCS) (4th February 2016), was initially drafted for the Regulation 18 Consultation and was subsequently updated for each of the Regulation 19 consultations, to provide development capacity information in accordance with the Planning Practice Guidance (PPG). Within the Regulation 18 DCS, the methodology identified that Stage 1 of the testing process was to calculate the minimum residential density required to deliver 25,500 homes across the available areas for residential development, based on the emerging illustrative masterplan for Old Oak, set out in the Old Oak and Park Royal OAPF and given that this is the London Plan's minimum requirement for housing in this areas. Paragraphs 2.8 and 2.9 of the OAPF set out that: '*This would require a density of 447 units per hectare to be delivered across all areas identified suitable for housing. However, this approach would not be compliant with London Plan policy 2.13 which seeks development to respond to opportunities presented by public transport access improvements and constraints generated by sensitive locations within a local context.'* Stage 2 of the testing process sought to ensure that the approach accords with London Plan Policy, seeking to distribute residential density across the plan area, while responding to: sensitive locations, public transport improvements, other key destinations and new residential areas.	Old Oak Development Framework Principles Park Royal Development Framework Principles Development Capacity Study Old Oak and Park Royal Opportunity Area Planning Framework (November 2015) Retail and Leisure Needs Study Industrial Land Review Strategic Housing Market Assessment (SHMA)

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
			The Regulation 19(1) and 19(2) DCS documents continued this methodology in accordance with the PPG guidance for Housing and Economic Lane Availability Assessments. In summary, the DCS tests the capacity and distribution of homes across the OPDC area while considering the need to meet the minimum housing targets of the London Plan. However, the testing did not account for the provision of housing capacity at levels below that specified in the London Plan minimum targets. The Development Capacity Study is informed by four Development Framework Principles Local Plan supporting studies which tested the appropriate capacities also in light of the housing targets set out in the London plan. The DCS also tests the capacity and distribution of jobs within the plan area. The London Plan identifies Old Oak as being able to accommodate approximately 55,000 new jobs across the full development period. The Development Capacity Study considers the draft Retail and Leisure Needs Study and the Industrial Land Review, as well as the OAPF. The Old Oak and Park Royal OAPF identifies that a large proportion of jobs to be delivered will be office based in Old Oak alongside opportunities for smaller 'open workspaces' (defined by the London Enterprise Panel here) to support micro businesses and SMEs. Jobs within Park Royal will continue to be industrial based. The approach in the Development Capacity Study considers the economic floorspace required, in line with the London Plan indicative employment capacity figure and where this is proposed to be located. In combining these two approaches for non-industrial and industrial jobs, the study identifies that 40,400 jobs could be accommodated in Old Oak and Park Royal during the plan period.	

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			Phasing of development has been considered in accordance with the PPG methodology. In summary, the DCS tests the capacity and distribution of jobs and economic floorspace across the OPDC area while considering the need to meet the minimum targets of the London Plan. However, the testing did not account for the provision of jobs capacity at levels below that specified in the London Plan minimum targets. The Development Capacity Study is informed by four Development Framework Principles Local Plan supporting studies which tested the appropriate capacities also in light of the jobs targets set out in the London Plan.	
Executive Summary	ES.8 to 9	ES.8 The OAPF also states at para 1.23: "Initial assessments undertaken by OPDC suggest that Old Oak and Park Royal combined could accommodate the delivery of 25,500 homes and 65,000 jobs. OPDC will, through it's Local Plan, carry out work to further consider the deliverable quantum of development." ES.9 An IIA of the OAPF was carried out in November 2015 but did not carry out any formal testing of alternatives as required by the Regulations and guidance. Two possible scenarios for the quantum of residential and commercial space were considered but they were not assessed against the IIA framework and therefore did not assess the necessary social, economic and environmental implications of the different options against the baseline. **(OAPF IIA, Section 5, pp91-94)**	The OPDC Local Plan must have regard to the London Plan. The quantum of growth (including residential and commercial) for Old Oak and Park Royal is set out in the London Plan, which sits above the OPDC Local Plan in the development plan hierarchy. The quantum of growth figures was devised, appraised (in the London Plan's accompanying IIA) refined, examined, found sound and adopted through London Plan Policy 2.13. The OAPF is supplementary to the London Plan. Accordingly an policy alternative which sought to provide less development in the Old Oak and Park Royal Opportunity Areas than that specified in the London Plan would not be a "reasonable alternative" (see Legal Opinion from Paul Brown QC and Richard Moules).	London Plan Old Oak and Park Royal Opportunity Area Planning Framework (November 2015)
Executive Summary	ES.10	A Transport Strategy for the OAPF was also prepared in 2015, however, the following should be noted:	The wording referred to in the report producing by Jam Consult Ltd is C.13.1 of the IIA Scoping Report. This sentence is incorrect within the Scoping Report. This is demonstrated in the following paragraphs.	

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
		"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" **Appendix B, B.13.1 (p151 PDF)**	Careful consideration was provided in OPDC's Old Oak Strategic Transport Study and the Park Royal Transport Strategy. The Old Oak Strategic Transport Study 'considers the transport impacts of an additional 24,000 homes and 55,000 jobs being provided at Old Oak Common'. A similar approach was taken for the Park Royal Transport Strategy. Other transport studies were undertaken including the Public Realm, Walking and Cycling Strategy. This evidence base informed Local Plan policies, which were assessed by the IIA.	Old Oak Strategic Transport Study Park Royal Transport Strategy
Executive Summary	ES.11 to ES.12	The OPDC Local Plan sets out an ambitious Spatial Vision & Strategic Policies for the regeneration of the area, which aim to deliver: high density; commercial; industrial and residential development; including new mixed-use development; significant new infrastructure and services; and the provision of new open space. The Local Plan sets out the key 'challenges' (**p13**) to achieving the vision as: • The Role of Park Royal and Old Oak and Strategic Industrial Land • Higher Density Development • Climate Change and infrastructure provision • Deliverability and viability of development and infrastructure • Diversity of Housing • Competing demand for space – including open space and services • Adaptability and phasing • Managing traffic and construction and the need for new transport infrastructure.	Both opportunities and challenges are set out in figure 2.1 on pages 12 and 13. Paragraph 2.5 on page 12 states that: *"Figure 2.1 identifies some of these key opportunities and challenges facing the delivery of the spatial vision, which are addressed in the spatial vision itself and policies in this Plan."* The content of the spatial vision and policies address the challenges. Both these elements were assessed within the IIA. Therefore, the challenges have been considered in the IIA. **Reasonable alternatives to spatial options:** The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified that the preferred option was to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal Opportunity areas are referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in	Integrated Impact Assessment Further Alterations to the London Plan (December 2013) London Plan – Consolidated with Alternations Since 2011 Old Oak and Park Royal Opportunity Area Planning Framework (Adopted November 2015_ Old Oak and Park Royal Opportunity Area Planning Framework IIA November 2015 Legal Opinion by Paul Brown QC and

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
			2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015 and subject to an IIA. The current London Plan (2016) and the Draft New London Plan (2017) also continue to set out these minimum homes and jobs targets. In light of these strategic planning documents defining the housing and jobs targets for the Old Oak and Park Royal, alternative development capacities are not considered to be reasonable alternatives and have therefore not been assessed. This approach is supported by case law - see paragraphs 20-35 of the Legal Opinion from Paul Brown QC and Richard Moules. As Supplementary Planning Guidance to the London Plan, the OAPF[1] provides further detail in respect of the London Plan polices that apply to the Old Oak and Park Royal Opportunity Area and consequently the OPDC Local Plan must have regard to it. The document includes a comprehensive land use strategy, which doesn't offer any alternatives for consideration by the OPDC Local Plan. In addition to determining the required quantum of growth to be accommodated in the Old Oak and Park Royal Area, the land-use strategy in the OAPF SPG sets out the core development areas and clearly determines that Old Oak needs to accommodate mixed-use residential led development whilst Park Royal is a Strategic Industrial Location. This is displayed in Figure 17. Principles	Richard Moules dated 5 April 2019
Executive Summary	ES.13	Yet, despite the significant challenges identified in delivering the Local Plan, the only spatial issue to be considered at all within the IIA has been affordable housing provision. It is clear from the London Plan policy, OAPF and the SA regulations and guidance that different Spatial Options needed to be tested to ensure the selection of the most appropriate strategy for the regeneration of the area. Such options should have included the following suggested alternatives or combinations of options: • 'Business as usual' or 'do nothing' approach • Extent of SIL re-designation and industrial intensification • Quantum/mix of development • Location of development • Variation in densities/locations for tall buildings • Infrastructure requirements • Phasing and deliverability		

[1] The Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) is Supplementary Planning Guidance to the Mayor's London Plan (2015).

The framework has been produced by the Greater London Authority, with contributions from Old Oak and Park Royal Development Corporation, Transport for London and the London boroughs of Brent, Ealing and Hammersmith & Fulham. It was adopted by the Mayor on 4 November 2015.

The framework sets out planning guidance to transform Old Oak, regenerate Park Royal and continue the protection of Wormwood Scrubs.

As Supplementary Planning Guidance to the London Plan, the Old Oak and Park Royal OAPF has a significant influence on planning application decisions in the OPDC area.

https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/opdc-planning/old-oak-and-park-royal-opportunity-area-planning-framework

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			L1 and L2 in the OAPF also require development in these locations to abide by certain principles. A pivotal 'fixed' element in the area is the location of the Crossrail/HS2 station 'super-hub' and '*The OAPF itself is based around the opportunity this affords in planning terms.*' It is important to note that the Integrated Impact Assessment accompanying the OAPF considered reasonable alternatives to the proposed development, including in terms of: • Need/demand for development; • Intensity of development; • Location of development; • Timing of development (i.e. differently phases approaches); and • Details on the development's implementation. Paragraph 5.3 of the OAPF IIA Report sets out that *'An Old Oak Common Redevelopment Scenarios internal study was undertaken by Jones Lang LaSalle in association with Peter Brett Associates in March 2014 as part of the preparation of the OAPF comprising a detailed spatial and market analysis of the core redevelopment areas. The main purpose of study was to explore the optimum quantity of development that could deliver the regeneration objectives of the planning framework under the London Plan and appropriate quantum and balance of uses, and in particular the phasing. The study only focussed on lands likely to be redeveloped in the long-term period.'* Paragraph 5.5 sets out that '*Environmental factors such as noise, air quality, water, pollution were not specifically analysed as part of the scenario testing. Environmental constraints are consistent across all scenarios as all fundamentally explore ways of regenerating available sites in Park Royal – Old Oak. The key challenge in all scenarios is finding the balance between the potential development quantum and the capacity of supporting infrastructure and*	

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			services. The consideration of redevelopment scenarios allows the iterative development of OAPF policies. Furthermore, the London Plan imposes a requirement to utilise the potential of the lands as much as possible. There is a clear logic in that, where jobs and homes are not created in this location, the alternative would be re-location to suburban places and greenfield sites that do not perform well when set against the sustainability criteria previously referred to.' Paragraph 5.9 states that '*While the foregoing scenario testing exercise did not present a 'Preferred Alternative' per sae, it informs the OAPF of capacities, constraints and mitigation measures. The feedback into OAPF guidance is significant, particularly in constraints on car parking and use for new development in line with road network capacity, and improvements in rail services associated with Crossrail. Strong policy direction on open space, street improvements, green networks and soft-transport alternatives arise directly from this process.*' The OAPF has therefore determined the quantum and general distribution strategy to be delivered through the OPDC Local Plan, and this spatial strategy has been assessed and adopted in light of the reasonable alternatives dealt with. With regards to the proposed quantum of development and the spatial distribution for achieving this, the OPDC Local Plan has clearly satisfied the requirements of SA/SEA in terms of reasonable alternatives. Optimising densities in Opportunity Areas and in areas of good public transport is underpinned by national and regional policy.	
Executive Summary	ES.14	The above spatial options have not been tested at any stage of the SA process, including the 'business as usual' or 'do nothing' approach, which is of particular relevance for a regeneration area. It can therefore not be determined whether any of the identified 'challenges' can be	The 'business as usual' or 'do nothing' approach is not a reasonable alternative and therefore not required to be assessed as part of the SA/SEA process. The OPDC Local Plan IIA was very clear as to the development targets that have been set for the area in the London Plan and as a	OPDC Local Plan IIA (May 2018)

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		overcome. The IIA therefore shows a complete lack of transparency in how decisions in the Plan have been made.	consequence why alternative development capacities have not been considered - see section 3.4.	
Executive Summary	ES.15	Owing to the significance of the Strategic Industrial Land within the Opportunity Area, alternatives to its release and re-designation were essential issues for consideration. Other options should also have tested whether the proposed quantum, mix, distribution and density of development or the proposed transport and open space infrastructure, would deliver the most appropriate strategy.	This is not a reasonable alternative given development requirements for the area in the London Plan. The SIL and its quantum, mix, distribution, density of development and proposed infrastructure is: a) Determined by the adopted London Plan and the OAPF and therefore it would be inappropriate for the OPDC to change this; and b) Informed by a range of OPDC evidence bases that are better suited for informing the OPDC's decision making with regards to SIL	
Executive Summary	ES.16	In addition, the quantum of development that is proposed for allocation within the Local Plan period (20,100 homes and 40,400 jobs) is actually lower than the London Plan target, and is in effect a reasonable alternative, which contradicts the reasons given in the IIA for not testing other alternative options.	London Plan target is for the full development period. OPDC's full development period goes beyond the Local Plan period. Local Plan period is 20 years and the Plan clearly states that the majority of the homes and jobs that are allocated will be provided within the OPDC Local Plan Period (see Local Plan paragraph 3.3). The London Plan requires the OPDC to appropriately test these stated minimum quantum of growth figures to better refine them, which was done.	
Executive Summary	ES.17	An assessment of some policy options was carried out in the Regulation 18 version of the IIA. However, there is no explanation within the IIA of what those policy options were or the reasons for their selection. There is also no explanation of the reason alternatives were rejected.	Policy alternatives (where these were reasonable alternatives) were assessed as part of the Regulation 18 Local Plan IIA Report (Appendix G). The details of the alternative policy options and why they were considered are provided within the Local Plan consultation itself. The IIA Addendum (April 2019) sets out reasons for selecting or not selecting alternative policies.	IIA for Draft Regulation 18 Consultation (4 February 2016) Local Plan – Draft Regulation 18 Consultation (4 February 2016)

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
Executive Summary	ES.18	With regard to the site allocations, the Local Plan includes 34 site allocations out of a total 55 sites that were originally considered. The IIA has only considered the allocated sites in its assessment. All of the sites should have been assessed against the IIA framework and reasons for the selection and rejection of alternatives provided. The assessment results provide generic, optimistic assumptions, which have not considered the baseline scenario or the evidence base available.	<u>Site allocations and reasonable alternatives</u> The OPDC Plan allocates 34 sites for different types of development out of the originally identified 55 sites. OPDC prepared a broad base of evidence documents which informed their decision making during the identification and allocation of sites, perhaps most notably the Development Capacity Study (DCS). Through the DCS, OPDC reviewed the 55 potential sites for development and discounted sites that were considered to be undeliverable or undevelopable. The viability of the sites to be delivered was assessed through an earlier Local Plan supporting study – the Whole Plan Viability Study. This demonstrated that generally development sites are viable. Those that were considered to be deliverable or developable and met the definition of site allocations were carried forward to the Local Plan and the IIA process. The IIA did not identify or evaluate the environmental effects of the sites discounted by the DCS because they do not qualify as reasonable alternatives for the purpose of SEA as a result of their undeliverable or undevelopable nature. The rationale for the inclusion of site allocations within the Local Plan is based on the evidence set out in OPDC's DCS (Appendix A) and OPDC's definition of site allocations (see below). The DCS has been prepared in accordance with the National Planning Practice Guidance for Housing and Economic Land Availability Assessments[2]. Following the completion of the DCS, OPDC then applied its definition of site allocations to the sites identified to the deliverable and developable within the plan period. These site allocations were assessed within the IIA. The OPDC definition of site allocations are:	Development Capacity Study

[2] NPPG HELAAs: https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment [Accessed 26.03.19]

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
			a) sites are anticipated to come forward in the first 10 years and that would make a significant contribution to OPDC achieving its homes target, by delivering over 100 homes; and/or b) sites are anticipated to be brought forward between 11-20 years and that would make a major contribution to OPDC achieving its homes target, by delivering over 1,000 homes; and/or c) sites are anticipated to deliver a minimum of 10,000 sqm of commercial and/or industrial floorspace during the plan period. **Approach to appraisals** Local Plan paragraph 3.83 identifies that site allocations are used to help OPDC demonstrate its supply of land for new housing, commercial and industrial floorspace. Therefore, they are used to help to deliver the homes and jobs capacity within each of the place policies. The IIA assessed the Place Policies, which include housing and jobs targets, for their likely impacts against the Objectives in the IIA Framework. Notwithstanding this, site allocations were appraised for their likely impacts against the Objectives in the IIA Framework. The Objectives in the Framework and their indicators were developed during the IIA Scoping stage and consulted upon with the statutory consultees, including through a Scoping Workshop. Each IIA Objective was derived from the information gathered during the IIA Scoping stage in terms of environmental baseline data in the OPDC area as well as local sustainability issues and opportunities. As such, when appraising each site against an IIA Objective, it is essentially a process of appraising a site for its likely impacts on the current environmental baseline in the OPDC area as well as the extent to which it exacerbates existing sustainability issues or	

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			contributes towards maximising opportunities for contributing towards more sustainable development. As an example of this, assessments of options against IIA Objective 10 'Create and enhance biodiversity and the diversity of habitats across the area and its surroundings' identify and evaluate the likely effects of the option on the biodiversity baseline. The Indicators for this Objective are all related to the environmental baseline and key sustainability issues and opportunities related to biodiversity, such as 'Condition of Wormwood Scrubs Local Nature Reserve' and 'Condition of Grand Union Canal area of nature conservation'. For each option in the OPDC Plan, the impacts of the option on the Wormwood Scrubs LNR were identified and evaluated and, as such, an appraisal of its impacts on the environmental baseline and a key sustainability issue in the Plan area was provided. This can be seen in the appraisal results presented in Appendix F and G of the draft IIA Report[3], such as for OSP4 which states: *"The area includes a Local Nature Reserve (Wormwood Scrubs) and a nature conservation area of Metropolitan Importance adjacent to the Grand Union Canal. Anecdotal evidence as part of the scoping workshop has suggested that some of the brownfield areas within the site may have importance for biodiversity through the presence of colonising species. Increased development densities could have negative effects on the biodiversity through increased demand for land resources and disturbance. Certainty in the prediction of effects is considered to be low although note that EU8 requires no net loss of biodiversity."* Where reasonable alternatives have been appraised, the results in Appendices F and G also highlight the different	

[3] Appendices F and G of the, Draft IIA Report, Local Plan. Appendices are available online at: https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_iia_report_appendices_new_cover.pdf [Accessed 26.03.19]

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			impacts each option would have on the baseline. For example, the appraisal of Policy T1 against Objective 10 states: *"The policy would not have any significant effects for the objective. Promoting sustainable transport over cars could benefit biodiversity by reducing emissions, run-off and noise. Whilst there is benefits in areas close to the LNR, in general biodiversity levels in the area are limited due to existing uses and the wider development proposals so the benefits of this may not be significant."* In comparison, the appraisal of the reasonable alternative for this policy, T1 Option 1, states: *"The option would be detrimental to biodiversity due to the encouragement of car travel and associated increase in emissions and disturbance effects."*	
Executive Summary	ES.19	Different scenarios should have been tested within the IIA to understand the social, economic and environmental impacts of alternative policies and proposals, in order for the SA to demonstrate how it has informed the development of the Plan. Paragraph 018 of the National Planning Practice Guidance sets out how the SA should assess alternatives and identify likely significant effects. The SA has failed to carry out the assessment according to the regulations and guidance above, particularly in respect of the following: • No consideration of key 'challenges' to inform the selection of options • Failure to assess all reasonable alternatives, in particular the Spatial Strategy Options, Policy Options and Site Options for the Plan • Failure to provide an outline of the reasons the alternatives were selected, the reasons the	**No consideration of key 'challenges' to inform the selection of options:** See response to ref ES.12 above. Both opportunities and challenges are set out in figure 2.1 on pages 12 and 13 of the Draft Local Plan. Paragraph 2.5 on page 12 states that: *"Figure 2.1 identifies some of these key opportunities and challenges facing the delivery of the spatial vision, which are addressed in the spatial vision itself and policies in this Plan."* The content of the spatial vision and policies address the challenges. Both these elements were assessed within the IIA. Therefore, the challenges have been considered in IIA. **Failure to assess all reasonable alternatives, in particular the Spatial Strategy Options, Policy Options and Site Options for the Plan**	Integrated Impact Assessment Report on the Regulation 19(2) Second Revised Draft Local Plan (May 2018) OPDC Local Plan Integrated Impact Assessment Addendum (March 2019)

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
		rejected options were not taken forward and the reasons for selecting the preferred approach in the light of the alternatives • Failure to provide conclusions on the overall sustainability of the different alternatives • Inadequate prediction and evaluation of the effects • Failure to link to the appropriate evidence to support the decisions taken • Inadequate assessment of cumulative effects • Failure to suitably identify potential mitigation measures • Failure to show how the SA has informed the Local Plan • Failure to demonstrate a transparent process.	All reasonable alternatives were assessed. There was very limited scope for reasonable alternatives to proposals in the plan (including for quantum and spatial) to the requirements of the London Plan and its Old Oak and Park Royal OAPF SPG. This is explained more in the response under ref ES.12 and 13. Ultimately the selection of reasonable alternatives is a matter of planning judgment. This is also explained in Section 3.4 of the Old Oak and Park Royal Development Corporation Regulation 19(2) Second Revised Draft Local Plan Integrated Impact Assessment Report (May 2018). **Failure to provide an outline of the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in the light of the alternatives** Section 3.4 of the Old Oak and Park Royal Development Corporation Regulation 19(2) Second Revised Draft Local Plan Integrated Impact Assessment Report (May 2018) states that the purpose of the IIA assessments *"was to determine the sustainability strengths and weaknesses of each option, such that this information would be used by the plan-makers to develop the plan's policy options and preferred policies (section 6.3). The preferred policies and policy options were then assessed alongside one another in detail, which enabled a comparison of their predicted sustainability effects, to inform the development of the preferred policies. A matrix was used for this assessment enabling the policies and options to be easily compared."* The IIA therefore made clear that OPDC's decision-making in terms of the options available was in part determined by their sustainability performance in light of the alternatives considered.	

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			Failure to provide conclusions on the overall sustainability of the different alternatives The IIA report includes an NTS which summarises the effects of the options. These are further summarised in the main chapters of the report. Detailed assessments are then provided in the appendices. **Inadequate prediction and evaluation of the effects** The assessments were carried out using an IIA framework that was consulted on with the public and statutory bodies and found to be appropriate. The assessment results follow the requirements of the SEA Directive (including Annex I on defining significance) and the results helped to inform OPDC in the selection and refining of options. This approach is proportionate and has been undertaken by independent experts using a well-established good practice approach. **Failure to link to the appropriate evidence to support the decisions taken** The assessment results considered the baseline evidence, not only through direct consideration, but also through the intrinsic nature of the IIA Framework, which is based on the baseline developed through Stage A of the IIA process. **Inadequate assessment of cumulative effects** Cumulative effects were an inherent feature of the assessment process, incorporated into the assessment results discussed in Chapter 7 of the Reg 19(2) IIA. The summaries of assessments grouped relevant policies together (e.g. policies from the Environment Chapter) in the OPDC Plan as this enabled the IIA to consider all policies that would be likely to have cumulative impacts in-combination. **Failure to suitably identify potential mitigation measures**	

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			The Old Oak and Park Royal Development Corporation, Regulation 19(2) Second Revised Draft Local Plan Integrated Impact Assessment Report (May 2018) states as follows: "*An appraisal was previously undertaken in 2017, the Draft Local Plan was then amended in light of this and this IIA Report has now been updated with track changes to reflect the latest version of the Plan. The next two chapters represent the latest results of the appraisal and also summarise the key areas of difference between the latest version and the previous version of the Draft Local Plan*". (Section 4.4) *"Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Local Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified. Recommendations within Appendix D are italicised for clarity. As the Regulation 19(2) Second Revised Draft Local Plan has been developed in parallel to the SA process, mitigation measures have been incorporated on a continual basis into the Local Plan."* This approach is proportionate and has been undertaken by independent experts using a well-established good practice approach **Failure to show how the SA has informed the Local Plan** The Old Oak and Park Royal Development Corporation, Regulation 19(2) Second Revised Draft Local Plan Integrated Impact Assessment Report (May 2018) states as follows: *"The intention has been, throughout the Regulation 18 and Regulation 19 various stages of assessments, to ensure that the process is iterative while maintaining an independent assessment with regular feedback occurring between the*	

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			plan-makers and the IIA team, as options are developed." (Section 3.3) and *"As the Regulation 19(2) Second Revised Draft Local Plan has been developed in parallel to the SA process, mitigation measures have been incorporated on a continual basis into the Local Plan."* (Section 4.5) - The IIA Addendum (April 2019) provides further clarity on how the Local Plan has incorporated the recommendations of the IIA. **Failure to demonstrate a transparent process** The IIA Report has been consulted on with the public at various stages, exceeding the statutory requirements. The IIA reports have been provided with 'tracked changes' to show how various elements have changed from iteration to iteration. The reports are available online and freely accessible to the public. Each iteration of the IIA report sets out the stages that have led up to the current report and clarified how and why the Local Plan and IIA processes have reached their current stage. Overall the IIA process is considered to have gone above and beyond the minimum statutory requirements to be transparent and to encourage public participation.	
Executive Summary	ES.20	It is clear from the London Plan policy, OAPF and the SA regulations and guidance that different Spatial Options needed to be tested to ensure the selection of the most appropriate strategy for the regeneration of the area. It is evident from the findings above that a sustainability assessment of	See responses to refs ES.12 and ES.13.	

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		the spatial options has not been undertaken (**see Annex 1 to this report**) and the IIA cannot have informed the development of the Plan. The SA is therefore totally deficient.		
	ES.21	The IIA has not been prepared in parallel to the development of the Local Plan to inform its development. A 'retrofitting' exercise to try and correct the failures in the IIA will therefore not be possible as it will not achieve the aims of the regulations or legal requirements.	As is evident from the Local Plan consultation webpage[4], the different iterations of the IIA have been developed alongside the development of the Local Plan from the outset, informing its development through close collaboration between the IIA and Local Plan-making teams. Therefore the IIA has been developed in parallel with the Local Plan. In accordance with regulation 12(5) of the SEA Regulations, the Scoping Report was consulted upon for a five-week period, commencing in September 2015. The statutory SEA bodies consulted were: • Natural England; • Historic England; and, • The Environment Agency. A draft IIA Report was, alongside the Regulation 18 Draft Local Plan, consulted on between 4th February and 31st March 2016. Comments received have been integrated into the IIA Report and presented in Appendix C of the 2018 iteration. The Regulation 19(1) Draft Local Plan, along with its draft IIA Report was consulted on in the summer of 2017. Comments received have been integrated into the IIA Report and presented in Appendix C of the 2018 iteration.	IIA for Draft Regulation 18 Consultation (4 February 2016) - Appendix C Integrated Impact Assessment Report on the Regulation 19(2) Second Revised Draft Local Plan (May 2018) - Appendix C
Executive Summary	ES.22	The failures identified in the assessment demonstrate that the findings cannot be considered credible, justified or robust and can only lead to the conclusion that the SA	For the reasons given in the responses above the SA is fit for purpose and complies with the SEA Regulations.	

[4] https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/opdc-consultations?order=DESC

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		is not fit for purpose or legally compliant and that the OPDC Local Plan can therefore not be considered sound.		
The body of the report repeats the above issues but with more detail. The conclusions repeat the Executive Summary so we have not captured the conclusions.				
Section 2: The SA process		The NPPG [001] is clear on the purpose of the SA process: "This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the Local Plan." The report contends that these conditions have not been met as challenges were not adequately addressed and alternative options were not assessed.	As is evident from the Local Plan consultation webpage that the different iterations of the IIA have been developed alongside the development of the Local Plan from the outset, informing its development through close collaboration between the IIA and Local Plan-making teams. Therefore the IIA has been developed in parallel with the Local Plan. See response to ref ES.12 with regards to options.	
The SA process	2.1.1-2.1.2	Scoping Report 2.1.1 The Scoping Report for the IIA was published for consultation in December 2015, which sets out the proposed methodology and scope of the assessment. Of particular note is **section 2.2.1**, **pp7-8**, which relates to the '**Aspects of the Local Plan to be Assessed and**	The potential for identifying reasonable alternatives is appropriate to be defined within an IIA Scoping Report. This reflects the early stage of the IIA process before assessment has been undertaken. It should be noted that the Scoping Report on page 7 notes that "*Alternatives have been a focus for several legal*	IIA Scoping Report (December 2015)

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		how' and **'Assessment of Alternatives',** as follows: "As options emerge, each of its components will be assessed to determine sustainability performance and to provide recommendations for sustainability improvements." "It is a requirement of the SEA Directive that 'reasonable alternatives' are assessed and, therefore, alternative options will be assessed using the IIA Framework." "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." It is clear that at this stage in the process it was intended to examine reasonable alternatives to the Strategic Spatial Strategy, Policies and Site Allocations as required by the regulations and guidance.	*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."*	
Integrated Impact Assessment	2.2.1	An Integrated Impact Assessment (IIA) incorporating Sustainability Appraisal has been carried out at all stages of the Local Plan Development, including Regulation 18, Regulation 19 (1) and Regulation 19 (2). However, the review of the IIA has found that the assessment is inadequate and does not comply with the necessary regulations and guidance at each stage in the process.	Appendix F to the IIA Report, which accompanied the Regulation 19 Local Plan for consultation, provides a SEA Regulations Compliance Checklist, demonstrating where compliance with the regulations is documented. See also section 4 of the IIA Addendum which is an SEA Checklist.	Integrated Impact Assessment Report on the Regulation 19(2) Second Revised Draft Local Plan (May 2018) - Appendix F OPDC Local Plan Integrated Impact Assessment Addendum (March 2019)
Assessment of spatial options	2.2.2 – 2.2.3	The IIA process has failed to include an assessment of all reasonable alternatives in relation to the Spatial Strategy; Policy Options;	See responses to refs ES.12, ES.13, ES.17, ES.18 and ES.19 above.	IIA for Draft Regulation 18

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		and Site Allocations. The only options considered in relation to the Spatial Strategy concern affordable housing provision. The reason given for this approach is as follows: "In light of these strategic planning documents defining the housing and jobs targets for the Old Oak and Park Royal, alternative development capacities are not considered to be reasonable alternatives and have therefore not been assessed." Overarching strategic options were assessed ahead of the drafting of the Reg 18 Local Plan.		Consultation (4 February 2016)
Assessment of spatial options	2.2.4 – 2.2.6	The IIA goes on to explain: "Overarching strategic options were assessed ahead of the drafting of the Regulation 18 Local Plan. The purpose of the assessment was to determine the sustainability strengths and weaknesses of each option, such that this information would be used by the plan-makers to develop the plan's policy options and preferred policies." There is no explanation of what the 'overarching strategic options', which were considered included. Such options are not provided in the Regulation 18 IIA Report and no assessment of such options has been found. The above approach also clearly differs from that set out in the Scoping Report and does not comply with either the SA regulations and guidance or the policy of the London Plan.	The strategic options assessed specifically within the IIA related to affordable housing. See responses to ES.12, ES.17, ES.18 and ES.19.	IIA for Draft Regulation 18 Consultation (4 February 2016)
Assessment of spatial options	2.2.7	The approach also contradicts the OAPF, which stated: "1.23 Initial assessments undertaken by OPDC suggest that Old Oak and Park Royal combined could accommodate the delivery of 25,500	See response to ref ES.7. The FALP identifies a requirement to provide a minimum of 25,500 new homes and an indicative capacity for 65,000 new jobs in the Old Oak Common and Park Royal opportunities areas across their combined 868ha. These development capacities were appropriately tested further through OPDC's Local Plan evidence base including	Old Oak North Development Framework Principles

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		homes and 65,000 jobs. OPDC will, through its Local Plan, carry out work to further consider the deliverable quantum of development.	the various Development Framework Principles documents and the Development Capacity Study.	Park Royal Development Framework Principles Development Capacity Study
Assessment of spatial options	2.2.8	An IIA of the OAPF was carried out in November 2015, however, it did not carry out any formal testing of alternatives as required by the Regulations and guidance. Two possible scenarios for the quantum of residential and commercial space were considered but they were not assessed against the IIA framework and therefore did not assess the necessary social, economic and environmental implications of the different options against the baseline. (OAPF IIA, Section 5, pp91-94).	See response to refs ES.12 and ES.13. The testing of alternatives for the London Plan was undertaken in two iterations of the IIA: the IIA for the Consultation draft replacement London Plan (Spatial Development Strategy for Greater London) (Entec, October 2009) as well as the IIA of the FALP (Amec, December 2013)	IIA for the Consultation draft replacement London Plan (Spatial Development Strategy for Greater London) (Entec, October 2009) IIA of the FALP (Amec, December 2013)
Assessment of spatial options	2.2.9	A Transport Strategy for the OAPF was also prepared in 2015, however, the following should be noted: "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" Appendix B, B.13.1 (p151 PDF)	See response to ref ES.10.	
Assessment of spatial options	2.2.10 to 2.2.12	The FALP sets out the Policy for the Opportunity Areas in **Policy 2.13, pp76- 77.** Particular attention is drawn to **part B (c) Planning Decisions:** "Development proposals within opportunity areas and intensifications areas should: c Contribute towards meeting (or where appropriate), exceeding the minimum guidelines for housing and/or estimates for employment	See responses to ref ES.11. to ES.14.	

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		capacity set out in Annex 1, **tested as appropriate** through opportunity area planning frameworks and/or local development frameworks." **[emphasis added]** The National Planning Practice Guidance (NPPG) also provides specific advice on the assessment of alternatives: "The sustainability appraisal needs to compare **all reasonable alternatives** including the preferred approach and assess these against the baseline environmental, economic and social characteristics of the area **and the likely situation if the Local Plan were not to be adopted**." **NPPG 018 [emphasis added]** Given the relatively small area of the Opportunity Area and its regeneration focus, then it would have been appropriate to test the alternative of **'business as usual'** or **'do nothing'** to provide a comparison of the change and scale of impact that is expected to result, particularly in relation to existing occupants and land uses.		
Assessment of spatial options	2.2.13 to 2.2.16	The OPDC Local Plan sets out an ambitious Spatial Vision & Strategic Policies for the regeneration of the area, which aim to deliver: high density; commercial, industrial and residential development; new mixed-use development; significant new infrastructure and services; and the provision of new open space. The Local Plan sets out the key 'challenges' (p13) to achieving the vision as: • The Role of Park Royal and Old Oak and Strategic Industrial Land • Higher Density Development	See response to ref ES.19.	

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		□ Climate Change and infrastructure provision □ Deliverability and viability of development and infrastructure □ Diversity of Housing □ Competing demand for space – including open space and services □ Adaptability and phasing □ Managing traffic and construction and the need for new transport infrastructure. Yet, despite the significant challenges identified in delivering the Local Plan, the only spatial issue to be considered at all within the IIA has been affordable housing provision. The Spatial Options should have included the following suggested alternatives or combinations of options: □ Extent of SIL re-designation and industrial intensification □ Quantum/mix of development □ Location of development □ Variation in densities/locations for tall buildings □ Infrastructure requirements – transport, open space □ Phasing and deliverability The above spatial options have not been tested at any stage of the SA process (see Annex 1 to this report). It can therefore not be determined whether any of the identified 'challenges' can be overcome. The IIA therefore shows a complete lack of transparency in how decisions in the Plan have been made.		
Assessment of spatial options	2.2.17	Owing to the significance of the Strategic Industrial Land within the Opportunity Area, alternatives to its release and re-designation were essential issues for consideration. Other options should also have tested whether the proposed	See responses to refs ES.7, ES.12 and ES.13.	

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		quantum, mix, distribution and density of development or the proposed transport and open space infrastructure, would deliver the most appropriate strategy.		
Assessment of spatial options	2.2.18	The guidance also states that the alternatives considered must be realistic and deliverable. There are several issues, which are currently uncertain or untested within the Old Oak Area, particularly in relation to infrastructure provision. For example, the provision of stations, the alignment of roads and rail networks and the quantum and location of open space. Such infrastructure provision will have significant impacts upon the spatial strategy and the phasing, deliverability and viability of development, which should have been assessed through the IIA.	See response to ref ES.13.	
Assessment of spatial options	2.2.19	In addition, the quantum of development that is proposed for allocation within the Local Plan period (20,100 homes and 40,400 jobs) is actually lower than the London Plan target, and is in effect a reasonable alternative, which contradicts the reasons given in the IIA for not testing other alternative options.	See response to ref ES.16	
Assessment of spatial options	2.2.20	An assessment of options with regard to the 'Places' identified has also not been carried out. It would appear that the 'Places' were defined through the Opportunity Area Planning Framework (a non-statutory document) but this is not explained within the IIA and the rationale has not been tested. Had an assessment of potential 'Places' been incorporated within an assessment of Spatial Strategy Options, this omission may not appear so significant. As a consequence, the reader cannot understand whether the defined 'Places' are appropriate or not.	There is huge diversity across the OPDC area in terms of land use, transport access, environment, topography, communities and heritage. Each Place is defined by its existing character and context, future opportunities and challenges, land ownership and in response to recommendations by the community. The IIA would not be an appropriate tool for determining if alternative Places could or should be defined. Assessment of the use of a place based approach was undertaken within the IIA in relation to Regulation 18 Local Plan policy OSP5 and Regulation 19(1) and 19(2) Local Plans policy SP6. These assessments demonstrated that the majority of effects against each of the [place] policies are	

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			predicted to be positive (Regulation 18 IIA – section 7.2.1 and Regulation 19(1) and 19(2) – section 7.4.1).	
Assessment of spatial options	2.2.21	It is clear from the London Plan policy, OAPF and the SA regulations and guidance that different Spatial Options needed to be tested to ensure the selection of the most appropriate strategy for the regeneration of the area. It is evident from the findings above that a sustainability assessment of the spatial options has not been undertaken and can therefore not have informed the development of the Plan. The SA is therefore totally deficient.	See responses to refs ES.12, ES.13 and ES.19.	
Assessment of Policy Options	2.2.22 to 2.2.23	An assessment of some policy options was carried out in the Regulation 18 version of the IIA. However, there is no explanation within the IIA of what those policy options were or the reasons for their selection. There is also no explanation of the reason alternatives were rejected. Again, the regulations and guidance are clear on this issue: "The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented." **NPPG 018**	See response to ref ES.17.	

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Assessment of Site Options	2.2.24 to 2.2.26	The Local Plan includes 34 site allocations out of a total 55 sites that were originally considered. The IIA has only considered the allocated sites in its assessment. All of the sites should have been assessed against the IIA framework and reasons for the selection and rejection of alternatives provided. The site allocations are not shown on a plan or listed by name within the IIA. Only a site number is provided, which makes the results very difficult to interpret. The site allocations within each 'Place' have all been scored the same, which is unlikely, with no description of the type or quantum of development being assessed. The assessment also fails to take account of the baseline scenario, against which the impact should be tested. Instead the assessment focuses on what could be achieved by the policy, if implemented, and is extremely broad brush. The regulations and guidance are clear: "The term 'baseline information' refers to the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan, and their likely evolution without implementation of new policies. Baseline information provides the basis against which to assess the likely effects of alternative proposals in the plan." NPPG 011	See responses to refs ES.18 Local Plan paragraph 3.83 identifies that site allocations are used to help OPDC demonstrate its supply of land for new housing, commercial and industrial floorspace. Therefore they are used to help to deliver the homes and jobs capacity within each of the place policies. The IIA assessed the Place Policies, which include housing and jobs targets, for their likely impacts against the Objectives in the IIA Framework. The assessment results of the Place Policies considered the baseline evidence, not only through direct consideration, but also through the intrinsic nature of the IIA Framework, which is based on the baseline developed through Stage A of the IIA process. The IIA operates at a strategic level and, as such, appraisals of sites within close proximity to one another that are of similar sizes, facing similar constraints and proposed for similar types and quantities of development would be highly likely to receive similar assessment results. The IIA Objectives have been developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issue and opportunities. Because baseline data were a key consideration in forming IIA Objectives and their indicators and so provided a clear basis against which to assess the effects of options. The appraisal of each option against each IIA Objective was essentially an identification and evaluations of the option's effects on the IIA Objective in comparison with the existing baseline. This is explained in the IIA methodology of the Reg 19(2) report. In some cases, the appraisals explicitly state that the identified effects would be more positive, or more adverse, than the existing baseline. For example, the appraisal of	

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			Policy P6 against IIA Objective 13 concludes: *"These improvements could create significant benefits against this objective above the existing baseline."*	
Assessment of Site Options	2.2.27	As a result of the above error, the IIA has failed to consider the impact of the policies and proposals on the existing land uses and occupants. This is particularly important given the proposed release of SIL and its re-designation for housing and commercial land uses.	See responses to refs ES.12, ES.13 and ES.19. Social impacts for socio-economic groups, as opposed to individuals, were assessed as part of the IIA. Public consultation on the Local Plan and IIA was undertaken at numerous stages through its development. Opportunities were therefore available for current land users to provide comment. However, this is the first time that Old Oak Park Limited (OOPL) have felt it necessary to provide comment. Indeed OOPL were supportive of the allocation of the Cargiant site for development until late 2018. OOPL's planning consultants, DP9, also made representations on the draft London Plan on 2 March 2018 within which it was stated that "OOPL wholly supports the pro-development approach that runs as a theme throughout the Draft London Plan, especially with regard to Opportunity Areas".	DP9 Representations on the Draft London Plan on behalf of Old Oak Park Limited dated 2 March 2018
Assessment methodology	2.2.28 to 2.2.31	The assessment methodology identified for use in the IIA (**p49**) is in line with the regulations, however, the application of the methodology is considered flawed. Examples of some of the errors in the assessment in relation to Old Oak North are set out below. A summary of the policy impacts for the Places Chapter is set out below: "The majority of effects against each of the policies are predicted to be positive. An overarching highlight against each Place policy is listed below, with recommendations for the Places chapter provided. An intensification of development in this area and for this duration will bring about its challenges for not just the existing	The Local Plan evidence base includes a 'Decontamination Study' (June 2018), If it is necessary to be undertaken remediation of land will be secured as part of the development control process. The development management stage is the most appropriate point for individual site assessment in terms of land contamination and if necessary the securing of appropriate mitigation measures (see Policy EU13 of the Local Plan). It is regarded that any remediation of contamination, to allow for redevelopment, would lead to positive effects overall, as potential pollution pathways would be reduced.	Decontamination Study (June 2018)

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		residents and businesses but also those who start to move in amidst the change. **How these impacts will be felt across the OPDC area and beyond it, particularly on the existing road network and to existing businesses and residents will rely heavily on strong policies elsewhere in the Local Plan so as to minimize the scale and cumulative aspects of those impacts.** As such, the direction of the Place policies, their clusters and any site allocations give have been considered in light of the other Local Plan policies being proposed." **IIA 7.4.1, p69 (emphasis added)** Given the identified challenges for the development of the area, it is not known how the majority of effects can be positive. The detailed assessment results show further errors. For example, the assessment of **Policy P2** and site allocations **A2, A3 and A4 (Appendix D, PDF page 199 - no page numbers are given in document)** against **Objective 3:** 'Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land', are provided below: "P2 The whole of OPDC is in an area of previously developed land. It is likely that remediation will be required given the historic uses present on site, but this isn't stated in the policy or the supporting text. (+)		

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		Sites: All development in the OPDC area is on previously developed land, so these allocations will score positively against this objective. (+)" All of the above allocations are given a minor positive impact. Given the unknown nature of contamination, the result cannot be positive and is at best uncertain. The assessment should link to the evidence available on this matter e.g. a contaminated land study, and the implications of remediation on deliverability and viability of development. The assessment has also failed to identify any necessary mitigation measures.		
Assessment methodology	2.2.32 to 2.2.33	The assessment results against **Objective 18:** 'To encourage inward investment alongside investment within existing communities, to create sustainable economic growth', are also flawed. "P2 The policy wording encourages flexible workspace typologies at locations adjacent to transport or utilities infrastructure. The requirement for the Harlesden Enhancement Strategy will support the continued functioning of Harlesden District Town Centre to the north. This should help to provide benefits against this objective. Further benefits in terms of connections to Harlesden town centre, could further deliver sustainability benefits. Boroughs Providing new, high quality homes in the OPDC area can attract investment. Sites: The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective."	The viability of the Local Plan has been assessed as part of the Whole Plan Viability Study and the Affordable Housing Viability Assessment.	Whole Plan Viability Assessment Affordable Housing Viability Assessment

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		The assessment fails to consider the existing land use constraints of the specific sites being assessed or the potential need for relocation of existing employment uses; and consequences this may have upon delivery and viability.		
Assessment methodology	2.2.34 / 2.20.35	The assessment results provide generic, optimistic assumptions, which have not considered the baseline scenario or the evidence base available. Another example, is with regard to Objective 17: 'Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training'. "It can be assumed that site allocations that contributes housing will have some associated social infrastructure contained within it. The site allocations are located near employment opportunities and sustainable transport links. This will make jobs in other locations in London more accessible." Whilst, the above statement may be a fair assumption, the purpose of the IIA is to assess the likely significant impacts of implementing the Local Plan. Where information is identified, through the evidence base, it should be considered in the assessment. As a consequence, the IIA does not demonstrate that it is either robust or credible.	The assessment results considered the baseline evidence, not only through direct consideration, but also through the intrinsic nature of the IIA Framework, which is based on the baseline developed through Stage A of the IIA process.	
Cumulative effects	2.3.1	The cumulative effects are set out in Table 7.12, pp76-78 of the IIA. The results are very simplistic and again make very broad-brush statements, which are not linked to the baseline data or evidence. For example, the impact upon economic inclusion is regarded as positive because of the jobs that will be created.	Cumulative effects were an inherent feature of the assessment process, incorporated into the assessment results discussed in Chapter 7 of the Reg 19(2) IIA. The summaries of assessments grouped relevant policies together (e.g. policies from the Environment Chapter) in the OPDC Plan as this enabled the IIA to consider all policies that would be likely to have cumulative impacts in-combination.	Integrated Impact Assessment Report on the Regulation 19(2) Second Revised Draft Local Plan (May 2018)

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
		However, there is no discussion of the potential cumulative impacts of the loss of existing employment uses or the need for relocation of businesses. Similarly, the impact upon access to goods and services is regarded as positive with no discussion of the challenges for the implementation of the transport infrastructure and potential impacts upon air quality and congestion during construction, and in operation until the proposed infrastructure is complete.		
Mitigation measures	2.4.1 to 2.4.3	**Schedule 2 (7)** of the regulations sets out the information, which should be included within the SA report, including the requirements for mitigation measures. "The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme." The IIA states at page 67: "The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in Appendix D." The mitigation measures are not set out within the SA Report or within Appendix D but instead a general reference is made to the Local Plan policies for mitigation. It is not clear what type of mitigation measures have been identified for specific issues.	The Reg 19(2) IIA (May 2018) states as follows: "An appraisal was previously undertaken in 2017, the Draft Local Plan was then amended in light of this and this IIA Report has now been updated with track changes to reflect the latest version of the Plan. The next two chapters represent the latest results of the appraisal and also summarise the key areas of difference between the latest version and the previous version of the Draft Local Plan". (Section 4.4) "Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Local Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified. Recommendations within Appendix D are italicised for clarity. As the Regulation 19(2) Second Revised Draft Local Plan has been developed in parallel to the SA process, mitigation measures have been incorporated on a continual basis into the Local Plan." (Section 4.5)	Integrated Impact Assessment Report on the Regulation 19(2) Second Revised Draft Local Plan (May 2018)

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
Consultation	2.5.1	The Consultation responses to the Reg 18 and 19(1) consultations are provided at **Appendix C** of the IIA. However, there is no explanation within the SA report on the issues raised in the consultations and how these have been taken into account in decision-making. In particular, the issue raised with regard to the need to assess alternative strategic options or reasonable alternative options, which have not been tested in the regulation 18 and 19 versions of the Local Plan. Reasonable Strategic Options, other than affordable housing provision exist (as set out in this report) and should have been considered.	Appendix C to the Regulation 19 IIA contains the consultation responses to the Draft IIA reports and how they have been addressed.	Integrated Impact Assessment Report on the Regulation 19(2) Second Revised Draft Local Plan (May 2018) - Appendix C
Appendices	Reg 19 (2)	Chapter 6 - Allocation of Alternatives Chapter 6 sets out a compatibility assessment of the narratives attached to the Spatial Vision. This is not an assessment of alternatives against the baseline scenario. Chapter 8 – Policy Alternatives Chapter 8 provides the Proposed SA monitoring framework, it is not Policy Alternatives Appendix D – Assessment of Preferred Policy Options Appendix D is the Preferred Policies Assessment, it does not include options	See response to refs ES.12 and ES.13.	
Appendices	Reg 19 (2)	Chapter 2, Section 8.1, 8.2 – origins of the alternatives dealt with Chapter 2 sets out the stages in the IIA process, which states that the Options were evaluates and selected at the Regulation 18 stage Section 8.1 and 8.2 relate to monitoring not the selection of alternatives	See response to refs ES.12 and ES.13.	
Appendices	Reg 19 (2)	Chapter 3 – approach and method, including difficulties Chapter 3 deals with Stage A - Setting the Context and Objectives, Establishing the Baseline	See response to refs ES.12 and ES.13.	

Chapter/ Section	Ref.	Issue / Point raised by Jam Consulting, on behalf of Cargiant	OPDC Response	Document Reference
		and Deciding on the Scope. Section 3.4 deals with assessment of alternatives, which explains that no reasonable alternatives have been assessed owing to the FALP requirements. No difficulties are identified.		
Appendices	Reg 19 (1)	Chapter 5 – Strategic Options Chapter 5 sets out the appraisal of Strategic Options, which only includes options for Affordable Housing Chapter 7 – Policies Chapter 7 provides an assessment of the preferred policies and provides no explanation or narrative on policy options Appendix D – Assessment of Preferred Policy Options Appendix D is the Preferred Policies Assessment, it does not include options Appendix F -Table of how SEA Regulations have been met	See response to refs ES.12 and ES.13.	
Appendices	Reg 18	IIA Reg 18, Appendix F (PDF pp 195-199) sets out the Strategic Options assessment, which includes only affordable housing provision. Appendix G – Policy Options – includes some options to policies but these are not explained in the Appendix or main SA report There is no table which shows how the SEA regulations have been met. There is no Appendix or information which assesses or explains the 'Overarching Strategic Options' considered before Regulation 18.	See response to refs ES.12 and ES.13. The Regulation 18 IIA is compliant with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 notwithstanding that a summary table setting out such compliance has not been included within the report.	IIA for Draft Regulation 18 Consultation (4 February 2016)

APPENDIX G

Assessment of Policy Options, Preferred Policy Options and Alternative Options

The tables below provide an explanation of the notation used in the assessment matrices.

Performance of Policy

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

Temporal Scale

L-T	Effects likely to arise in 10-25 years of Local Plan implementation
M-T	Effects likely to arise in 5-10 years of Local Plan implementation
S-T	Effects likely to arise in 0-5 years of Local Plan implementation
D	Direct effects.

I	Indirect effects.
R	Effects are reversible
IR	Effects are irreversible
H/M/L	High, medium or low certainty of prediction

Table G-1 Chapter 3: The Overarching Spatial Policies

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

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	OSP1	+	L-T, I, R, L	London-wide	The policy is likely to contribute to the enhancement of the built environment through optimising the use of brownfield land and supporting the regeneration of the area as well as the wider area.
		OSP2	++	L-T, D, R, M	OPDC area and surrounding boroughs.	The policy includes the support of proposals that will deliver a thriving new centre, to accommodate a significant number of new homes and jobs, as well as protecting the Park Royal industrial estate. This could contribute to the achievement of enhancements to the built environment locally as well as encourage 'place-making' – the policy also requires the delivery of a 'full mix' of town centre uses and associated infrastructure within a new town centre hierarchy. Supporting text indicates the types of uses encouraged, which would include new shops, culture, sports and leisure infrastructure such as new schools, health centres and community space. This could lead to benefits against this objective in the long term.
		OSP3	++	L-T, D, R, M	OPDC area and surrounding boroughs.	The policy should help to deliver improvements to the existing built environment, which could lead to significant positive benefits. The creation of a well-connected and legible network of high quality and varied public, communal and private amenity spaces based on the celebration of existing features, should help to create a sense of place and local distinctiveness.
		OSP4	+	L-T, I, R, M	Town centres within OPDC area and surrounding boroughs.	Focusing the highest densities of development in the centre of the area could also help to develop a sense of place locally in the long term and ensure that the areas around the stations and town centres are well connected. However, the key issues as stated in the Local Plan text highlight that *'Well-designed high density and tall building development can play a positive role in creating vibrancy and a sense of place. To be successful, such buildings should be exemplar and ensure the creation of a liveable place and avoid poor quality environments*.' ' Paragraph 3.22 states that *"Tall buildings must achieve the highest standards of design, be mindful of their surrounding context and accord with the requirements set out in national guidance, the London Plan and the draft preferred policy options of this Local Plan"* The supporting text to the policy states that 'sensitive locations' are considered to be

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						areas adjacent to designated heritage assets, existing public amenity spaces and existing residential communities. Lower densities in these areas could help the design of development to integrate into the local area and create a sense of place. *See recommendation under objective 12.*
		OSP5	++	L-T, D, R, M	OPDC area and surrounding boroughs.	The policy states that OPDC will support proposals that 'create a series of attractive and locally distinctive places and lifetime neighbourhoods'. Proposals should also 'clearly demonstrate early engagement with existing residents and business to inform place-making'. Small and large-scale catalyst uses will also be supported to drive regeneration and help to generate a sense of place. These requirements should lead to significant benefits against this objective.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	OSP1	++	M, L-T, D, R, M	OPDC area	The policy seeks to deliver a significant quantum of new homes, jobs and supporting services on brownfield land, which could have direct significant benefits against this objective.
		OSP2	+	M, L-T, I, R, L	OPDC area	The policy seeks to deliver a significant amount of development on brownfield land, which could lead to benefits against this objective.
		OSP3	0			The policy is not related to the density of development specifically.
		OSP4	+	M, L-T, D, IR, M	OPDC area	The policy specifically refers to the need for high density development in appropriate locations across the plan area. This could lead to benefits against this objective.
		OSP5	0			The policy is not related to the density of development specifically.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	OSP1	++	S, M, L-T, D, R, M	OPDC area	The policy seeks to optimise the development of brownfield land, which could have direct significant benefits against this objective. *It is recommended that the policy specifically refers to the use and remediation of contaminated land as that which should be optimised, should there be an option within the site [NB this is now covered in Policy EU12].*
		OSP2	++	M, L-T, I, R, L	OPDC area	The policy seeks to deliver a significant quantum of development on brownfield land, which could lead to benefits against this objective.
		OSP3	+			The policy promotes development on brownfield land and could lead to benefits against this objective.
		OSP4	++	M, L-T, D, IR, M	OPDC area	The policy specifically refers to the need for high density development in appropriate locations across the plan area. This could lead to benefits against this objective.
		OSP5	+			The policy promotes development on brownfield land and could lead to benefits against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	OSP1	++	L-T, I, R, M	London-wide and national	As explained in the policy supporting text, optimising development in this strategic location could have London-wide benefits for accessibility by sustainable modes of transport, with the potential for benefits to reach more widely.
		OSP2	++	L-T, I, R, L	OPDC area	The policy seeks to deliver a range of land uses within the area, including homes, jobs and associated town centre infrastructure. This could help to reduce the need to travel for both existing and incoming communities, which could have long term benefits against this objective.
		OSP3	++	L-T, D, R, M	OPDC area	The development of an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected and legible, is likely to encourage walking and cycling as modes of transport, which could have benefits against this objective. *The policy could specify that improvements will seek to prioritise non-motorised uses within the street-scene, and encourage lower vehicle speeds through design [NB this is now covered in Policy T1].*
		OSP4	++	L-T, I, R, M	London-wide and national	As set out in the supporting text, part of the rationale behind encouraging high density development in this location is to optimise the area's excellent public transport accessibility. This is reflected in the policy wording, which seeks that the highest density development is focussed around Old Oak Common Station, with high density development also focussed around other stations, with a mix of densities at key destinations. These policy requirements could help to improve accessibility and encourage a modal shift to more sustainable transport use in this area as well as more widely.
		OSP5	+			The policy promotes the potential for large-scale catalyst uses to be located in the OPDC area. These uses are likely to generate significant trip numbers and it is appropriate that these sorts of uses are located in areas of high public transport access such as the OPDC area.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a	OSP1	+	M, L-T, I, R, M	West London and London wide	As explained in the policy supporting text, optimising development in this location could contribute to meeting London's identified need for homes, thereby contributing to the achievement of benefits against this objective. However, the types of homes are not specified within this policy.
		OSP2	++	M, L-T, D, R, M	West London and London wide	The policy specifies that the delivery of 24,000 homes will be supported in the Old Oak area, with 1,500 new homes to be delivered in Park Royal. However, the types of homes are not specified within this policy. Local Plan policies H4-H10 provide more detail in relation to housing types and tenures.
		OSP3	0			The policy will not directly contribute to benefits against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	range of types and tenures, to meet identified local needs	OSP4	+	M, L-T, D, R, M	West London and London wide	The policy seeks to deliver housing in appropriate locations, which could lead to benefits against this objective. However, the types of homes are not specified within this policy. Local Plan policies H4-H10 provide more detail in relation to housing types and tenures.
		OSP5	+			The policy references the importance of delivering lifetime neighbourhoods, which extols the importance of providing a range of housing types and tenures.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	OSP1	+	M, L-T, D, IR, L	OPDC area and surrounding boroughs	Optimising development in this brownfield location, which is largely at low risk of flooding, could indirectly help to reduce the pressure for development in areas, including greenbelt, which may be more susceptible to flood risk. However, some areas within the OPDC area are at risk of flooding. If these areas are developed, this could lead to negative effects, if not adequately mitigated. In addition, new large scale development could increase areas of hardstanding and built development, which could have negative effects in terms of surface water and sewer flooding, as well as contributing to increased microclimatic temperatures, if not adequately mitigated. However, this impact should be mitigated through the other policies of the Local Plan such as Policy EU3.
		OSP2	+/-	M, L-T, D, IR, L	OPDC area and surrounding boroughs	A significant increase in development could lead to an increase in hardstanding and built development, which could have negative effects in relation to surface water and sewer flooding. *This should be mitigated through the other policies of the Local Plan.*
		OSP3	+	M, L-T, D, R, M		*It is unclear what is meant by 'b) the highest standards of design for the public realm that can positively accommodate change over time' – should this mean adapting to climate change through the use of SuDS, this could be specified. The policy does refer to the need to respond to environmental change, however.*
		OOSP 4	+/-	M, L-T, D, IR, L	OPDC area and surrounding boroughs	A significant increase in the density of development could lead to an increase in hardstanding and built development, which could have negative effects in relation to surface water and sewer flooding. *This should be mitigated through the other policies of the Local Plan.*
		OSP5	?			The policy will not directly contribute to benefits against this objective.
7	To minimise contributions to climate change through	OSP1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Optimising development in this location could help to create efficiencies in the potential for improving energy efficiency through shared generation facilities, as well as improving the viability of sustainable transport infrastructure. However, the increase in the demand for energy may outweigh these potential benefits. *Reducing the need for energy should be encouraged through site layouts and sustainable design. This could be referenced in the design policies of the Local Plan.*

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	OSP2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	A significant increase in development in this location could increase pressure on the need for resources, which could lead to negative effects against this objective. However, the mix of uses may lead to potential efficiencies through reducing the need to travel as well as the potential for shared energy generation and waste management facilities.
		OSP3	++	L-T, D, R, M	OPDC area	The development of an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected and legible, is likely to encourage walking and cycling as modes of transport, which could have benefits against this objective. *The policy could specify that improvements will seek to prioritise non-motorised uses within the street-scene, and encourage lower vehicle speeds through design – cross-reference could be made to Policy T1.*
		OSP4	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Optimising development in this location could help to create efficiencies in the potential for improving energy efficiency through shared generation facilities, as well as improving the viability of sustainable transport infrastructure. However, the increase in the demand for energy may outweigh these potential benefits. *Reducing the need for energy should be encouraged through site layouts and sustainable design. This could be referenced in the design policies of the Local Plan.*
		OSP5	?			The policy will not directly contribute to benefits against this objective.
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	OSP1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Optimising development in this location could help to create efficiencies in the potential for improving waste management through shared facilities and the creation of a circular economy. However, the increase in the generation of waste through the extensive construction period of the development and the potential displacement of waste to neighbouring boroughs may outweigh these potential benefits. *Sustainable design and increasing the use of recycled materials during construction should be encouraged. This could be cross-referenced to Policy Eu5.*
		OSP2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	A significant increase in development in this location could increase pressure on the need for resources, which could lead to negative effects against this objective. However, the mix of uses may lead to potential efficiencies through the potential for shared waste management facilities and the creation of a circular economy. *This could be specified in the supporting text and cross-reference to Policy EU5.*
		OSP3	0			The policy will not directly contribute to benefits against this objective.
		OSP4	+/-	S, M, L-T, D, IR, L	OPDC area and	A significant increase in development in this location could increase pressure on the need for resources, which could lead to negative effects against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	as composting of all green waste				surrounding boroughs	However, the mix of uses may lead to potential efficiencies through the potential for shared waste management facilities and the creation of a circular economy. *This could be specified in the supporting text and cross-referenced to Eu5.*
		OSP5	0			The policy will not directly contribute to benefits against this objective.
9	Improve the quality of the water environment	OSP1	+/-	S, M, L-T, D, R, L	OPDC area and surrounding boroughs	The water quality in local area is currently low. Optimising development in this location could have benefits for water quality in the long term, in that development could lead to the remediation of contaminated land as well as replacing potentially contaminating land uses with housing development and 'cleaner' employment uses. This could reduce the runoff of contaminated water entering the water environment. However, this will be dependent on the efficiency of remediation and clean-up operations as well as the infrastructure to be developed to support new development. Increased development densities could also have negative effects on the water environment through increased demand for resources.
		OSP2	+/-	S, M, L-T, D, R, L	OPDC area and surrounding boroughs	The water quality in local area is currently low. Regeneration in this location could have benefits for water quality in the long term, in that development could lead to the remediation of contaminated land as well as replacing potentially contaminating land uses with housing development and 'cleaner' employment uses. This could reduce the runoff of contaminated water entering the water environment. Increased development densities could also have negative effects on the water environment through increased demand for resources.
		OSP3	?			It is assumed that sustainability covers the water environment to a degree. *However. It is unclear what is meant by 'b) the highest standards of design for the public realm that can positively accommodate change over time' – should this mean adapting to climate change through the use of SuDS, this could be specified.*
		OSP4	+/-	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Increased development densities could have negative effects on the water environment through increased demand for resources, if not adequately mitigated. *It is recommended that water efficiency measures are designed into developments from the outset. This is addressed in Policy EU3 of the Local Plan.*
		OSP5	?			The policy will not directly contribute to benefits against this objective. *See recommendation under Objective 7.*
10	Create and enhance biodiversity and the	OSP1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The area includes a Local Nature Reserve (Wormwood Scrubs) and a nature conservation area of Metropolitan Importance adjacent to the Grand Union Canal. Anecdotal evidence as part of the scoping workshop has suggested that some of the brownfield areas within the site may have importance for biodiversity through the presence of colonising species. Optimising development in this location could have

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	diversity of habitats across the area and its surroundings					benefits for biodiversity in the long term, in that development could lead to the remediation of contaminated land as well as replacing potentially contaminating land uses which could improve soil quality. However, the density of development proposed could reduce the potential for biodiversity through a decrease in the potential land available for enhancement measures as well as increasing the local population, which could increase disturbance. Certainty in the prediction of effects is considered to be low. The construction period in the short and medium terms could have particularly negative consequences, as existing biodiversity resources on brownfield sites could be lost. This should be protected through Policy EU8.
		OSP2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The development proposed could reduce the potential for biodiversity through a decrease in the potential land available for enhancement measures as well as increasing the local population, which could increase disturbance. However, the replacement of industrial land overall with green infrastructure would provide opportunities. The construction period in the short and medium terms could have particularly negative consequences, as existing biodiversity resources on brownfield sites could be lost. This should be protected through Policy EU8. *It is recommended that a management plan or similar be developed, in order to guide development proposals. This could link to a wider green infrastructure strategy (See policy EU8), to ensure a holistic approach across the plan area. A Green Infrastructure strategy would be beneficial.*
		OSP3	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy seeks to 'celebrate' existing amenity spaces including the canalside nature reserve, Wormwood Scrubs and the Grand Union Canal. This could lead to benefits against this objective, should the 'celebration' lead to enhancement and management of the biodiversity of these assets. *Although hinted towards in the supporting text (including a reference to Policy EU8), It is recommended that this policy set out, as part of the strategic connections, that multi-functional green infrastructure will form a key part of the overall strategic plan and linkages. This could provide benefits for flood and surface water management, biodiversity, micro-climate, alongside the existing requirements for human connectivity.*
		OSP4	-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The area includes a Local Nature Reserve (Wormwood Scrubs) and a nature conservation area of Metropolitan Importance adjacent to the Grand Union Canal. Anecdotal evidence as part of the scoping workshop has suggested that some of the brownfield areas within the site may have importance for biodiversity through the presence of colonising species. Increased development densities could have negative

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						effects on the biodiversity through increased demand for land resources and disturbance. Certainty in the prediction of effects is considered to be low although note that EU8 requires no net loss of biodiversity. *Recommendation: Need for biodiversity policy to identify that there is also biodiversity in areas not identified as SINCs and that this biodiversity should also be safeguarded or replaced to equal biodiversity value. Also recommend a GI strategy.*
		OSP5	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to 'celebrate' existing features of the Grand Union Canal, Wormwood Scrubs which would benefit this SA Objective
11	To minimise air, noise and light pollution, particularly for vulnerable groups	OSP1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Optimising development in this location could have benefits for air, noise and light pollution in the long term, in that development could lead to the replacement of potentially polluting industrial land uses in some areas. Further, the improvements in transport infrastructure could reduce levels of pollution from this source. However, the density of development proposed could reduce the potential for pollution through an increase in the local population, which could increase traffic levels as well as built development and its associated light and noise pollution in particular. The construction period in the short and medium terms could have particularly negative consequences through the generation of dust, night working and pollution related to traffic. This should be minimised through the environment policies contained within the Local Plan.
		OSP2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Development in this location could have benefits for air, noise and light pollution in the long term, in that development could lead to the replacement of potentially polluting industrial land uses in some areas. However, the density of development proposed could reduce the potential for pollution through an increase in the local population, which could increase traffic levels as well as built development and its associated light and noise pollution in particular. The construction period in the short and medium terms could have particularly negative consequences through the generation of dust, night working and pollution related to traffic. This should be minimised through the environment policies contained within the Local Plan.
		OSP3	+	L-T, D, R, M	OPDC area	Insofar as the development could lead to an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected and legible, this is likely to encourage walking and cycling as modes of transport, which could have benefits against this objective. *The policy could specify that the network will be accessible as well as legible, to accommodate vulnerable groups.*
		OSP4	+/-	L-T, D, R, M	OPDC area	Insofar as the development could lead to an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						is well-connected and legible, this is likely to encourage walking and cycling as modes of transport, which could have benefits against this objective. However, the density of development proposed could reduce the potential for pollution through an increase in the local population, which could increase traffic levels as well as built development and its associated light and noise pollution in particular.
		OSP5	0			The policy will not directly contribute to benefits against this objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	OSP1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There are a number of undeclared heritage assets in the area. Therefore, optimising development in this location could lead to negative effects should these assets not be recognised as part of the regeneration of the area. However, the regeneration of the area could also lead to benefits in the medium and long-term, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. However, this is not specified in the policy. See Policy D6,
		OSP2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There are a number of undeclared heritage assets in the area. Therefore, development in this location could lead to negative effects should these assets not be recognised as part of the regeneration of the area. However, the regeneration of the area could also lead to benefits in the medium and long-term, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. However, this is not specified in the policy. However, this is not specified in the policy. See Policy D6,
		OSP3	++	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy specifically seeks to 'celebrate' existing amenity spaces including the heritage asset St Mary's Cemetery. This could lead to benefits against this objective, should the 'celebration' lead to enhancement and management of this asset. *It is recommended that the policy could include reference to the celebrating the wider historic environment across the area, including improving legibility and the setting of other designated and undesignated heritage assets and conservation areas. This would be complementary to improving the design of the public realm alongside the development of a green infrastructure network.*

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		OOSP 4	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There are a number of undeclared heritage assets in the area. Therefore, development in this location could lead to negative effects should these assets not be recognised as part of the regeneration of the area. However, the regeneration of the area could also lead to benefits in the medium and long-term, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. However, this is not specified in the policy. See Policy D6. The supporting text to the policy states that 'sensitive locations' are considered to be areas adjacent to designated heritage assets, existing public amenity spaces and existing residential communities. *It is recommended that point e) of the policy is reworded to 'sensitive locations' as opposed to 'sensitive edges' to be consistent with the definition in the supporting text and to improve implementation.*
		OSP5	++	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy should lead to the enhancement of the historic environment through a focus on creating a series of attractive and locally distinctive places. Heritage is specified in the supporting text as a contributor to the identification of local distinctiveness. *It is recommended that background studies to inform the development of place-making also include the development of a local historic environment study, to identify any locally important heritage assets. These could form part of the identification of 'valued buildings' as set out in the supporting text to the policy.*
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	OSP1	+	M, L-T, I, R, L	West London and London wide	As explained in the policy supporting text, optimising development in this location could contribute to meting London's identified need for homes, thereby contributing to the achievement of benefits against this objective. The delivery of an improvement in economic prosperity and the delivery of strategic infrastructure could have long term benefits for community cohesion. This could be delivered through policy SI1.
		OSP2	+	M, L-T, I, R, L	West London and London wide	The development of a new part of London could lead to an increased sense of community cohesion over the existing situation, as they development would generate a significant number of housing and jobs over the long term. The delivery of a 'full mix' of town centre uses, including schools, health centres and community space, could ensure that a sense of community and welfare is created. *The policy should specify requirements in relation to the quantum of services and facilities to be provided in relation to the incoming population.* This should be delivered through the Social Infrastructure policies of the Local Plan and the infrastructure table in the delivery and implementation chapter.
		OSP3	++	L-T, D, R, M	OPDC area	The development of an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						and legible, is likely to encourage walking and cycling as modes of transport, which could lead to benefits against this objective as increased community interaction could lead to an increase in a sense of community.
		OSP4	+	M, L-T, D, ID, R, M	West London and London wide	The policy seeks to deliver high density development in areas close to public transport nodes as well as key service areas such as Old Oak High Street. The development supports the delivery of high quality housing, retail, employment space and social infrastructure, which could lead to benefits against this objective through an increase in facilities for direct benefits, and increased community interaction for indirect benefits.
		OSP5	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy clearly states that proposals should demonstrate early engagement with existing residents and businesses to inform place-making. This could lead to significant benefits against this objective, creating a sense of community cohesion and ownership locally.
14	Improve safety and reduce crime and the fear of crime	OSP1	+	M, L-T, I, R, L	West London and London wide	The optimisation of development in this area, including strategic infrastructure that could improve traffic management, could lead to benefits against this objective through improved safety. See Policy D2.
		OSP2	+	L-T, I, R, L	West London and London wide	The development of a mix of uses including housing, employment and community facilities could increase a sense of community cohesion that, in turn, could lead to long term benefits for crime and fear of crime.
		OSP3	+	L-T, D, R, M	OPDC area and surrounding boroughs	The development of an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected and legible, is likely to encourage walking and cycling as modes of transport, which could lead to benefits against this objective as increased community interaction could lead to an increase in a sense of community and a reduction in the fear of crime. *The policy could include a requirement to improve natural surveillance through design measures such as active frontages and open design (including lighting), which could reduce the fear of crime within public spaces. See Policy D2.*
		OSP4	+	L-T, I, R, L	West London and London wide	The development of a mix of uses including housing, employment and community facilities could increase a sense of community cohesion that, in turn, could lead to long term benefits for crime and fear of crime.
		OSP5	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy clearly states that proposals should demonstrate early engagement with existing residents and businesses to inform place-making. This could lead to benefits against this objective, creating a sense of community cohesion and ownership locally. High quality design could also lead to benefits against this objective, depending on the nature of design principles employed. *Active frontages and the principles of Secured by Design should be required – cross-reference to Town Centres chapter.*

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	OSP1	+/-	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	As explained in the policy supporting text, optimising development in this location could contribute to meting London's identified need for homes, thereby contributing to the achievement of benefits against this objective. The delivery of an improvement in economic prosperity and the delivery of strategic infrastructure could also have benefits for health. Strategic infrastructure may increase the use of sustainable transport in the long term, which could have benefits for mental health as a result of community interaction as well as physical benefits through physical activity, such as from walking or cycling. There is potential, however, for short/medium term negative effects to arise during the construction period, through effects such as stress as well as direct effects from pollution including noise, air and light.
		OSP2	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	Development in this location could contribute to meeting London's identified need for homes as well as the provision of health centres, new schools and community spaces, thereby contributing to the achievement of benefits against this objective. The delivery of an improvement in economic prosperity and the delivery of strategic infrastructure could also have benefits for health. There is potential, however, for short/medium term negative effects to arise during the construction period, through effects such as stress as well as direct effects from pollution including noise, air and light.
		OSP3	++	L-T, D, R, M	OPDC area	The development of an improvement to the existing street network connecting stations, key destinations, neighbourhoods and the surrounding areas, that is well-connected and legible, is likely to encourage walking and cycling as modes of transport, which could lead to benefits against this objective as it could increase access to health care, as well as providing indirect health benefits from physical activity and community interaction. *See recommendations under objective 11.*
		OSP4	+/-	S, M, L-T, D, R, L	West London and London wide	Focusing development in accessible locations could have benefits for health in terms of access to facilities as well as community interaction through the increase in the use of public transport, which could have further benefits. *High density housing development in tall buildings, however, may lead to problems in accessibility for some members of the community. Meeting the needs of these members of the community should be considered.*
		OSP5	?			The policy will not directly contribute to benefits against this objective. *However, it is considered that a multi-functional green infrastructure network, which could provide benefits such as pollution sequestration and walking and cycling routes, could contribute to the creation of place and local distinctiveness. This could be added to the list in the supporting text.*

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16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	OSP1	+	M, L-T, I, R, L	West London and London wide	The optimisation of development in this area, including strategic infrastructure that could lead to benefits against this objective. The social infrastructure policies of the Local Plan should provide benefits against this objective.
		OSP2	++	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	Development in this location could contribute to meeting London's identified need for homes and jobs as well as the provision of new schools and community spaces, thereby contributing to the achievement of benefits against this objective. The policy promotes the provision of associated infrastructure to support the new development.
		OSP3	0			The policy will not directly contribute to benefits against this objective.
		OSP4	+	S, M, L-T, I, R, L	West London and London wide	The development of a mix of uses including housing, employment and social infrastructure could improve access to education facilities. Focusing development in accessible locations could have further benefits for accessibility to education and training opportunities in the surrounding areas and across London.
		OSP5	+			The policy identifies that catalyst uses could include educational institutions and this would provide local residents with local opportunities to access higher education.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	OSP1	+/-	S, M, L-T, I, R, L	OPDC area, West London, London wide	As explained in the policy supporting text, optimising development in this location could contribute to driving forward the economic prosperity of the local area as well as the surrounding boroughs. Short term benefits may arise from the generation of employment during the construction period, although negative effects may also arise through the loss of local employment lost through the regeneration activities.
		OSP2	+	S, M, L-T, I, R, L	OPDC area, West London, London wide	As explained in the policy supporting text, the scale of development in the OPDC area can have a profound impact on both the London and the UK economies, providing an additional 65,000 jobs. However, locally, negative effects may also arise through the loss of local industrial employment and businesses lost through the regeneration activities.
		OSP3	0			The policy will not directly contribute to benefits against this objective.
		OSP4	+	S, M, L-T, I, R, L	West London and London wide	The development of a mix of uses including housing, employment and social infrastructure could improve access to employment and training opportunities. Focusing development in accessible locations could have further benefits for accessibility to opportunities in the surrounding areas and across London.
		OSP5	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy clearly states that proposals should demonstrate early engagement with existing residents and businesses to inform place-making. This could lead to benefits against this objective. The policy identifies that catalyst uses could include educational institutions and this would provide local residents with local opportunities to access higher education, including training opportunities.
18	To encourage	OSP1	+	M, L-T, I, R,	OPDC area,	As explained in the policy supporting text, optimising development in this location could

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	inward investment alongside investment within existing communities, to create sustainable economic growth			L	West London, London wide	contribute to driving forward the economic prosperity of the local area as well as the surrounding boroughs.
		OSP2	+	S, M, L-T, I, R, L	OPDC area, West London, London wide	As explained in the policy supporting text, the scale of development in the OPDC area can have a profound impact on both the London and the UK economies. This could have benefits against this objective.
		OSP3	+	M, L-T, I, R, L	OPDC area, West London, London wide	The policy could lead to indirect positive effects against this objective, as an improvement in the local environment and connectivity could improve the attractiveness of the area to inward investors.
		OSP4	+	M, L-T, I, R, L	OPDC area, West London, London wide	The policy could lead to indirect positive effects against this objective, as an improvement in connectivity and accessibility to public transport opportunities could improve the attractiveness of the area to inward investors.
		OSP5	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy clearly states that proposals should demonstrate early engagement with existing residents and businesses to inform place-making. This could lead to benefits against this objective.

Table G-2 Chapter 4: The Places

- P1: Old Oak South
- P2: Old Oak North
- P3: Old Oak High Street
- P4: Grand Union Canal
- P5: Park Royal
- P6: Park Royal Centre
- P7: North Acton
- P8: Scrubs Lane
- P9: Old Oak West
- P10: Wormwood Scrubs

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	As stated in the supporting text, the area specific policy should help to deliver a strong sense of place through development, reflecting and building upon the area's existing character. The vision for the area highlights that Old Oak South will see a new commercial hub, centred on the new Old Oak Common Station. The station, along with the a new London Overground station, will be 'fully embedded' into its surroundings, providing visitors, employees and residents with easy access to west London and the OPDC regeneration area. Wormwood Scrubs and the Grand Union Canal will be 'integral' to the creation of a unique sense of place. The land uses supported in the policy text should help to support the creation of a sense of place, leading to the prediction of significant positive effects against this objective. As the majority of Old Oak South is likely to come forward for development post-2026, medium to long term effects are predicted.
		P2	++	S, M-T, I, R, M	Old Oak North and OPDC area	The vision for the area highlights that Old Oak North will be redeveloped in the earlier states of the regeneration. The development will be residential-led with a mix of town centre uses. The future population will benefit from a new network of streets, open spaces and associated community infrastructure embedded into new buildings and in accessible locations. Early phases of development will be supported by a range of meanwhile uses and employment space for SMEs that help support place-making, deliver a mixed use place and act as a catalyst for wider regeneration. This could lead to significant benefits against this objective.
		P3	++	S, M, L-T, I, R, L	Old Oak South and Old Oak North	The vision for the area states that the street will be a primary north-south route through Old Oak, connecting Harlesden to Wormwood Scrubs and further south. The high street will be designed to the highest quality, materials and green infrastructure. The variation

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						in levels along the high street will create unique features and spaces that will play a defining role in shaping Old Oak's sense of place. The Vision for the area suggest that the character of the high streets will likely change along its length, with a commercial focus in Old Oak South, providing services for the large number of employees, and providing a mix of uses and spaces in Old Oak North to support the area's future residential population. However, this differs from the description of the three character areas in the policy wording. Positive effects are predicted. *It is suggested that further clarity with regards to green infrastructure is provided strategically, to which the requirement within the policy could refer to. It is also recommended that it is referred to as 'multifunctional green infrastructure' as, although SuDS are referred to in the supporting text, green infrastructure has the potential to provide greater benefits.*
		P4	++	S, M, L-T, I, R, L	Old Oak North, Old Oak South and Park Royal	The vision for the Grand Union Canal states that it will be central to creating a new part of London in Old Oak and enhancing Park Royal as a thriving industrial area. The policy states that the land along the canal will deliver housing and employment uses along its length in Old Oak, and industrial uses and ancillary uses with active frontages at ground floor level in Park Royal. This should help to create a sense of place. *It is recommended that clarity is provided in the supporting text as to the nature of 'new and enhanced green and civic spaces' as required through the policy wording in relation to green infrastructure, and what their functions are intended to be.*
		P5	++	S, M, L-T, I, R, L	Park Royal	The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network. In addition to supporting the delivery of improvements to the walking and cycling network, the policy could lead to an improvement in the sense of place. In addition, design measures and the provision of public open spaces could help to reinforce a sense of local distinctiveness.
		P6	++	M, L-T, I, R, M	Park Royal and OPDC area	As stated in the Local Plan, the area currently lacks a defined character and its environment is dominated by the road network. These streets are framed by inactive building frontages and parking, creating a poor quality public realm. The vision for the area seeks to enhance the range of services, shared services and amenities in the area, to support local business, existing residential and medical communities. The public realm will be improved to benefit from new public open spaces alongside active street frontages. This is reflected in the policy wording and should lead to benefits against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		P7	++	M, L-T, I, R, M	North Acton and OPDC area	The policy seeks to improve the public realm within the area, including supporting the development of active frontages. Alongside the delivery of a new public civic square, residential, employment, community infrastructure and improved connections across the area, the policy could lead to the generation of significant positive benefits against this objective.
		P8	++	M, L-T, I, R, M	Scrubs Lane and OPDC area	The policy seeks to contribute to and/or deliver new and improved walking and cycling routes, access to the Scrubs as well as a high quality coordinated public realm and street greening. Alongside the overall approach to the area, which focusses development around the important historic character of the area, these measures should lead to an improvement in local distinctiveness locally.
		P9	++	S, M, L-T, I, R, M	OPDC area	Currently, the public realm along Old Oak Lane is dominated by vehicular transport providing a poor walking and cycling experience. The vision for the area states that Old Oak West will be a diverse area, reflecting its location between Old Oak and Park Royal, centred on improving busy street environment and the industrial innovation area adjacent to the Grand Union Canal. The HS2 construction sites are included in the industrial areas north and south of the canal. The vision states that these sites will provide a space for industrial innovation within a high quality environment, which integrates with Old Oak and Harlesden. Public realm improvements may provide some benefits, although as a connecting place with large construction sites, effects are unlikely to be significant.
		P10	++	S, M, L-T, I, R, M	OPDC area	Wormwood Scrubs is described in the Local Plan as a 'green lung' that provides people and wildlife with the opportunity to enjoy open space. The policy seeks to supports the area as a public open space, alongside securing resources for its management, which should help to enhance its function locally.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.
		P2	++	S, M-T, I, R, M	Old Oak South and OPDC area	The vision for the area highlights that densities in Old Oak North will include high density development in areas with good public transport access and facilities, with lower density development in sensitive areas such as the canal. This could lead to the efficient use of land in this area.
		P3	++	S, M, L-T, I, R, M	Old Oak South and Old Oak North	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.
		P4	++	S, M, L-T, I,	Old Oak South	The policy specifies the areas where high densities will be encouraged across the area.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M	and Old Oak North	This could lead to benefits against this Objective.
		P5	++	S, M, L-T, I, R, M	Park Royal	The vision for the Park Royal area states that the design of industrial buildings is likely to change, responding to the need for making optimum use of land as values rise and new technologies support structural change. This should lead to the optimisation of land in this location.
		P6	++	M, L-T, I, R, L	Park Royal area	The policy seeks to centralise the provision of services, shared services and amenities to support local businesses, residents and the medical community alongside providing improved accessibility by walking and cycling modes within the area. It also states that proposals will be required to demonstrate how they are optimising the use of land. This would create some benefits against this objective through creating a more efficient use of land.
		P7	++	S, M, L-T, I, R, M	North Acton	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.
		P8	++	S, M, L-T, I, R, M	North Acton	The policy specifies the areas where high densities will be encouraged across the area, seeking to recognise sensitive historic assets as locations where lower densities would be appropriate. This could lead to benefits against this Objective.
		P9	++	S, M, L-T, I, R, M	Old Oak West	The policy seek to intensify the use of sites within the SIL by requiring proposals to demonstrate how they are maximising the use of sites, including the provision of smaller unity, to support greater industrial employment densities. This could lead to benefits against this Objective.
		P10	+	S, M, L-T, I, R, M	Wormwood Scrubs	The continued protection of Wormwood Scrubs is considered to be an efficient use of space appropriate to its relevant designations.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	The policy specifies the areas where high densities will be encouraged across the area. This would lead to benefits against this Objective.
		P2	++	S, M-T, I, R, M	Old Oak South and OPDC area	The vision for the area highlights that densities in Old Oak North will include high density development in areas with good public transport access and facilities, with lower density development in sensitive areas such as the canal. This could lead to the efficient use of land in this area, maximising the re-use of previously developed land.
		P3	++	S, M, L-T, I, R, M	Old Oak South and Old Oak North	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	contaminated land	P4	++	S, M, L-T, I, R, M	Old Oak South and Old Oak North	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.
		P5	++	S, M, L-T, I, R, M	Park Royal	The vision for the Park Royal area states that the design of industrial buildings is likely to change, responding to the need for making optimum use of land as values rise and new technologies support structural change. This should lead to benefits against this objective.
		P6	++	S, M, L-T, I, R, M	Park Royal Centre	The policy is likely to lead to the re-use and improved efficiency in the use of previously developed land, which should generate benefits against this objective.
		P7	++	S, M, L-T, I, R, M	North Acton	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this Objective.
		P8	++	S, M, L-T, I, R, M	North Acton	The policy specifies the areas where high densities will be encouraged across the area, seeking to recognise sensitive historic assets as locations where lower densities would be appropriate. This could lead to benefits against this Objective.
		P9	++	S, M, L-T, I, R, M	Old Oak West	The policy seek to intensify the use of sites within the SIL by requiring proposals to demonstrate how they are maximising the use of sites, including the provision of smaller unity, to support greater industrial employment densities. This could lead to benefits against this Objective.
		P10	0			The policy will not lead to the development of previously developed land.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport	P1	++	M, L-T, D, R, M	OPDC area, London wide and nationally	Supporting text to the policy highlights that walking and cycling access within the area is very constrained, which restricts movements to the north/south and east/west. The vision for Old Oak South includes that the area will be focussed on a new Old Oak Common station and a new London Overground station. In addition, a 'complete new network of streets and bridges will integrate Old Oak South with its surroundings.' The policy wording states that the delivery of a network of unique and connected neighbourhoods will be supported. This could lead to significant benefits against this objective through encouraging the use of non-motorised transport across the area. Further significant benefits may be realised from the supporting of new rail, bus, taxi and cycle infrastructure and ensuring that these integrated with their surroundings, including the provision of direct pedestrian and cycle access to Wormwood Scrubs. A direct vehicle connection over the Grand Union Canal, improving existing streets and supporting better connections to the Kensal Canalside Opportunity Area, could also lead to significant benefits against

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	network					this objective. *It is suggested that the 'delivery' and 'transport' sections of the policy repeat the supporting of transport infrastructure. These two sections could be merged, to avoid repetition. It is also suggested that the 'streets' section (o) repeats the need for the new transport infrastructure to integrate with its surroundings. These two sections could be streamlined to avoid repetition.*
		P2	++	M, L-T, D, R, M	OPDC area, London wide and nationally	Willesden Junction station is situated in the northern part of Old Oak North and provides access to both the Bakerloo London Underground Line and the London Overground. However, at present, access from this station to the core development area is poor. The core development area also doesn't include any east-west links. The policy seeks to facilitate the delivery of a network of unique and connected neighbourhoods, an enhanced Willesden Junction Station and a new Overground Station on the West London line. Contributing to the new Old Oak High Street, providing better connections across the area should improve accessibility significantly.
		P3	++	S, M, L-T, I, R, M	Old Oak South and Old Oak North, OPDC area and surrounding boroughs	The policy seeks to provide legible connections to and from transport interchanges as well as providing a high quality public realm that is attractive to both pedestrians and cyclists. Alongside the provision of services and facilities, this could lead to significant benefits against this objective.
		P4	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The Local Plan outlines that the current character of the Grand Union Canal is characterised by limited passive surveillance, which has a negative impact on the use of the tow path for walking, cycling and recreation. The canal itself is not currently extensively used for transport and is home to a community of residential moorings. The vision sets out that development in this area will provide a safe and convenient walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond. New bridge crossings will support easier north/south movement while the canal itself will be promoted and used for the transport of people and freight. This is reflected in the policy wording, with the addition of the use of the canal for leisure uses. This could lead to significant benefits against this objective.
		P5	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	As stated in the Local Plan, the Park Royal area currently suffers from high levels of road congestion generated by industrial functions and a reliance on private vehicular transport. The vision states that residential pockets and open spaces will be better connected by safe and inviting routes to allow existing and future residents in these areas to access the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						range of new services that will be available in old oak. The policy supports improvements to the frequency, capacity and connectivity of the local bus network. In addition, the delivery of improvements to the walking and cycling network could lead to significant benefits against this objective.
		P6	++	S, M, L-T, I, R, M	Park Royal and OPDC area, and surrounding boroughs	The policy seeks to centralise services and amenities for the local business community, residents and the medical community. The policy also supports improvements to the bus network, highway network and the legibility of streets, including the delivery of cycling and walking infrastructure. This could lead to significant benefits against this objective.
		P7	++	M, L-T, I, R, L	North Acton and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections to Old Oak Common Station, and will ensure that North Action is integrated into the wider regeneration area. The policy also has a significant focus on providing higher density development which is focussed around the North Acton station. Highways improvements and active frontages along streets are proposed, alongside new and/or improved connections across the A40 to West Acton. The policy also proposes new walking and cycling routes and significant employment as well as residential, thereby bringing homes and jobs closer together. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. It is also unclear what type of 'connections' across the A40 are supported by the policy. *It is suggested that the proposed 'connections' across the A40 are explained more clearly in the policy text.*
		P8	++	M, L-T, I, R, L	Scrubs Lane and OPDC area, and surrounding boroughs	The policy recognised the potential for high and medium densities to the north of the canal and west of Scrubs Lane nearer to the proposed Hythe Road Station which should lead to benefits against this objective. Further, the policy seeks to contribute towards and/or deliver new and improved walking and cycling routes as well as vehicular routes and connections. These measures could lead to some benefits against this objective.
		P9	++	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The policy seeks to minimise the impacts of construction traffic on the street network, existing residents and businesses, including through the use of consolidation centres. Developments should improve connections across the area, including vehicle, walking and cycling routes. These measures could lead to benefits against this objective.
		P10	++	S, M, L-T, D, R, M	OPDC area, and surrounding boroughs	The policy seeks to improve access to Wormwood Scrubs to and from Little Wormwood Scrubs, North Kensington, Old Oak Common Estate and other areas to the south and Old Oak. This could help to improve accessibility and help to connect communities within the area.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						The policy wording could specify that promoted access to Wormwood Scrubs would be via walking and cycling modes, as set out in the supporting text to the policy.
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	P1	+	M, L-T, D, R, M	OPDC area	The policy wording specifies that developments that deliver residential development across the whole of Old Oak South will be supported, which could lead to positive effects against this objective.
		P2	+	S, M-T, D, R, M	OPDC area	The vision for the area highlights that Old Oak North will be redeveloped in the earlier states of the regeneration. The development will be residential-led with a mix of town centre uses. Old Oak North will make a 'significant' contribution to the area's housing need.
		P3	+	S, M, L-T, D, R, M	Old Oak South and Old Oak North, OPDC area and surrounding boroughs	The policy states that residential uses will be provided on the upper floors of the high street. Alongside proposed policies for Old Oak South and Old Oak North, this will contribute to the achievement of this objective.
		P4	+	S, M, L-T, D, R, M	Grand Union Canal	The canal itself is not currently extensively used for transport and is home to a community of residential moorings. The vision sets out that new bridge crossings will support easier north/south movement while the canal itself will be promoted and used for the transport of people and freight. The policy states that new development will be supported where it supports the delivery of residential and visitor moorings in appropriate locations that do not adversely impact on the regeneration of the wider area or navigational function of the canal. It also identifies that residential uses with front doors on to the canal edge will be supported. This could lead to both positive and negative effects against this objective, as some existing residential moorings may be lost, where they are not considered to be in conformity with the regeneration proposals of the Local Plan. However, the overall net delivery of housing supply will be higher.
		P5	+	S, M, L-T, D, R, M	Park Royal	The east of the area includes a Gypsy and Traveller site. The justification text directs readers to policy H9 which provides guidance for Gypsy and Traveller Accommodation. The First Central site will include a mix of uses including housing, which could deliver some benefits against this objective. *The policy could provide further information following the completion of the OPDC Gypsy and Traveller Accommodation Needs Assessment in light of emerging legislation.*

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		P6	0			The policy does not specifically propose housing within the area and so no effects are predicted.
		P7	++	S, M, L-T, D, R, L	North Acton, OPDC area and surrounding boroughs	As stated in the Local Plan, the area is currently being regenerated with existing developments of residential and student housing being included within the land uses. The perfume factory sites is also expected to be redeveloped as a residential-led mixed use development. The vision for the area seeks to build upon this, to provide a substantial number of new homes in the area, which could lead to benefits against this objective. However, this is not reflected in the policy wording.
		P8	+	S, M, L-T, D, R, L	Scrubs Lane and OPDC area	The policy seeks to provide housing as part of mixed use developments within the area. This could contribute to positive effects against this objective.
		P9	+	M, L-T, D, R, L	OPDC area	The policy states that housing densities should be mindful of the surrounding context. Residential is supported outside the SIL.
		P10	0			The policy will not lead to the delivery of housing development.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	A significant increase in the density of development could lead to an increase in hardstanding and built development, which could have negative effects in relation to surface water and sewer flooding if not adequately mitigated through flood management and design as suggested in the Environment and Utilities Chapter. The policy specifies that development should seek to overcome current surface water flooding issues to the south of the canal and to the north of Wormwood Scrubs. This could lead to positive effects against this objective. However, how this might be achieved is not specified, although the issues are described as 'significant' in the supporting text, leading to low certainty in the prediction of effects. *See recommendation under Objective 10.*
		P2	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues to the north of the West London Line. This could lead to positive effects against this objective. However, how this might be achieved is not specified, although the issues are described as 'significant' in the supporting text, leading to low certainty in the prediction of effects. *See recommendation under Objective 10.*
		P3	+	S, M, L-T, I, R, M	Old Oak South and Old Oak	The policy seeks to support the delivery of green infrastructure along the length of the high street. This could create benefits against this objective, as the supporting text

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					North, OPDC area and surrounding boroughs	specifies that this could include SuDS. However, specific potential benefits of green infrastructure, nor reference to a wider strategy to maximise the benefits is provided. *See recommendation under Objective 1 with regards to green infrastructure.*
		P4	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects. *Supporting text could include a strategy for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.*
		P5	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects. *Supporting text could include a strategic for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.*
		P6	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects. *Supporting text could include a strategy for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.*
		P7	0			No reference is made within the policy to improving the local environment in order to adapt to the potential effects of climate change. *A scheme of planting, connected to a wider green infrastructure network, which may also include SuDS, could be included as a requirement in the Local Plan.*
		P8	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects. *Supporting text could include a strategic for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.*
		P9	+	S, M, L-T, D,	OPDC area	The policy specifies that development should seek to overcome current surface water

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				IR, L	and surrounding boroughs	flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects. *Supporting text could include a strategic for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.*
		P10	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects. However, it is noted that flooding in the common will not create as much risk to people and property as it would elsewhere within the local plan area. *Supporting text could include a strategy for how surface water flood risk may be overcome that further relates to the Water Policy. This could help deliverability and reduce flood risk.*
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	P1	+/-	M, L-T, D, R, M	OPDC area, London wide and nationally	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P2	+/-	S, M-T, D, R, M	Old Oak North and OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured. *The introductory text indicates that an Old Oak Common Decentralised Energy Strategy is currently in preparation. It is suggested that the findings of this study are reflected in the supporting text, to provide more detail in relation to the supported 'energy centre'. How potential pollution from this facility might be managed could be explained.*
		P3	+/-	S, M, L-T, D, R, M	Old Oak South and Old Oak North	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through a lengthy

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						construction programme if renewable sources of energy supply aren't secured.
		P4	+/-	S, M, L-T, D, R, M	Old Oak South and Old Oak North	Minimising the need to travel and focussing development around new public transport infrastructure, walking and cycling, should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P5	+	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network. In addition, the delivery of improvements to the walking and cycling network, the policy could lead to an improvement local emissions levels. The vision for the Park Royal area states that the design of industrial buildings is likely to change, responding to the need for making optimum use of land as values rise and new technologies support structural change. This could help to improve energy efficiency through improving the performance of buildings. This may balance out a potential increase in demand for energy from new development, although the exact mix of uses and potential energy balance is unknown, leading to uncertainty in the prediction of effects.
		P6	+/-	S, M, L-T, D, R, M	Park Royal and OPDC area	The policy seeks to centralise services and amenities for the local business community, residents and the medical community. The policy also supports improvements to the bus network and the legibility of streets, including the delivery of cycling and walking infrastructure. This could lead to some benefits against this objective. Improvements to the highway network could lead to some positive effects on local emissions, although could also encourage the use of vehicular transport as a mode of travel unless improvements to the public transport network are delivered in accordance with the Transport Chapter.
		P7	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections to Old Oak Common Station, and will ensure that North Acton is integrated into the wider regeneration area. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. Highways improvements and active frontages along streets are proposed, alongside new and/or improved connections across the A40 to West Acton. This could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. It is currently unclear what type of 'connections' across the A40 are supported by the policy. The increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						programme if renewable sources of energy supply aren't secured. *It is suggested that following the development of further work on the A40, additional detail could be provided for the proposed 'connections' across the A40 .*
		P8	+/-	M, L-T, I, R, L	Scrubs Lane and OPDC area, and surrounding boroughs	The policy seeks to focus development around public transport infrastructure, which should lead to benefits against this objective. Further, the policy seeks to contribute towards and/or deliver new and improved walking and cycling routes as well as vehicular routes and connections. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. The increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P9	+/-	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The policy seeks to minimise the impacts of construction traffic on the street network, existing residents and businesses, including through the use of consolidation centres. Developments should improve connections across the area, including vehicle, walking and cycling routes. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. The increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P10	+	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The management of Wormwood Scrubs has the potential to be sensitively enhanced to improve its potential to enable the area to adapt to climate change, although this is not specified within the policy it is referred to in the justification text and in the Water Policy. The promotion of walking and cycling access to the park may reduce current emissions from people accessing the park, leading to some positive benefits against this objective. *The policy or supporting text could state that management and sensitive enhancement measures could be implemented to improve the park's potential to enable the local area to reduce climate change emissions, such as through planting schemes.*
8	To minimise production of waste across all sectors in the plan area,	P1	-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies.
		P2	+/-	S, M-T, D, R, M	OPDC area and	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste				surrounding boroughs	programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies. The Powerday waste site will be protected through this policy, which could reduce the potential impact from the development on the surrounding boroughs, which may otherwise have received the displacement of such as facility. The delivery of an energy centre within the area may comprise an energy from waste facility, which could help to reduce waste being displaced from the OPDC area.
		P3	-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies..
		P4	-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies.
		P5	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies. The Twyford Waste Transfer station will be protected through this policy, which could reduce the potential impact from the development on the surrounding boroughs, which may otherwise have received the displacement of such as facility. Redevelopment of the facility is supported in the local plan, which may help to address local capacity issues.
		P6	-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies..
		P7	-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies..
		P8	-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies..
		P9	-	S, M, L-T, D,	OPDC area	The intensification of new development could significantly increase the pressure on

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M	and surrounding boroughs	natural resources and generation of waste during operation as well as through the construction programme which includes the HS2 sites if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies. *Should further information be provided by HS2 regarding their waste management plans, policies are alternative guidance should reflect this.*
		P10	0			The policy is unlikely to have an effect when considered against this objective.
9	Improve the quality of the water environment	P1	+/-	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to celebrate the unique character of the Grand Union Canal and associated nature reserve as well as providing a network of connected open spaces for residents, employees and visitors. This could provide an opportunity for the positive management of water quality in these areas. However, the new vehicle connection across the Grand Union Canal could lead to some negative effects from pollution run off. *See recommendation under Objective 10.* *The management of water quality in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development.*
		P2	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Lower density development near to sensitive uses such as the Grand Union Canal, may help to reduce the potential impact from development on water quality in this area. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain.
		P3	+	S, M, L-T, I, R, M	Old Oak South and Old Oak North, OPDC area and surrounding boroughs	The policy seeks to support the delivery of green infrastructure along the length of the high street. This could create benefits against this objective, as the supporting text specifies that this could include SuDS. However, none of the other potential benefits of green infrastructure, nor reference to a wider strategy to maximise the benefits is provided. *See recommendation under Objective 1 with regards to green infrastructure.*
		P4	+/-	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy wording seeks to ensure that the use of the Grand Union Canal for passenger and freight transport and leisure uses should take into account and impact on drainage functions. This could have some benefits against this objective. However, an increase in the use of the canal could increase the potential for negative effects on the water quality of this resource.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						It is suggested that water quality issues are also included as a consideration when considering the future use of the canal. See recommendation under Objective 10.
		P5	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Supporting text to the policy states that there are utilities infrastructure issues within the area and the policy seeks to support improvements to this. This could help to improve local water quality through increased capacity. Improvements in the local road infrastructure could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain. *See recommendation under Objective 6.*
		P6	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain. *See recommendation under Objective 6.*
		P7	+	S, M-T, D, IR, M	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants locally. *See recommendation under Objective 6.*
		P8	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain.. Street 'greening' could also create benefits to a certain degree, although it is unclear what exactly these measures might comprise. *See recommendation under Objective 6.*
		P9	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						runoff entering the water environment. However, the extent of predicted benefits is uncertain. *See recommendation under Objective 6.*
		P10	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain. The management of area in general could produce positive effects on water quality through planting schemes and pollution sequestration, although effects are uncertain due to the potential management measures being unknown. *See recommendation under Objective 6.*
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P1	+/-	M, L-T, D, IR, M	OPDC area	The area includes a designated nature reserve to the southern edge of the Grand Union Canal. The policy seeks to celebrate the unique character of the Grand Union Canal and associated nature reserve as well as providing a network of connected open spaces for residents, employees and visitors. This could provide an opportunity for the positive management of biodiversity in these areas. However, the new vehicle connection across the Grand Union Canal could lead to some negative effects. *Improving connections could be tied to the development of an area-wide multi-functional Green Infrastructure Strategy. The Local Plan text states that this is currently being developed. It is suggested that, when this is available, relevant text is added explicitly to the policy wording to improve deliverability.* *The management of biodiversity in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development.*
		P2	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Lower density development near to sensitive uses such as the Grand Union Canal, may help to reduce the potential impact from development on biodiversity in this area. The policy specifies that development should be 'mindful' of existing heritage and ecological spaces such as the Grand Union Canal, St Mary's Cemetery and Kensal Cemetery. This could provide some benefits against this objective, although it is unclear what is meant by 'mindful' in this context. Open spaces to be provided may include enhancements for biodiversity in the 'soft' spaces to be provided.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						The policy should provide further information in the supporting text relating to how development should be 'mindful' of these assets as well as how biodiversity may be enhanced within open spaces.
		P3	+	S, M, L-T, I, R, M	Old Oak South and Old Oak North, OPDC area and surrounding boroughs	The policy seeks to support the delivery of green infrastructure along the length of the high street. This could create benefits against this objective, although reference to the potential biodiversity benefits of green infrastructure, nor reference to a wider strategy to maximise the benefits is provided. *Similarly, potential benefits at public open spaces for biodiversity are not referenced and could be specified, including the potential for these to be integrated into a green infrastructure strategy.* *See recommendation under Objective 1 with regards to green infrastructure.*
		P4	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The vision for the area states that the ecological role of the canal will be enhanced and used to support the delivery of the green infrastructure network. The policy wording seeks to ensure that the use of the Grand Union Canal for passenger and freight transport and leisure uses should take into account and impact on biodiversity. The delivery of towpath lighting should also consider the potential impact on biodiversity, as set out in the policy wording. This could have some benefits against this objective. Supporting text highlights that the canal is designated as a Nature Conservation Area of Metropolitan Importance that will be integral to the OPDC green infrastructure network. *It is recommended that measures to enhance biodiversity are encouraged through the policy wording and set out in the supporting text, including the rationale behind a specific lighting strategy. This should help enable successful implementation. It is suggested that some elements of the policy are re-ordered, so that impacts on the water environment and biodiversity are set out under 'environment' in connection with the green infrastructure network.*
		P5	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy states that the Grand Union Canal and associated nature reserve becomes a focal point for the area. Development proposals should enhance existing biodiversity assets along railway corridors, within the First Central Site, the Grand Union Canal, existing public open spaces and at the junction of Abbey Road and Premier Park Road. This specificity could lead to significant positive effects locally.
		P6	0			The policy also does not make reference to biodiversity and relies on the Green Infrastructure and Biodiversity Policy. It is assumed that biodiversity importance in the area is low, and that the proposed development would not have a positive or negative impact on this baseline.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						It is recommended that measures to improve local biodiversity, such as through the extension of the green infrastructure network into the area, or through street planting/landscaping schemes, could be promoted through the policy to improve both biodiversity.
		P7	0			The policy also does not make reference to biodiversity and relies on the Green Infrastructure and Biodiversity Policy. It is assumed that biodiversity importance in the area is low, and that the proposed development would not have a positive or negative impact on this baseline. *It is recommended that measures to improve local biodiversity, such as through the extension of the green infrastructure network into the area, or through street planting/landscaping schemes, could be promoted through the policy to improve both biodiversity.*
		P8	0			The policy also does not make reference to biodiversity and relies on the Green Infrastructure and Biodiversity Policy. It is assumed that biodiversity importance in the area is low, and that the proposed development would not have a positive or negative impact on this baseline. Street 'greening' could have the potential to improve local biodiversity, although it is unclear what exactly these measures might comprise. *It is recommended that measures to improve local biodiversity, such as through the extension of the green infrastructure network into the area, or through street planting/landscaping schemes, could be promoted through the policy to improve both biodiversity.*
		P9	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy states that development should enhance existing biodiversity assets along the Grand Union Canal. This specifically could lead to positive effects locally.
		P10	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to sustain the existing Local Nature Reserve and sites of borough importance for nature conservation, which could lead to positive effects against this objective. *The policy could seek to 'conserve and enhance' the designations in order to allow Wormwood Scrubs to be utilised for other functions as well as enhance its biodiversity potential.*
11	To minimise air,	P1	+/-	S, M, L-T, D,	OPDC area	Minimising the need to travel and focussing development around new public transport

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	noise and light pollution, particularly for vulnerable groups			R, M		infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance. *See recommendations under Objectives 7 and 10.*
		P2	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance. Supporting text highlights that air quality and noise issues are generated from the Powerday waste facility and from rail uses and that new development will need to clearly demonstrated how design has successfully mitigated these issues. The development of a potential energy from waste facility within the area as identified in the justification text may also increase air pollution locally if not mitigated adequately. *See recommendation under objective 7. The requirement from the supporting text could be referenced in light of policies* EU11 EU12.
		P3	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance. *See recommendations under Objectives 7 and 10.*
		P4	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure, walking and cycling as well as the creation of green infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance.
		P5	+	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network. In addition, the delivery of improvements to the walking and cycling network, the policy could lead to

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						an improvement in air, noise and light pollution locally. However, the protection of industrial uses may mean that pollution levels remain higher in the SIL compared with the surrounding areas. This should be monitored and regulated by the regulatory control system, which is outside the remit of the Local Plan.
		P6	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance. *See recommendation under Objective 10.*
		P7	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance. *See recommendation under Objective 10.*
		P8	+/-	S, M, L-T, D, R, M	OPDC area	The policy seeks to focus development around public transport infrastructure, which should lead to benefits against this objective. Further, the policy seeks to contribute towards and/or deliver new and improved walking and cycling routes as well as vehicular routes and connections. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies D7, EU11 EU12 and London Plan guidance. *See recommendation under Objective 10.*
		P9	+/-	S, M, L-T, D, R, M	OPDC area	The policy seeks to minimise the impacts of construction traffic on the street network, existing residents and businesses, including through the use of consolidation centres. Developments should improve connections across the area, including vehicle, walking and cycling routes. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. In considering the potential impact from the HS2 construction programme, policies D7, EU11, EU12 and London Plan guidance should be implemented to manage impacts. In

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						light of this, mixed effects are considered to be delivered.
		P10	+	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The management of Wormwood Scrubs has the potential to address air and noise pollution, although this is not specified within the policy. The promotion of walking and cycling access to the park may reduce current pollution levels from people accessing the park, leading to some positive benefits against this objective. *See recommendation under objective 7*
12	To conserve and enhance the historic environment, heritage assets and their settings	P1	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Supporting text to the policy highlights that the Grand Union Canal is a designated Conservation Area. The policy specifically states that supported developments will celebrate the unique character of Grand Union Canal, and that it becomes an accessible focal point for the area. This could provide some benefits against this objective. *It is suggested that further detail relating to how development should reflect the historic character and appearance of the Old Oak area is reflected in the policy wording and supporting text. This should include the identification and protection of local views and the settings of historic assets. However, it is noted that the OPDC Heritage and Views Study is yet to be completed.*
		P2	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Under the 'density' subheading, the policy specifies that development should be 'mindful' of existing heritage and ecological spaces such as the Grand Union Canal, St Mary's Cemetery and Kensal Cemetery. This could provide some benefits against this objective, although it is further information should be provided to describe what is meant by 'mindful' in this context. Under 'open spaces' the ecological and historical character of the Gran Union Canal is to be 'celebrated'. *The policy should seek to reduce repetition within the policy with regards to the ecological and historical character of the Grand Union Canal as well as provide further information in the supporting text relating to how development should be managed in relating to enhancing nature conservation and heritage assets.*
		P3	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Supporting text to the policy states that building heights and massing on the high street should vary, respond to local character and context and should not create a wall of massing. Any development proposals will need to be sensitive to its surroundings such as Wormwood Scrubs, the Grand Union Canal, Kensal Cemetery and nearby existing residential areas. This could create some benefits against this objective.

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						It is recommended that this requirement from the supporting text is included in the policy wording to improve implementation.
		P4	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The vision states that behind the canal, a 'string of waterside spaces will complement the canal's historic character' with many providing space for events, relaxation, socialising and the night time economy along busier stretches. However, it is unclear how this will complement the historic character of the canal. The policy wording seeks that development proposals recognise the Grand Union Canal Conservation Area as a sensitive area suitable for the lowest density development and that the canal and its setting should be protected and/or enhanced. This could lead to significant benefits against this objective. *See recommendations for P1 – how the waterside spaces would complement the canal's historic character could be specified. Any repetition between P1, P2 and P4 should be sought to be removed.*
		P5	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy wording specifies that and proposed designated heritage assets and their setting should be protected and/or enhanced as part of development. This could provide some benefits against this objective. Supporting text should set out the heritage assets to be considered as part of this requirement. As stated, this will be included in the next iteration of the local plan.
		P6	+	S, M, L-T, D, IR, M	OPDC area	As stated in the supporting text, Park Royal Centre lacks a defined character. The policy should help to enhance the local built environment, which could lead to some benefits for the historic environment in neighbouring 'places'.
		P7	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	As stated in the supporting text, North Acton suffers from a poor quality public realm. The policy should help to enhance the local built environment, which could lead to some benefits for the historic environment in neighbouring 'places' and surrounding boroughs including Ealing.
		P8	++	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The Cumberland Park Factory site is proposed as a Conservation area. Further, the area north of the canal is bounded by St Mary's cemetery conservation area to the east. The current public realm along Scrubs Land is dominated by vehicular transport and a poor walking and cycling environment. The Local Plan sets out that the Former Cumberland Park Factory provides the opportunity to inform the development of local character within Scrubs Lane and across Old Oak. The vision for the area seeks that Scrubs Lane is transformed into a pleasant street, respectful of heritage assets within a high quality public realm. The street will be framed by the active historic frontages of thriving micro,

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						small and medium sized employment uses within the Cumberland Park Factory alongside a series of new mixed-use developments. Development will be designed to respond to heritage assets and their settings. This is reflected in the policy wording, which should lead to significant benefits against this objective.
		P9	+	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy specifically seeks to protect and/or enhance the Grand Union Canal and Old Oak Land Conservation Areas and their settings. This could lead to benefits against this objective in the long term, although it is unclear how this would be implemented during the construction phases of development.
		P10	0			The policy is unlikely to have an effect when considered against this objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P1	++	M,L-T, I, R, M	Old Oak South and OPDC area	The policy seeks that density considerations are mindful of existing residential communities in the area. Alongside measures to ensure the delivery of a sense of place and improve connectivity across the area, which could improve community interaction, this could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses.
		P2	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to deliver high quality, residential-led development alongside the delivery of town centre uses. The policy also seeks that density considerations are mindful of existing residential communities in the area. This should deliver benefits against this objective, however, the types of town centre uses are not specified. *Supporting text could provide a link to the glossary to define town centre uses.*
		P3	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to deliver a major new town centre of the highest quality design that will contribute to delivering an excellent and accessible public realm. The types of town centre uses are specified as including a significant quantum of A-class uses as well as a range of culture, sports and leisure uses, visitor accommodation and social infrastructure. This could provide significant benefits against this objective through improving accessibility to services and facilities as well as increasing the potential for community interaction.
		P4	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seed to provide a range of green and civic spaces, that could contribute to increasing a sense of community wellbeing locally, leading to positive effects against this objective.
		P5	+	S, M, L-T, I, R, M	Park Royal and surrounding	The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network and reducing

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					areas	severance caused by the A40 and A406. In addition to supporting the delivery of improvements to the walking and cycling network, the policy could lead to some improvement in community cohesion locally.
		P6	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to the potential severance caused by the road network locally. The policy seeks to centralise the provision of services, shared services and amenities to support local businesses, residents and the medical community alongside providing improved accessibility by walking and cycling modes within the area. Alongside measures to improve the built environment within this area, including the creation of more active frontages, which could encourage an increase in walking and cycling, these could create significant benefits against this objective above the existing baseline.
		P7	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy specifically requires that supported development will be of a lower density in more sensitive locations close to residential areas, as well as areas of open space such as Acton Cemetery. Land uses supported will include a mix of small-scale retail, leisure and community uses and eating and drinking establishments to serve local needs. The policy also seeks to improve connections between features within the area such as the station and the town centre uses, which should enable the achievement of significant benefits against this objective.
		P8	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy supports development as part of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, as well as reducing traffic congestion, could increase community interaction, resulting in greater cohesion. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community.
		P9	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy specifically seeks that land uses do no negatively impact on the amenity of existing residential communities, which could lead to some benefits against this objective. However, as the area will be accommodating the HS2 construction site, it is considered that, although long term benefits may be positive, short term impacts on local communities could be negative, as a result of the significant construction impacts locally if not appropriately managed.
		P10	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The management of the facilities as a public open space for exercise and recreation could have significant positive effects against this objective. Increasing accessibility to the area through walking and cycling connections is likely to compound this effect.

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14	Improve safety and reduce crime and the fear of crime	P1	+	M,L-T, I, R, M	Old Oak South and OPDC area	The policy seeks that density considerations are mindful of existing residential communities in the area. Alongside measures to ensure the delivery of a sense of place and improve connectivity across the area, which could improve community interaction, this could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses, which could reduce the potential for anti-social behaviour.
		P2	+	S, M, L-T, D, IR, M	Old Oak South and OPDC area	The Local Plan describes the existing pedestrian environment in the area as 'hostile', with existing routes isolated from surrounding uses and suffering from a lack of natural surveillance. The creation of improved connections may reduce this effect alongside the support for activation of the area within the Spatial Vision. Although specific measures to improve natural surveillance have not been specified in the policy wording, these are managed through London Plan policies.
		P3	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to deliver a major new town centre of the highest quality design that will contribute to delivering an excellent and accessible public realm. The types of town centre uses are specified as including a significant quantum of A-class uses as well as a range of culture, sports and leisure uses, visitor accommodation and social infrastructure. This could provide significant benefits against this objective through increasing the potential for community interaction, active frontages and natural surveillance.
		P4	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The Local Plan outlines that the current character of the Grand Union Canal is characterised by limited passive surveillance, which has a negative impact on the use of the tow path for walking, cycling and recreation. The vision sets out that development in this area will provide a safe and convenient walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond including through the use of active frontages. The policy also specifically sets out the need for tow path lighting, which could reduce the fear of crime along the canal, leading to positive effects.
		P5	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network and reducing severance caused by the A40 and A406. In addition to supporting the delivery of improvements to the walking and cycling network, the policy could lead to some improvement in community cohesion locally which, in turn, could provide benefits for crime and the fear of crim.
		P6	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to increase community interaction. Alongside measures to improve the built environment within this area, including the creation of more active frontages, which could encourage an increase in walking and cycling, further

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						maximising natural surveillance, these measures could create significant benefits against this objective above the existing baseline.
		P7	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy specifically requires that supported development will be of a lower density in more sensitive locations close to residential areas, as well as areas of open space such as Acton Cemetery, as well as improve connections between features within the area such as the station and the town centre uses, which should enable the achievement of benefits against this objective in terms of community cohesion and interaction, leading to a greater sense of wellbeing locally and an increase in natural surveillance. This effect could be compounded through the provision of an increase in active frontages in areas close to North Acton Station and along main streets.
		P8	+	S, M, L-T, i, R, M	OPDC area and surrounding boroughs	The policy supports development as part of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, as well as reducing traffic congestion, could increase community interaction, resulting in greater cohesion. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community. In addition to an increase in the development of active frontages, this could have positive effects for crime and the fear of crime. *Reference to active frontages, as included in the supporting text, should be specified in the policy wording to improve deliverability.*
		P9	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy specifically seeks that land uses do no negatively impact on the amenity of existing residential communities, which could lead to some benefits against this objective. An improvement in connectivity across the area and active frontages could help to improve community coherence and natural surveillance, leading to benefits against this objective. However, as the site will be the impact of the HS2 construction site will need to be mitigated.
		P10	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The management of the facilities as a public open space for exercise and recreation could have some positive effects against this objective. Increasing accessibility to the area through walking and cycling connections could also provide benefits. *The management of the park could include measures to reduce crime and the fear of crime when using or accessing the park, particularly if it would be open during the evenings.*
15	Maximise the	P1	+	S, M,L-T, I, R, M	OPDC area and	The policy seeks that density considerations are mindful of existing residential communities in the area. Alongside measures to ensure the delivery of a sense of place

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	health and wellbeing of the population, reduce inequalities in health and promote healthy living				surrounding boroughs	and improve connectivity across the area, which could improve community interaction, this could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses. Accessibility to health services and physical activity may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. Long term potential air quality benefits may also have benefits for health. Access to green space could also provide both physical and mental health benefits. Some negative effects on health during the construction period may result from noise and air pollution if not adequately managed. *See recommendation under objective 10 – multifunctional green infrastructure could improve the potential health benefits of connective routes through the increase in pollution sequestration, improved micro-climate and a sense of wellbeing.*
		P2	+	S, M, L-T, D, IR, M	Old Oak South and OPDC area	Measures to ensure the delivery of a sense of place and improve connectivity across the area, which could improve community interaction, could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community uses as part of the town centre uses. Accessibility to health services and physical activity may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. Long term potential air quality benefits may also have benefits for health. Access to green space could also provide both physical and mental health benefits. Some negative effects on health during the construction period may result from noise and air pollution if not adequately managed. The Local Plan describes the existing pedestrian environment in the area as 'hostile'. The creation of improved connections may reduce this effect alongside the support for activation of the area within the vision. Although specific measures to improve natural surveillance have not been specified in the policy wording, these are managed through London Plan policies. *See recommendation under Objective 14.*
		P3	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to deliver a major new town centre of the highest quality design that will contribute to delivering an excellent and accessible public realm. The types of town centre uses are specified as including a significant quantum of A-class uses as well as a range of culture, sports and leisure uses, visitor accommodation and social infrastructure. This could provide benefits against this objective through increasing the potential for community interaction. Further benefits may also be realised through the supporting of the creation of social infrastructure as part of the town centre uses. Access to green

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						space could also provide both physical and mental health benefits. Some negative effects on health during the construction period may result from noise and air pollution if not adequately managed. *See recommendation under objective 1 with regards to green infrastructure.*
		P4	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The Local Plan outlines that the current character of the Grand Union Canal is characterised by limited passive surveillance, which has a negative impact on the use of the tow path for walking, cycling and recreation. The vision sets out that development in this area will provide a safe and convenient walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond including through the use of active frontages. This could have benefits for physical and mental health through physical activity, increased community interaction and improved air quality in this area. The policy also specifically sets out the need for tow path lighting, which could reduce the fear of crime along the canal, leading to positive effects for health in this area.
		P5	+	S, M, L-T, D, R, M	Park Royal and surrounding areas	The policy supports improvements to the road network to address congestion, as well as improving the frequency, capacity and connectivity of the local bus network and reducing severance caused by the A40 and A406. In addition to supporting the delivery of improvements to the walking and cycling network, the policy could lead to some improvement in community cohesion locally, which could have benefits for health. A reduction in pollution and increase in connectivity via walking and cycling routes could also lead to positive health effects in this location. However, due to the low proportion of potential residents in this area and the retention of the area as an industrial location, effects are unlikely to be significant.
		P6	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to increase community interaction. Alongside measures to improve the built environment within this area, including the creation of more active frontages, which could encourage an increase in walking and cycling, these measures could create benefits against this objective above the existing baseline. However, due to the low proportion of potential residents in this area and the retention of the area as an industrial location, effects are unlikely to be significant. *Health levels within the area could be improved through the extension of the green infrastructure network through this area, to create more pleasant walking and cycling routes.*
		P7	+	S, M, L-T, I,	North Acton	Land uses supported will include a mix of small-scale retail, leisure and community uses

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				R, M	and surrounding areas	and eating and drinking establishments to serve local needs. The policy also specifically requires that supported development will be of a lower density in more sensitive locations close to residential areas, as well as areas of open space such as Acton Cemetery, as well as improve connections between features within the area such as the station and the town centre uses, which should enable the achievement of benefits against this objective in terms of community cohesion and interaction, as well as physical activity, leading to a greater sense of wellbeing locally and an increase in natural surveillance. Potential improvements in air, noise and light quality could further improve physical health. Walking and cycling is also encouraged.
		P8	+	M, L-T, I, R, M	Scrubs Lane and surrounding areas	The policy supports development as part of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, access to recreational space at Wormwood Scrubs, as well as reducing traffic congestion, could increase community interaction, resulting in greater cohesion as well as physical activity and improved physical health over time, also resulting from potential long term air quality improvements. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community, leading to improvements in mental health. In addition to an increase in the development of active frontages, this could have positive effects for crime and the fear of crime, which could have benefits for health.
		P9	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy specifically seeks that land uses do no negatively impact on the amenity of existing residential communities, which could lead to some benefits against this objective. An improvement in connectivity across the area and active frontages could help to improve community coherence and natural surveillance, leading to benefits against this objective. However, as the area will be accommodating the HS2 construction site, it is considered that, although long term benefits may be positive, short term impacts on local communities could be negative, as a result of the significant construction impacts locally.
		P10	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The management of the facilities as a public open space for exercise and recreation could have significant positive effects against this objective. Increasing accessibility to the area through walking and cycling connections is likely to compound this effect.
16	To improve the education and skills levels of all members of the	P1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. *Town centre uses could be specified to include education facilities where necessary.*

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	population, particularly vulnerable groups					
		P2	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. *Town centre uses could be specified to include education facilities where necessary*
		P3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. The provision of social infrastructure within the high street may include educational facilities, although this isn't specified. *Town centre uses could be specified to include education facilities where necessary*.
		P4	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. *Town centre uses could be specified to include education facilities where necessary*
		P5	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P6	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P7	++	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. The policy specifically supports the delivery of education uses close to North Acton station, which could lead to significant benefits against this objective.
		P8	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.

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		P9	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10	0			The policy is unlikely to have an effect when considered against this objective.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to deliver commercial space, including a range of flexible workspaces in accessible locations, as well as new retail and other town centre uses, including community space. This could lead to positive effects against this Objective. *The provision of training facilities could be specified as a requirement in this area in addition to the guidance set out in policy E5.*
		P2	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to deliver a range of meanwhile uses and employment space for SMEs that help support place-making, deliver a mixed use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective. *The provision of training facilities could be specified as a requirement in this area in addition to the guidance set out in policy E5.*
		P3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to provide a significant quantum of A-class uses as well as a range of culture, sports and leisure uses, visitor accommodation and social infrastructure. This could lead to positive effects against this objective. *The provision of training facilities could be specified as a requirement in this area in addition to the guidance set out in policy E5.*
		P4	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal, which could lead to some positive benefits against this objective arising from the implementation of this policy.
		P5	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of the industrial location of Park Royal, which could lead to some positive benefits against this objective arising from the implementation of this policy.
		P6	+	S, M,L-T, I, R, M	OPDC area and surrounding	The Policy seeks to support the economic functions of the industrial location of Park Royal, which could lead to some positive benefits against this objective arising from the implementation of this policy.

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					boroughs	
		P7	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal as well as the surrounding boroughs including Ealing, which could lead to some positive benefits against this objective arising from the implementation of this policy. *It is unclear from the policy text under b) what exactly the policy is supportive of. This could be made clearer in the policy wording.*
		P8	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal as well as the surrounding boroughs, which could lead to some positive benefits against this objective arising from the implementation of this policy.
		P9	+	S, M, L-T, I, R, M	Old Oak West	The policy seek to intensify the use of sites within the SIL by requiring proposals to demonstrate how they are maximising the use of sites, including the provision of smaller unity, to support greater industrial employment densities. This could lead to benefits against this Objective through maximising local employment levels.
		P10	0			The policy is unlikely to have an effect when considered against this objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P1	++	M, L-T, I, R, L	OPDC area and surrounding boroughs	The Policy seeks to support small and large scale catalyst uses as well as delivering commercial space and new retail and other town centre uses. This could encourage inward investment in the area. It is unclear as to whether the uses proposed would impact on neighbouring town centres. The policy also supports the redevelopment of all existing infrastructure, rail and industrial uses, which could have significant benefits against this objective. *It is recommended that this is a consideration, and measures to reduce the impact on neighbouring town centres be included within the policy or highlighted to ensure that the intention behind measures is made clear.*
		P2	++	M, L-T, I, R, L	OPDC area and surrounding boroughs	The existing land uses are characterised by a large second hand car dealership (Cargiant), rail infrastructure and a large waste recycling and processing plant (Powerday and European Metal Recycling). There are also a substantial number of SMEs in the area. New development will be residential-led with a mix of town centre uses including small and large scale catalyst uses. New employment spaces will cater mainly for SME and micro-businesses as part of new mixed-use buildings. Early phases will be supported by a range of meanwhile uses and employment space for SMEs that help support place-making, deliver a mixed use place and act as a catalyst for wider regeneration. The type of workspaces will differ from the large commercial spaces in Old Oak South. The policy

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						wording encourages flexible workspace typologies at locations adjacent to transport or utilities infrastructure. This should help to provide benefits against this objective. Further benefits in terms of connections to Harlesden town centre, could further compound sustainability benefits.
		P3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to provide a significant quantum of A-class uses as well as a range of culture, sports and leisure uses, visitor accommodation and social infrastructure. This vision specifies that the Old Oak South area of the high street will be focussed on providing services for the large number of employees in the area. This could increase the attractiveness of the location to inward investors. However, this is not reflected in the policy wording. *See recommendation under Objective 1.*
		P4	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy could increase the connectivity of the employment and residential areas across the plan area, as well as improving the local environment. This could be attractive to inward investors, leading to potential benefits against this objective.
		P5	++	M, L-T, I, R, L	London-wide and nationally	The Park Royal industrial estate is protected by a SIL designation. The policy supports this designation and seeks to deliver broad industrial type uses within the SIL. Mixed use development is encouraged on the First Central Site, including non-industrial employment and housing that supports walking, cycling and public transport access to Park Royal London Underground Station. The delivery of a range of walking and cycling infrastructural improvements are also set out in the policy. This clarity of land uses and potential improvement in the local environment and connectivity could improve the attractiveness of the area to inward investors.
		P6	++	M, L-T, I, R, L	London-wide and nationally	The policy supports a range of industrial types alongside affordable open workspaces and supporting services and amenities within a centralised, accessible, area. This should help to generate significant benefits against this objective.
		P7	++	M, L-T, I, R, L	London-wide and nationally	The policy seeks to provide a range of flexible workspaces and a significant quantum of new jobs and SME space, focussed on the station and major thoroughfares. Visitor accommodation will also be provided. This should help to deliver significant benefits against this objective. *See recommendation under Objective 17.*
		P8	++	M, L-T, I, R,	London-wide	The policy seeks to provide a range of flexible workspaces as part of the development of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				L	and nationally	the Cumberland Park Factory and new mixed use developments. This should help to deliver significant benefits against this objective. *See recommendation under Objective 17.*
		P9	++	M, L-T, I, R, L	London-wide and nationally	The policy seeks to deliver development uses of broad industrial types appropriate for a SIL on the HS2 construction sites, once they are no longer in use. The policy also seeks to deliver employment and commercial uses. The policy seeks to intensify the use of sites within the SIL by requiring proposals to demonstrate how they are maximising the use of sites, including the provision of smaller unity, to support greater industrial employment densities. Together, along with public realm improvements, these measures could help to encourage inward investment into the area in the medium to long term.
		P10	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The protection of this green open space could encourage inward investment to some degree, through increasing the attractiveness of the area as a place to live and work.

Table G-3 Chapter 5: Sustainable development

- SD1: Sustainable development

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	SD1	+	L-T, I, R, M	OPDC area and London-wide	Policy SD1 seeks to encourage the implementation of sustainable development through seeking to proactively work with applicants to jointly find solutions to ensure that development will improve the economic, social and environmental conditions in the area in accordance with Local Plan policies, the London Plan and the NPPF. This should help to realise benefits against this objective, although the specific benefits and potential negative effects of the policies have been assessed elsewhere in this IIA and will form the overall assessment of the effects of this policy.
2	To optimise the	SD1	+	L-T, I, R, M	OPDC area and London-	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	efficient use of land through increased development densities and building heights, where appropriate				wide	London Plan and the NPPF.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
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	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	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	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
9	Improve the quality of the water environment	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
10	Create and enhance biodiversity and	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	the diversity of habitats across the area and its surroundings					
11	To minimise air, noise and light pollution, particularly for vulnerable groups	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
12	To conserve and enhance the historic environment, heritage assets and their settings	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
14	Improve safety and reduce crime and the fear of crime	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	SD1	+	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF.
18	To encourage inward investment	SD1	++	L-T, I, R, M	OPDC area and London-wide	See assessment under Objective 1. The policy should lead to positive effects against this objective, through the implementation of the other policies within the Local Plan, the London Plan and the NPPF. A positive approach to working with developers should

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	alongside investment within existing communities, to create sustainable economic growth					encourage an increase in inward investment in the local area.

Table G-4 Chapter 6: Design

- D1: Strategic Policy: For Design
- D2: Streets and public realm
- D3: Open space
- D4: New buildings
- D5: Alterations & extensions
- D6: Heritage
- D7: Amenity
- D8: Inclusive design

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	D1	++	M, L-T, D, R, H	OPDC area	The policy seeks to contribute towards creating new character areas for places and neighbourhoods and enhancing positive elements of existing local character and context through the delivery of exemplar world class architectural and landscape design which would enable the enhancement of local distinctiveness and character and would directly support the IIA Objective.
		D2	++	M, L-T, D, R, H	OPDC area	The policy seeks to deliver exemplarily designed, welcoming, safe, resilient, flexible, inclusive and sustainable public realm network through supporting proposals that contribute to improving the quality of existing public realm and creating new public realm; improving local character areas or contributing to the delivery of new local character areas which would directly support the IIA Objective.
		D3	+	M, L-T, D, R, M	OPDC area	The protection and enhancement of existing public open spaces as well as contribution to the delivery of new public open spaces will support local distinctiveness and help to encourage place-making.
		D4	+	M, L-T, D, R, M	OPDC area	The policy seeks to deliver world class exemplary designed buildings which would contribute towards encouraging place-making.
		D5	+	M, L-T, D, R, M	OPDC area	Alterations and extensions would contribute to the IIA Objective through improving the architectural quality and character of existing building, as well as the provision of open and active frontages to the public realm.
		D5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy would seek the development of a streamlined local planning framework, however, this approach could result in negative impacts on the local character and context through an accumulation of unmanaged amendments to existing buildings.
		D6	+	S, M, L-T, I, R, M	OPDC area	The conservation and enhancement of the historic environment, heritage assets and their setting would contribute towards creating a sense of place.
		D7	+	S, M, L-T, I,	OPDC area	The provision of a high level of amenity and quality environment for building users would

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M		help to support place-making.
		D7 Option 1	+	S, M, L-T, I, R, M	OPDC area	The use of the London Plan policy to manage amenity would partially contribute towards achieving the IIA Objective.
		D8	+	S, M, L-T, I, R, M	OPDC area	The provision of an inclusive designed environment for Old Oak, Park Royal, and Wormwood Scrubs would support place-making.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	D1	+	S, M, L-T, I, R, M	OPDC area	The creation of new character areas and enhancement of positive existing elements would inform optimising of development densities and location and/or range of building heights.
		D2	+	S, M, L-T, I, R, M	OPDC area	The delivery of exemplarily designed, welcoming, safe, resilient, flexible, inclusive and sustainable public realm network will contribute to optimising densities in helping to support the functioning of buildings and quality of life of building users.
		D3	+	S, M, L-T, I, R, M	OPDC area	The delivery of a network of public open spaces will contribute to optimising densities in helping to support the quality of life of building users.
		D4	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver world class exemplary designed buildings and supports the delivery of densities within development that support those identified in the Overarching Spatial Policies and Places chapter of the Plan.
		D5	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		D6	+	S, M, L-T, I, R, M	OPDC area	The need to conserve and / or enhance heritage assets will contribute to inform development densities and building heights.
		D7	+	S, M, L-T, I, R, M	OPDC area	Ensuring that development delivers a high level of amenity and high quality environment for building users will inform development densities and buildings.
		D7 Option 1	+	S, M, L-T, I, R, M	OPDC area	Using London Plan policy to ensuring that development delivers a high level of amenity and high quality environment for building users will inform development densities and buildings may not deliver the sufficient amount of amenity specific to Old Oak and Park Royal.
		D8	0	N/A	N/A	There is no clear link between the Policy and IIA Objective.
3	Maximise the reuse of previously developed land	D1	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral. This is considered in the OSPs.
		D2	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	and existing buildings, including the remediation of contaminated land					neutral. This is considered in the OSPs.
		D3	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral. This is considered in the OSPs.
		D4	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver world class exemplary designed buildings and supports the delivery of densities within development that support those identified in the Overarching Spatial Policies and Places chapter of the Plan.
		D5	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
		D5 Option 1	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
		D6	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
		D7	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
		D7 Option 1	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
		D8	0	N/A	N/A	Development within the OPDC area would be on previously developed land however this is not the specific focus of the policy therefore effects against the Objective would be neutral.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised	D1	+	S, M, L-T, I, R, M	OPDC area	The delivery of exemplar design quality would involve good levels of accessibility which would support the IIA Objective.
		D2	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to contribute to or improve the network of streets and to contribute to connecting places together as well as breaking down severance which would support the improvement of accessibility and may contribute towards minimising the need to travel.
		D3	+	S, M, L-T, I, R, L	OPDC area	The provision of public open space would make partial contributions towards improving accessibility.
		D4	+	S, M, L-T, I,	OPDC area	The policy would include the delivery of development densities that accord with guidance

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	transportation methods and mitigate impacts on the transport network			R, L		set out in the OSP Chapter, thereby higher densities at stations would contribute to minimising the need to travel.
		D5	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		D6	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		D7 Option 1	0	N/A	N/A	There is no clear link between the policy and the IIA Objective.
		D8	+	S, M, L-T, D, I, R, M	Old Oak, Park Royal, and Wormwood Scrubs	The policy specifically seeks to deliver inclusive and accessible designed environment for Old Oak, Park Royal, and Wormwood Scrubs and to reduce existing barriers.
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	D1	++	S, M, L-T, I, R, L	OPDC area	The policy seeks to create new and enhance existing character areas for places and neighbourhoods. Across Old Oak and within non-industrial areas of Park Royal, this would include significant levels of housing.
		D2	0	N/A	N/A	The policy seeks the delivery of public realm and therefore has no direct link to the IIA Objective.
		D3	0	N/A	N/A	The policy addresses the delivery of open space and therefore has no direct link to the IIA Objective.
		D4	+	S, M, L-T, I, R, L	OPDC area	The policy addresses the delivery of new buildings and development densities in accordance with the OSP Chapter which would deliver significant levels of new housing, thereby supporting the IIA Objective.
		D5	0	N/A	N/A	The policy addresses alterations and extensions however ultimately does not directly relate to housing provision.
		D5 Option 1	0	N/A	N/A	The policy addresses alterations and extensions however ultimately does not directly relate to housing provision.
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	The policy primarily addresses amenity provision and has no direct link between the IIA Objective.
		D7 Option 1	0	N/A	N/A	The policy primarily addresses amenity provision and has no direct link between the IIA Objective.
		D8	+	S, M, L-T, D, I, R, M	Old Oak, Park Royal, and	The policy seeks inclusive design and it is noted that policy 3.8 of the London Plan requires development to deliver 10% of new housing to be designed to be wheelchair

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					Wormwood Scrubs	accessible or easily adaptable for residents who are wheelchair users.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	D1	+	S, M, L-T, D, I, R, L	OPDC area	New development has the potential to increase flood risk however this would only be associated with development within flood zones associated with the River Brent. However the provision of exemplar design would incorporate flood avoidance or adaptation measures. This should also be considered alongside the Environment and Utilities Chapter water proposed policy which sets out the suggested approach to flood risk. *Where necessary, appropriate mitigation measures should be incorporated into development.*
		D2	+	S, M, L-T, D, I, R, L	OPDC area	The nature of the policy itself to deliver an exemplarily designed, welcoming, safe, resilient, flexible, inclusive and sustainable public realm network may offer benefits towards the IIA Objectives through measures such as street greening There is no clear link between the policy and the IIA Objective.
		D3	+	S, M, L-T, D, I, R, L	OPDC area	The provision of open space has the potential to act as flood storage which could prevent adverse risk to housing areas and delivering green infrastructure to help address the urban heat island effect. *Where necessary and appropriate, flood risk mitigation measures and measures supporting climate change adaptation should be incorporated into the design of open space in accordance with the proposed water policy in the Environment and Utilities Chapter..*
		D4	0	N/A	N/A	New exemplarily designed and sustainable buildings would potentially incorporate flood alleviance or flood avoidance measures. This should also be considered alongside the Environment and Utilities Chapter water proposed policy which sets out the suggested approach to flood risk.
		D5	?	S, M, L-T, D, I, R L	OPDC area	The extent of extensions could potentially have an effect on flood risk, however, this would only be associated with development within flood zones associated with the River Brent. *Where necessary and appropriate, flood risk mitigation measures and measures supporting climate change adaptation should be incorporated into the design of open space in accordance with the proposed water policy in the Environment and Utilities Chapter.*
		D5 Option 1	?	S, M, L-T, D, I,R, L	OPDC area	The policy states that guidance is not provided for alterations, extensions or shopfronts and could potentially have an effect on flood risk however this would only be associated with development within flood zones associated with the River Brent. *Where necessary and appropriate, flood risk mitigation measures and measures*

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						supporting climate change adaptation should be incorporated into the design of open space in accordance with the proposed water policy in the Environment and Utilities Chapter.
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
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	D1	0	N/A	N/A	The nature of the policy itself to demonstrate exemplar world class architectural and landscape design quality and may offer benefits towards the IIA Objectives through measures such as energy efficiency and reducing reliance on natural resources though not to a significant degree.
		D2	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D3	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D4	+	S, M, L-T, D, I, R, M	OPDC area	The policy seeks the development of world class exemplarily designed and sustainable buildings which would likely support the minimisation of contributions to climate change through high standards of sustainable design and the incorporation of incorporated measures for energy efficiency.
		D5	+	S, M, L-T, D, I, R, M	OPDC area	Alterations and extensions would require the use of materials and transportation during construction though appropriate measures could support climate change adaptation. *Development should seek to incorporate sustainability measures during construction and operation.*
		D5 Option 1	+/-	S, M, L-T, D, I, R, M	OPDC area	The policy does not provide guidance for alterations, extensions and shopfronts instead seeking the development through a streamlined planning framework approach. Lack of guidance could reduce the likelihood of meeting the IIA Objective *Development should seek to incorporate sustainability measures during construction and operation.*
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
8	To minimise	D1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D2	+	S, M, L-T, D,	Old Oak and	The policy seeks to coordinate the delivery of utilities infrastructure within the public realm

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	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			I, R, M	Park Royal	which could include sub-surface waste transfer. This would help to support the IIA Objective.
		D3	0	N/A	N/A	The provision of open space is not likely to result in significant effects to waste.
		D4	+/-	S, M, L-T, D, I, R, M	OPDC area	Development of new buildings could have negative effects resulting in increased waste particularly during construction if not adequately mitigated through policies in the waste management policy in the Environment and Utilities Chapter. *Where appropriate waste and recycling facilities should be incorporated and waste minimisation techniques should be encouraged.*
		D5	+/-	S, M, L-T D, I, R, M	OPDC area	Alterations and extensions could have negative effects resulting in increased waste particularly during construction if not adequately mitigated through policies in the waste management policy in the Environment and Utilities Chapter.. *Where appropriate waste and recycling facilities should be incorporated and waste minimisation techniques should be encouraged.*
		D5 Option 1	+/-	S, M, L-T, D, I, R, M	OPDC area	Alterations and extensions through a streamlined planning framework approach could have negative effects resulting in increased waste particularly during construction if not adequately mitigated through policies in the waste management policy in the Environment and Utilities Chapter.. *Where appropriate waste and recycling facilities should be incorporated and waste minimisation techniques should be encouraged.*
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
9	Improve the quality of the water environment	D1	+	S, M, L-T, D, I, R, M	OPDC area	The delivery of exemplar world class landscape design quality could include water efficiency measures such as SuDS which would contribute to improving the water environment.
		D2	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D3	+	S, M, L-T, D, I, R, M	OPDC area	New and existing open space could support the IIA Objective through providing opportunities for Sustainable Urban Drainage Systems (SuDS). *Sustainable water measures should be adopted where appropriate.*
		D4	+	S, M, L-T, D, I, R, M	OPDC area	The policy seeks to deliver exemplary design and sustainable buildings which could include water efficiency measures such as SuDS which would contribute to improving the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						water environment. *Sustainable water measures should be adopted where appropriate.*
		D5	+	S, M, L-T,D, I, R, M	OPDC area	The delivery of alterations and extensions could include water efficiency measures such as SuDS which would contribute to improving the water environment. *Sustainable water measures should be adopted where appropriate.*
		D5 Option 1	+/-	S, M, L-T, D, I, R, M	OPDC area	The delivery of alterations, extensions and shopfronts could include water efficiency measures such as SuDS. However a lack of guidance for delivery could have implications for achieving the IIA Objective. *Sustainable water measures should be adopted where appropriate.*
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	D1	+	S, M, L-T, D, I, R, M	OPDC area	The delivery of world class architectural and landscape quality design could contribute towards including landscape features which may support the IIA Objective though to a limited degree.
		D2	+	S, M, L-T, D, I, R, M	OPDC area	The delivery of a sustainable public realm network could help to support biodiversity where spaces may include provision for street greening. *Where possible, green corridors should be encouraged within development.*
		D3	+	S, M, L-T, D, I, R, M	OPDC area	The delivery of open space could help to support biodiversity where spaces may include provision for green corridors. *Where possible, green corridors should be encouraged within development.*
		D4	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
11	To minimise air,	D1	+	S, M, L-T, D, I, R, M	OPDC area	The delivery of exemplar world class architectural and landscape design quality could include measures to minimise air, noise and light pollution.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	noise and light pollution, particularly for vulnerable groups					
		D2	+	S, M, L-T, D, I, R, L	OPDC area	The provision of open space could bring about positive effects to air quality through the provision of street greening.
		D3	+	S, M, L-T, D, I, R, L	OPDC area	The provision of open space could bring about positive effects to air quality through the provision of vegetation.
		D4	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D6	N/A	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	+	S, M, L-T, D, I, R, L	OPDC area	The need for development to deliver a high level of amenity would directly minimise air, noise and light pollution.
		D7 Option 1	+/-	S, M, L-T, D, I, R, L	OPDC area	The need for development to deliver a high level of amenity would directly minimise air, noise and light pollution. Relying on London Plan policy may not address Old Oak and Park Royal specific issues in relation to daylight/sunlight.
		D8	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	D1	+	S, M, L-T, I, R, M	OPDC area	The creation of new places within the plan area would support the IIA Objective as design would seek to enhance existing elements of local character and context ensuring a positive response to the surrounding environment. This would help to ensure that the setting of assets would be protected and enhanced as well helping to conserve the historic environment.
		D2	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver a public realm network that responds to the surrounding character. This would support the IIA Objective through the provision of public realm that respects and complements its existing surroundings including heritage assets and their setting.
		D3	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver open space that contributes to the character and activation of an area. This would support the IIA Objective through the provision of open space that respects and complements its existing surroundings including heritage assets and their setting.
		D4	+	S, M, L-T, I, R, M	OPDC area	The delivery of exemplary buildings would support the IIA Objective through careful design that respects its surroundings and conserves the historic environment, heritage assets and their setting.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D5	+	S, M, L-T, I, R, M	OPDC area	The policy states that proposals for alterations and extensions would be supported where they relate sympathetically to any other sensitive sites that would be affected which would contribute to conserving heritage assets and their setting as well as protecting the historic environment.
		D5 Option 1	+/-	S, M, L-T, I, R, L	OPDC area	The policy also supports the IIA Objective however without guidance provided for alterations, extensions and shopfronts, unmanaged amendments to existing buildings could result in negative impacts on local character and potentially heritage assets.
		D6	++	S, M, L-T, D, R, H	OPDC area	The policy would directly support the IIA Objective as it seeks to identify, conserve, enhance and improve access to the historic environment, heritage assets and their setting. The policy also seeks to ensure heritage assets contribute to improving and creating a sense of place where appropriate and address Heritage at Risk.
		D7	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to provide high level amenity and quality environment for building users and surrounding areas which would enable an approach to development that would be sensitive to the existing local area and would respect and complement features including heritage assets and their setting.
		D7 Option 1	-	S, M, L-T, I, R, M	OPDC area	A London-wide standardised approach to the delivery of amenity would help to contribute to delivering the objective, however OPDC would not be able to manage specific amenity issues in relation to higher density development.
		D8	0	N/A	N/A	The policy seeks to deliver exemplary inclusive and accessible design that could support sensitive development however would not make significant contributions towards achieving the IIA Objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	D1	+	S, M, L-T, I, R, L	OPDC area	The provision of new character areas and improvements to existing character areas would support a sense of place and would help to increase community cohesion.
		D2	+	S, M, L-T, I, R, L	OPDC area	The policy seeks provision of public realm that facilitates the use and enjoyment of spaces and to improve the network of streets, to connect places together and breakdown severance all of which would contribute towards increasing community cohesion and reducing social exclusion.
		D3	+	S, M, L-T, I, R, L	OPDC area	The provision of open space, the protection of existing spaces and the delivery of temporary spaces that contribute to the vitality character and activation of an area supporting the development of permanent development would help to increase community cohesion and encourage a sense of community welfare.
		D4	+	S, M, L-T, I, R, L	OPDC area	The delivery of new buildings would contribute to creating a sense of place and would partially support the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D5	N/A	N/A	N/A	Alterations and extensions would not contribute significantly towards the achievement of the IIA Objective.
		D5 Option 1	N/A	N/A	N/A	Alterations and extensions would not contribute significantly towards the achievement of the IIA Objective.
		D6	+	S, M, L-T, I, R, L	OPDC area	The improvement and enhancement of the historic environment and heritage features within the area may contribute partially towards supporting community cohesion.
		D7	+	S, M, L-T, I, R, L	OPDC area	The provision of a high level of amenity and quality environment would help to support community cohesion and welfare.
		D7 Option 1	+	S, M, L-T, I, R, L	OPDC area	A London-wide standardised approach to the delivery of amenity would help to contribute to delivering the objective, however OPDC would not be able to manage specific amenity issues in relation to higher density development
		D8	+	S, M, L-T, I, R, L	Old Oak, Park Royal, and Wormwood Scrubs	The development of inclusive design that is safe and accessible and addresses existing barriers would contribute towards community cohesion.
14	Improve safety and reduce crime and the fear of crime	D1	++	S, M, L-T, I, R, L	OPDC area	The policy primarily focuses on place-making through the provision of architectural and landscape design quality which incorporates safety and could make contributions towards reducing fear of crime.
		D2	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to provide safe public realm and improving the network of streets which would help to improve safety. *Development design should seek to optimise natural surveillance and ensure that new spaces and routes are safe.*
		D3	+	S, M, L-T, I, R, L	OPDC area	The design of open space could support the reduction of crime and could improve safety.
		D4	+	S, M, L-T, I, R, L	OPDC area	The delivery of world-class exemplary and sustainable building design would likely incorporate safety into its design which would support the IIA Objective however this is not explicitly stated within the policy.
		D5	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	+	S, M, L-T, I, R, L	OPDC area	The design of open space could support the reduction of crime and could improve safety.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D7 Option 1	+	S, M, L-T, I, R, L	OPDC area	A London-wide standardised approach to the delivery of amenity would help to contribute to delivering the objective, however OPDC would not be able to manage specific amenity issues in relation to higher density development
		D8	+	S, M, L-T, I, R, L	Old Oak, Park Royal, and Wormwood Scrubs	Safety could be improved through development design.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	D1	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to enhance existing local character and context and contribute towards creating new character areas for places and neighbourhoods for locations within Old Oak this would contribute to place-making and maximising the wellbeing of the population.
		D2	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to provide welcoming and safe public realm network that facilitates the use and enjoyment of spaces while responding to local character and integrating with surroundings. This would contribute towards maximising the wellbeing of the population through enabling safety, enhancing community spirit all of which would support community cohesion. It would also contribute to promoting healthy living giving greater opportunities for walking and cycling which would promote health benefits.
		D3	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to protect and enhance existing public open spaces, create and connect new public open spaces to meet needs identified and deliver private and communal open space to support the needs of residents which would contribute to maximising health and wellbeing as well as helping to promote healthy living.
		D4	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver world class exemplarily designed and sustainable new buildings that would contribute to maximising the wellbeing of the population.
		D5	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D6	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D7	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high level of amenity and quality environment for building users that would not negatively impact upon the amenity of existing local communities would contribute towards maximising the health and wellbeing of the population.
		D7 Option 1	+	S, M, L-T, I, R, M	OPDC area	A London-wide standardised approach to the delivery of amenity would help to maximise health and wellbeing of the population however OPDC would not be able to manage specific amenity issues in relation to higher density development.
		D8	+	S, M, L-T, I, R, L	Old Oak, Park Royal, and	The delivery of inclusive design which is accessible and addresses existing barriers of the physical environment would make contributions towards maximising wellbeing of the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					Wormwood Scrubs	population.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	D1	0	N/A	N/A	The policy primarily addresses place-making and has no direct link to improving education and skills.
		D2	0	N/A	N/A	The policy primarily addresses streets and public realm and has no direct link to improving education and skills.
		D3	0	N/A	N/A	The policy primarily addresses open space and has no direct link to improving education and skills.
		D4	+	M, L-T, I, R, L	OPDC area	The policy primarily addresses new building design, including social infrastructure which could include the integration of schools which would support the improvement of education.
		D5	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
		D5 Option 1	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
		D6	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
		D7	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
		D7 Option 1	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
		D8	0	N/A	N/A	There is no direct link between the policy and improving education and skills.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	D1	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to provide new character areas and enhance the positive elements of existing character areas which would partially support the IIA Objective in helping to maximise social and economic wellbeing of the local and regional population.
		D2	+	S, M, L-T, I, R, L	OPDC area	Social and economic wellbeing could be partly supported through improvements to public realm and street network.
		D3	+	S, M, L-T, I, R, L	OPDC area	The provision of public open space would partly support the IIA Objective by contributing to maximising social wellbeing.
		D4	+	S, M, L-T, I, R, L	OPDC area	The delivery of exemplary designed buildings could help to support social and economic wellbeing.
		D5	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D5 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D6	+	S, M, L-T, I, R, M	OPDC area	The conservation, enhancement and improvement of the historic environment and heritage assets help to generate social and economic benefits for Old Oak and Park Royal and would therefore partially support the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D7	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high level amenity and quality environment for building users and surrounding areas would help to support social and economic wellbeing.
		D7 Option 1	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D8	0	N/A	N/A	Social and economic wellbeing could be partly supported by delivering an exemplarily inclusive and accessible designed environment for all.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	D1	+	S, M, L-T, I, R, L	OPDC area	An increase in exemplar design that contributes to enhancing character and creating new character areas would contribute towards encouraging inward investment alongside investment within existing communities.
		D2	+	S, M, L-T, I, R, L	OPDC area	Inward investment would be encouraged through the delivery of public realm that facilitates the use and enjoyment of spaces.
		D3	0	N/A	N/A	Whilst the provision of open space would not significantly contribute towards achieving the IIA Objective, it would help to increase attractiveness of the local area.
		D4	+	S, M, L-T, I, R, M	OPDC area	The delivery of exemplary and sustainable buildings would enable the creation of attractive areas which would help to encourage inward investment alongside investment within existing communities.
		D5	+	S, M, L-T, I, R, L	OPDC area	Alterations and extensions would provide for improvements to the architectural quality and character of buildings which would make partial contributions towards achieving the IIA Objective.
		D5 Option 1	+	S, M, L-T, I, R, L	OPDC area	Alterations and extensions would provide for improvements to the architectural quality and character of buildings which would make partial contributions towards achieving the IIA Objective.
		D6	+	S, M, L-T, I, R, L	OPDC area	Conserving and enhancing the historic environment and heritage assets would make partial contributions towards achieving the IIA Objective.
		D7	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high level amenity and quality environment for building users and surrounding areas would help to promote the attractiveness of the local area as a place to live and work which would help to attract inward investment and would support the creation of economic growth.
		D7 Option 1	+	S, M, L-T, I, R, L	OPDC area	The management of amenity through a London wide plan similarly with the preferred option would help to promote the attractiveness of the local area as a place to live and work which would help to attract inward investment however the policy would not enable the management of specific amenity issues relevant to Old Oak and Park Royal and therefore would support the IIA Objective to a lesser extent than the preferred option.
		D8	+	S, M, L-T, I,	Old Oak, Park	The delivery of an inclusive and accessible design environment within Old Oak, Park

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M	Royal, and Wormwood Scrubs	Royal and Wormwood Scrub would increase attractiveness within these areas and would help to encourage inward investment.

Table G-5 Chapter 7: Housing Policies and Policy Options

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

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	H1	++	L-T, I, R, M	OPDC area and London-wide	The policy seeks to deliver housing to contribute to meeting the housing needs identified in the London Plan. The requirement for high quality design and lifetime neighbourhoods should lead to significant benefits against this objective.
		H2	+	L-T, I, R, L	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use, which could improve sense of place locally.
		H2 Option 1	+/-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. *It is suggested that bullet point 3 of the policy is unnecessary and provides repetition that could be excluded.*
		H3 Option 1	+	L-T, I, R, L	OPDC area	The policy option relates to alternatives in the provision of housing types, which is unlikely to significantly affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+	M, L-T, I, R, L	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use, as well as resist the loss of existing housing stock, with the exception of land within the SIL, which could improve sense of place locally.
		H5 Option 1	-	M, L-T, I, R, L	OPDC area	The policy option relates to the conversion of buildings to other uses and the potential loss of existing housing stock, which could have a negative effect in relation to the creation of a sense of place adhering to the principles of lifetime neighbourhoods.
		H5 Option 2	+	M, L-T, I, R, L	OPDC area	The policy option would include a lower percentage of family sized accommodation, which could reduce the potential for the creation of mixed communities locally. However, effects would still be positive overall.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments are of a high standard of design, which is managed, should seek to benefit this objective to some degree.
		H6 Option 1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	In addition to the above, the policy option could have benefits for the creation of more sustainable communities through leading to positive impacts for the residents. However, the requirements for all PRS proposals to sign up to the London Rental Scheme could have impacts on deliverability, which could affect the overall housing mix, which could lead to negative effects against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could lead to some benefits against this objective. Supporting text indicates that where quality concerns exist about existing shared housing, their loss to an alternative housing uses will not be resisted or proposals to improve standards will be considered.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						The policy could seek to enhance the creation of local communities as opposed to only seeking that shared housing do not give rise to unacceptable impacts on local amenity. *The policy could include a requirement relating to existing shared housing, similar to that included within the supporting text, within the policy wording.*
		H7 Option 1	-	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing would remove this type of housing from supply and would not help meet London's housing demand.
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments are of a high standard of design, and are accessible to public transport, shops, services, community facilities and social networks, should seek to benefit this objective to some degree.
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. The policy seeks to ensure that the development of student accommodation does not lead to an over-concentration of student accommodation in a particular location. In addition, proposals should not have an unacceptable impact on the immediate and surrounding areas, including residential amenity. Sites should be in accessible locations and not lead to the net loss of other forms of housing. These measures should ensure that a sense of place and community is maintained, although will not necessarily contribute towards the creation of communities. *Measures that could be included to create places within the local communities as a result of student housing could be suggested to enhance their presence within the built environment.*
		H10 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
2	To optimise	H1	+	S, M, L-T, D, R, M	OPDC area and London-	The policy seeks to deliver a significant number of houses within London, which is likely to lead to the optimisation in the use of land.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	the efficient use of land through increased development densities and building heights, where appropriate				wide	
		H2	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H2 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table 5-2 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table 5-2 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table 5-2 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table 5-2 'Affordable Housing Approaches'
		H5	+	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings.
		H5 Option 1	+	M, L-T, I, R, M	OPDC area	The policy option could have some benefits against this objective in that it seeks to optimise development through the conversion of existing dwellings for other uses.
		H5 Option 2	+	M, L-T, I, R, M	OPDC area	The policy option could have some benefits against this objective in that it seeks to optimise development through the conversion of existing dwellings for other uses.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	Meeting an identified need for shared housing within the plan area is considered to be an efficient use of land.
		H7 Option 1	-	S, M, L-T, I, R, L	OPDC area and London-wide	The option seeks to encourage the loss of shared housing which is not a way to optimise the efficient use of land
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The key issues to within the Local Plan in relation to this policy highlight that new specialist need housing should be provided in new high density buildings. However, this is not reflected in the policy wording. *The policy wording could usefully identify the need for developments to be high density, if this is appropriate.*
		H9	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	Gypsy and traveller sites are likely to be characterised by low density development, which could lead to negative effects against this objective. However, there is only site in the OPDC area. Any future site identified would need to meet the required number of pitches, which would be in line with the regulations/guidance. .
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	Student accommodation could be considered to be an efficient use of land as it is likely to be high density.
		H10 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
3	Maximise the reuse of previously developed land and existing buildings, including the	H1	+	S, M, L-T, D, R, M	OPDC area and London-wide	The policy seeks to deliver a significant number of houses within London, which is likely to maximise the use of previously developed land and buildings, through the implementation of this strategic policy.
		H2	+	L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use.
		H2 Option 1	+	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H3	0			The policy is unlikely to have an effect against achievements against this objective

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	remediation of contaminated land					directly.
		H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use.
		H5 Option 1	+	M, L-T, I, R, M	OPDC area	The policy option could have some benefits against this objective in that it seeks to optimise development through the conversion of existing dwellings for other uses.
		H5 Option 2	+	M, L-T, I, R, M	OPDC area	The policy option could have some benefits against this objective in that it seeks to optimise development through the conversion of existing dwellings for other uses.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	Meeting an identified need for shared housing within the plan area is considered to be an efficient use of land.
		H7 Option	-	S, M, L-T, I, R, L	OPDC area and London-	The option seeks to encourage the loss of shared housing which is not a way to optimise the efficient use of land.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		1			wide	
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	-	S, M, L-T, I, R, L	OPDC area and London-wide	Gypsy and traveller sites are likely to be characterised by low density development, which could lead to negative effects against this objective. .
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	Student accommodation could be considered to be an efficient use of land as it is likely to be high density.
		H10 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	H1	+	M, L-T, I, R, M	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of walkable communities and '*sustaining a diverse range of methods of transportation that enable people to get around, especially by using public transport, or by other means if they cannot use this type of service*'[9] The implementation of this policy should lead to benefits against this objective locally.
		H2	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H2 Option 1	+/-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Nevertheless, construction traffic impacts, unless not mitigated, will be managed and policies relating to this are contained in the transport chapter.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.

[9] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	+	M, L-T, I, R, M	OPDC area	The policy seeks that new shared houses should be located in areas with high public transport access and facilities and services. This could help to create benefits against this objective.
		H7 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing would remove this type of housing from supply and would not help meet London's housing demand. Despite the change in nature of accommodation type this should not have an effect on public transport accessibility therefore the option could lead to some benefits.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H8	+	M, L-T, I, R, M	OPDC area	The policy seeks that new specialist housing should be located in areas with high public transport access and facilities and services. This could help to create benefits against this objective.
		H9	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective.
		H10 Option 1	+	M, L-T, I, R, M	OPDC area	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
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	H1	++	L-T, D, R, L	OPDC area and London-wide	The delivery of a significant number of high quality dwellings, to meet London's housing needs, should lead to significant positive benefits against this objective. The policy specifically requires a mix of housing types to meet a wide variety of needs, whilst specifying that 90% of units must be accessible and adaptable and 10% of units must be accessible to wheelchair users. *Details pertaining to what the housing needs will be within the area, in order to identify whether these needs are being 'met' within the housing policies, could be provided in the supporting text. This may be implemented in the next stage of the Local Plan, once the evidence-base studies are complete.* *It is unclear where the 10% of housing to meet building regulation M4(3) 'wheelchair user dwellings' has come from. Reference to the evidence-base for this proportion could be usefully provided in the supporting text. If this is a standard requirement within the building regulations, it is suggested that it need not be included within the policy wording.*
		H2	++	L-T, D, R, M	OPDC area and London-wide	The policy should help the delivery of housing within the area, through the creation of targets, promotion of development opportunities and conversion of existing buildings, as well as through monitoring. The supporting text highlights that the conversion of larger dwellings to smaller, more affordable dwellings, will contribute to the supply of housing. This could create significant benefits against this objective.
		H2 Option 1	+/-	M, L-T, D, R, M	OPDC area and London-wide	Delivering a higher proportion of housing units within the plan period could lead to housing needs being met at an earlier stage. However, potential impacts on viability could lead to negative effects in deliverability, leading to the prediction of both positive

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						and negative effects against this objective.
		H3	++	L-T, I, R, L	OPDC area	The policy could lead to the generation of significant benefits against this objective, in that if will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. *It is suggested that bullet point 3 of the policy is unnecessary and provides repetition that could be excluded.*
		H3 Option 1	+	L-T, D, R, L	OPDC area and London-wide	The policy option would have similar effects to that assessed for the preferred option, although effects may be less significant as, although the option could deliver a more flexible range of unit types, these would not be designed to meet lifetime needs, and thus may not meet all of the housing needs in the area.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+	M, L-T, I, R, L	OPDC area	The policy could generate positive effects against this objective through the creation of additional housing through the conversion of existing dwellings and other types of buildings. However, the policy seeks to provide at least one family sized unit within conversions. This should help to maintain a mix of housing, however, it is unclear whether or not this proportion would meet local needs or not. As stated in the supporting text for policy H3, housing mix and needs will be identified more clearly in the next iteration of the local plan. *See recommendation under Objective 1. It is further recommended that repetition with regards to housing mix is removed between housing policies H3 and H5. The policy*

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						could seek to require that conversions of existing and vacant buildings include provision for ensuring that the accessibility of buildings is brought up to the standard required for new developments.
		H5 Option 1	+/-	M, L-T, I, R, L	OPDC area	The policy option would allow the conversion of existing residential uses for non-residential uses, which could lead to the loss of housing stock. This could lead to negative effects against this objective. However, existing stock may be of unsatisfactory standards; in inappropriate locations or of lower density. The loss of such accommodation will only be negative if it is not replaced, and in instances where it is replaced at higher density, it will have a positive impact.
		H5 Option 2	+/-	M, L-T, I, R, L	OPDC area	The policy option may lead to negative effects against the provision of a mix of housing to meet local needs through the loss of family accommodation. However, the loss of smaller family homes could be to provide a single large family home.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified housing need in London.
		H6 Option 1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	In addition to the above, the requirements for all PRS proposals to sign up to the London Rental Scheme could have impacts on deliverability, which could affect the overall housing mix, which could lead to negative effects against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. Supporting text indicates that where quality concerns exist about existing shared houses, their loss to an alternative housing uses will not be resisted or proposals to improve standards will be considered. This could help to increase quality locally over time. *See second recommendation under Objective 1.*
		H7 Option 1	-	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing would remove this type of housing from supply and would not help meet London's housing demand. The option could result in particular households being unable to this form of affordable housing.
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified housing need in London. Affordable housing is also sought within the policy, for developments that include market led development aimed at older or vulnerable people.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified housing need in London. The extent of how significant the potential benefits will be will be dependent on the outcomes of the study, which will be included in the next stage of the Local Plan. This may include the need to identify new sites for the accommodation of gypsies and travellers.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified housing need in London. Specific requirements with regard to design are not included within the policy.
		H10 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is likely to have similar effects against the objective compared with the preferred option, although these effects may be slightly less positive, as the option does not allow for the flexible future use of the student accommodation.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	H1	+	M, L-T, I, R, L	OPDC area	The policy specifically refers to the need for developments to be flexible and adaptable to accommodate 'future need, innovation and smart technologies'. The supporting text doesn't specify what these measures may include, but goes on to state that development 'will need to cater for a wide variety of needs promoting consideration of aspects such as natural lighting, ventilation and the efficient use of space'. This could lead to indirect benefits against this objective in terms of sustainable design.
		H2	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H2 Option 1	-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Note that the Environment and Utilities policies contain some measures to mitigate this.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 2				
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H5 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H5 Option 2	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	0			The policy is unlikely to have an effect against achievements against this objective directly. Should new sites be proposed, the policy should seek that flood risk minimisation measures are incorporated into the site.
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10 Option	0			The policy is unlikely to have an effect against achievements against this objective directly.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		1				
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	H1	+	M, L-T, I, R, L	OPDC area	The policy specifically refers to the need for developments to be flexible and adaptable to accommodate 'future need, innovation and smart technologies'. The supporting text doesn't specify what these measures may include, but goes on to state that development 'will need to cater for a wide variety of needs promoting consideration of aspects such as natural lighting, ventilation and the efficient use of space'. This could lead to indirect benefits against this objective in terms of sustainable design.
		H2	+/-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for energy and transport. However, design objectives could minimise this effect. However, the delivery phasing and design of schemes will mitigate for the impact on climate change as will the use of sustainable construction methods.
		H2 Option 1	-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. However, be aware that the policies in the transport chapter will require mitigation of construction impact.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		4				
		H5	+/-	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the embodied energy required compared with the creation of new dwellings to meet the entire housing need. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements. However, the policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact on parking or other local amenities. *The policy could seek to require that conversions of existing and vacant buildings include provision for ensuring that the energy efficiency of buildings is brought up to the standard required for new developments.*
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new shared houses are located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on the emissions of greenhouse gases.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new specialist housing is located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on the emissions of greenhouse gases.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						It is recommended that high quality design aspects also specify the need for energy efficient design, which should help to reduce the cost of living for older people and improve their health.
		H9	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective.
		H10 Option 1	+	M, L-T, I, R, M	OPDC area	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
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	H1	+/-	L-T, I, R, L	OPDC area	The delivery of a significant number of houses within the area is likely to have negative implications for the creation of waste. This may be partly mitigated by the policies encouraging recycling.
		H2	+/-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources and the creation of waste. However, design objectives could minimise this effect.
		H2 Option 1	+/-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Note that other policies in the construction sections of the plan could help to mitigate this.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		2				
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+/-	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the waste generated during construction activities. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements. The policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact local amenities. *The policy could add a requirement that conversions do not result in cumulative stress on the local environment, including pollution levels such as air, noise and light pollution as well as the potential impact on biodiversity, land quality and water quality.*
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						directly.
		H9	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
9	Improve the quality of the water environment	H1	+/-	L-T, I, R, L	OPDC area	The delivery of a significant number of houses within the area is likely to have negative implications for the natural environment through a potential increase in polluted runoff and increase demand for natural resources. However, design objectives could minimise this effect – see water management policies.
		H2	+/-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect – see water management policies.
		H2 Option 1	-	M, L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 ‘Affordable Housing Approaches’
		H4 Option 2				See assessment of strategic options Table F-1 ‘Affordable Housing Approaches’
		H4 Option				See assessment of strategic options Table F-1 ‘Affordable Housing Approaches’

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		3				
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+/-	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the pollution generated during construction activities. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements and potential pollution. The policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact local amenities. *See recommendation under Objective 8.*
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be capable of connecting to utilities infrastructure and services. This could help to create benefits against this objective. Access to utilities at the current site in Ealing is unknown.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						The policy could include a requirement for the improvement of connections to services and facilities including utilities to the existing site, should this be necessary. Detail relating to this could be included in the supporting text.
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	H1	-	L-T, I, R, L	OPDC area	The delivery of a significant number of houses within the area is likely to have negative implications for the natural environment through a potential increase in polluted runoff and increase demand for natural resources. However, design objectives could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H2 Option 1	-	M, L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Note that the GI policies in the Environment and Utilities chapter may help to mitigate this.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		3				
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
11	To minimise air, noise and light pollution,	H1	+/-	M, L-T, I, R, M	OPDC area	The delivery of a significant number of houses within the area is likely to have negative implications for the natural environment through a potential increase in polluted runoff and increase demand for natural resources. However, design objectives could minimise this effect. The policy specifically seeks the delivery of 'Lifetime

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	particularly for vulnerable groups					Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of walkable communities and '*sustaining a diverse range of methods of transportation that enable people to get around, especially by using public transport, or by other means if they cannot use this type of service*'[10] The implementation of this policy should lead to benefits against this objective locally. In addition, some indirect effects through high quality design measures, may also lead to some benefits.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in noise and pollution. However, design objectives could minimise this effect including via policies in other chapters.
		H2 Option 1	-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

[10] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H5	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new shared houses are located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on local pollution levels.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new specialist housing is located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on local pollution levels.
		H9	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective through a potential reduction in an increase in vehicular transport. Further, the requirement for consideration of the potential impact on the immediate and surrounding area and residential amenity, could help to reduce potential impacts from noise, air and light pollution.
		H10	+	M, L-T, I, R,	OPDC area	The policy option is unlikely to noticeably affect the predicted effect of this policy

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 1		M		compared to the preferred option.
12	To conserve and enhance the historic environment, heritage assets and their settings	H1	+/-	L-T, I, R, L	OPDC area	The delivery of a significant number of houses within the area is likely to have negative implications for the historic environment through a significant change in the setting of the local area. However, the design and heritage policies could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative implications for the historic environment through a significant change in the setting of the local area. However, the design and heritage policies could minimise this effect.
		H2 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H3	+	M, L-T, I, IR, L	OPDC area and surrounding boroughs	The policy could lead to benefits against this objective, in that new housing will need to take into consideration the local character of the site and its ability to accommodate a mix of housing types and sizes.
		H3 Option 1	+	M, L-T, I, IR, L	OPDC area and surrounding boroughs	The policy option is likely to generate similar effects to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+	M, L-T, I, IR, L	OPDC area and surrounding	The policy seeks to ensure that conversions of existing buildings maintain the general character of the surrounding area. This could help to ensure that effects on the historic environment are minimised.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	+	M, L-T, I, IR, L	OPDC area and surrounding boroughs	The policy is unlikely to have an effect against achievements against this objective directly. Supporting text indicates that new development should take into account the location and character of the area. However, this is not reflected in the policy wording.
		H9	?			Proposals for new gypsy and traveller sites could impact on the local historic environment. However, whether there is a need for new sites is currently unknown until the outcomes of the study are published. *This could be included in the policy wording as a consideration.*
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
13	Increase community cohesion and reduce social	H1	++	M, L-T, I, R, M	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of a number of features, which could have significant positive effects in relation to this objective. These measures includes requirements relating to: resident empowerment; access; the provision of a range of services and amenities; accessible greenspace; opportunities to enhance social

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	exclusion to encourage a sense of community and welfare					networks and wellbeing; and the meeting of inclusive design principles. Specific requirements relating to social networks include: *'Informal/formal opportunities and activities (social, learning/training, volunteering), where people feel safe and confident and which respect and reflect the needs of different ages, cultures and ethnicities.'* [11] Adherence to these principles should ensure that the provision of opportunities reflects the diversity of the local area and the incoming population.
		H2	+	M, L-T, I, R, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.
		H2 Option 1	-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective.
		H3	++	L-T, I, R, L	OPDC area	The policy could lead to the generation of benefits against this objective, in that if will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generated significant benefits against this objective, through the potential creation of greater social equity through reducing geographical inequalities.
		H3 Option 1	+	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of housing types, which, although could offer a more flexible range of unit types compared with the preferred policy option, is unlikely to meet local needs as significantly.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

[11] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		3				
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+	M, L-T, I, IR, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, the general character of the surrounding area, and do not result in the cumulative stress on services. *The policy could be reworded to seek that the conversion of existing dwellings and vacant buildings seeks to enhance the amenity of the local community, as opposed to seeking a minimal effect.*
		H5 Option 1	-	M, L-T, I, R, L	OPDC area	The policy option would allow the conversion of existing residential uses for non-residential uses, which could lead to the loss of housing stock. This could lead to negative effects against this objective.
		H5 Option 2	-	M, L-T, I, R, L	OPDC area	The policy option may lead to negative effects against the provision of a mix of housing to meet local needs through the loss of family accommodation. This could also lead to negative effects against this objective through a reduction in the mix of the community and resulting potential negative effects to the generation of inequalities.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London, which could help to reduce inequalities and provide benefits against this objective to some degree. A requirement to ensure that developments are of a high standard of design, which is managed, should also seek to benefit this objective to some degree.
		H6 Option 1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	In addition to the above, the policy option could have benefits for the creation of more sustainable communities through leading to positive impacts for the residents. However, the requirements for all PRS proposals to sign up to the London Rental Scheme could have impacts on deliverability, which could affect the overall housing mix, which could lead to negative effects against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity. *See first recommendation under Objective 1.*
		H7 Option 1	-	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing would remove this type of housing from supply and would not help meet London's housing demand. The shortage of available affordable housing and more non-affordable self-contained accommodation may alienate certain groups and create unrest in the community.
		H8	++	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Significant positive effects may be achieved through a requirement that accessible social networks are appropriate to the needs of the intended occupiers.
		H9	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy seeks to ensure that any new sites are accessible to services and facilities, and local social infrastructure. This could provide some benefits against this objective. *The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts.*
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. The policy seeks to ensure that the development of student accommodation does not lead to an over-concentration of student accommodation in a particular location. In addition, proposals should not have an unacceptable impact on the immediate and surrounding areas, including residential amenity. Sites should be in accessible locations and not lead to the net loss of other forms of housing. These measures should ensure that a sense of place and community is maintained, although will not necessarily contribute towards the creation of more cohesive communities. *See recommendations under objective 1.*
		H10 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
14	Improve safety and reduce crime and the fear of crime	H1	+	M, L-T, I, R, M	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of a number of features. These measures includes requirements relating to: resident empowerment; access; the provision of a range of services and amenities; accessible greenspace; opportunities to enhance social networks and wellbeing; and the meeting of inclusive design principles. These measures could lead to an increase in natural surveillance and general feeling of community, which could create positive indirect benefits against this objective.
		H2	+	M, L-T, I, R, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.
		H2 Option 1	+	L-T, I, R, L	OPDC area	'Secure by design' policies implemented for housing development will mitigate for the fear of crime and improve safety.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that if will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate benefits against this objective, through the potential creation of greater social equity through reducing geographical inequalities.
		H3 Option 1	+	M, L-T, I, R, L	OPDC area	The policy option relates to alternatives in the provision of housing types, which, although could offer a more flexible range of unit types compared with the preferred policy option, is unlikely to meet local needs as significantly, which may lead to less benefits in relation to social equity.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		4				
		H5	+	M, L-T, I, IR, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, which could have some benefits. *See recommendation under objective 13.*
		H5 Option 1	+	M, L-T, I, IR, L	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+	M, L-T, I, IR, L	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London, which could help to reduce inequalities and provide benefits against this objective to some degree.
		H6 Option 1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	In addition to the above, the policy option could have benefits for the creation of more sustainable communities through leading to positive impacts for the residents. However, the requirements for all PRS proposals to sign up to the London Rental Scheme could have impacts on deliverability, which could affect the overall housing mix, which could lead to negative effects against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards and are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity, which should help to reduce potential impacts on crime.
		H7 Option 1	-	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing to non-affordable accommodation may increase the possibility of crime.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H9	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy seeks to ensure that any new sites are accessible to services and facilities, and local social infrastructure. This could provide some benefits against this objective through potentially reducing the potential for anti-social behaviour. *The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts. This could help to reduce a possible perception of fear of crime.*
		H10	+/-	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The introduction of student housing into the area could increase the potential for local crime, as students can be targets for crime, as well as causing potential anti-social behaviour. Ensuring a mix of housing in student areas could lead to the minimisation of this potentially negative effect – see supporting policy text.
		H10 Option 1	+/-	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	H1	++	M, L-T, I, R, M	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of a number of features, which could have significant positive effects in relation to this objective. These measures includes requirements relating to: resident empowerment; access; the provision of a range of services and amenities; accessible greenspace; opportunities to enhance social networks and wellbeing; and the meeting of inclusive design principles. In addition, the supporting text to the policy indicates that the policy requirement for 'developments to be flexible and adaptable to accommodate future need, innovation and smart technologies' refers to the need for developments to be reflective of the health impacts of new housing. The supporting text refers to aspects such as natural lighting, ventilation and the efficient use of space to be considered specifically, whilst encouraging developers to consider positively the impact on mental and physical health through the quality of housing provision. *The policy wording could specifically refer to the need for developments to be designed with the health and wellbeing of residents in mind. Design measures might also include measures such as high levels of thermal insulation and the provision of outside space/green roofs for all residents.*
		H2	+	M, L-T, I, R, L	OPDC area	The policy could lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						community wellbeing and thus improvements in mental health, as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.
		H2 Option 1	-	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Note construction policy in transport chapter for mitigation measures. And environment chapter policies relation to air quality.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that if will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate benefits against this objective, through the potential creation of greater social equity through reducing geographical inequalities, leading to potential benefits for mental health as well as physical heath, through the provision of appropriate housing types. It is noted that more details relating to housing mix will be provided at the next stage of the Local Plan's development, which could lead to more significant effects being generated against this objective. *It is recommended that the next iteration of the Local Plan considers human health as part of the mix of housing provision, through the consideration of design principles alluded to in the supporting text provided for policy H1. It is suggested that the requirements relating to housing mix within policies H1 and H3 are consolidated into the same policy.*
		H3 Option 1	+	M, L-T, I, R, L	OPDC area	The policy option relates to alternatives in the provision of housing types, which, although could offer a more flexible range of unit types compared with the preferred policy option, is unlikely to meet local needs as significantly, which may lead to less benefits in relation to social equity.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		2				
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	+	M, L-T, I, R, L	OPDC area	The policy could lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing and thus improvements in mental health, as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, and do not result in the cumulative stress on services. This could help to maintain existing health levels. *See recommendation under objective 13. The requirements for new development in terms of requirements for improving mental and physical health should also be applied to the conversion of existing and vacant dwellings, to seek that inequalities are not exacerbated.*
		H5 Option 1	+	M, L-T, I, R, L	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+	M, L-T, I, R, L	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London, which could help to reduce inequalities and provide benefits against this objective to some degree.
		H6 Option 1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	In addition to the above, the policy option could have benefits for the creation of more sustainable communities through leading to positive impacts for the residents. However, the requirements for all PRS proposals to sign up to the London Rental Scheme could have impacts on deliverability, which could affect the overall housing mix, which could lead to some negative effects against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					wide	relevant quality standards are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity, which could have some benefits against this objective. *See first recommendation under Objective 1.*
		H7 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	This option could have a negative effect on the objective. The conversion or loss of shared housing would remove this type of housing from supply and would not help meet London's housing demand. Despite the change in nature of accommodation type this should not have an effect on social infrastructure or public transport accessibility therefore the option could lead to some benefits.
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments are of a high standard of design, and are accessible to public transport, shops, services, community facilities and social networks, should seek to also benefit this objective to some degree through a potential increase in walking to services and facilities, as well as reduction in air pollution, which could provide health benefits. *See recommendation under Objective 7.*
		H9	+/-	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy could lead to the generation of health benefits for potential communities on new sites, as the policy requires that new sites are supported by appropriate facilities, layout and design quality to support health and wellbeing. However, the continued use of the existing site could lead to long term health implications, as access improvements to health facilities are described as limited in the supporting text.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support sites which are in accessible locations to public transport. However, the policy also seeks to ensure the new student housing does not have an unacceptable impact on residential amenity, which doesn't necessarily ensure the health and wellbeing of the student communities. *It is recommended that the policy ensures that new student accommodation is supported by an appropriate level of services and facilities, to meet the needs of the students. This could also help to reduce impacts on residential amenity in a positive way. The creation of new facilities and services might include sports facilities, which*

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						could be shared locally.
		H10 Option 1	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy option is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	H1	+	M, L-T, I, R, L	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles of Lifetime Neighbourhoods include the creation of a number of features. These measures includes requirements relating to: resident empowerment; access; the provision of a range of services and amenities; accessible greenspace; opportunities to enhance social networks and wellbeing; and the meeting of inclusive design principles. Specific requirements include: *'Informal/formal opportunities and activities (social, learning/training, volunteering)'* [12] These measures may lead to some benefits against this objectives in relation to learning opportunities.
		H2	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H2 Option 1	+	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. However, the social infrastructure policies may help mitigate this.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy option relates to alternatives in the provision of housing types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

[12] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H5 Option 1	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H5 Option 2	+/-	M, L-T, I, R, M	OPDC area	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	+	M, L-T, I, R, L	OPDC area	The policy requires that new gypsy and traveller site should be capable of support by local social infrastructure. This could include education facilities, leading to potential benefits against this objective.
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
17	Maximise the	H1	+	M, L-T, I, R,	OPDC area	The policy specifically seeks the delivery of 'Lifetime Neighbourhoods'. The principles

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	social and economic wellbeing of the local and regional population and improve access to employment and training			L		of Lifetime Neighbourhoods include the creation of a number of features. These measures includes requirements relating to: resident empowerment; access; the provision of a range of services and amenities; accessible greenspace; opportunities to enhance social networks and wellbeing; and the meeting of inclusive design principles. Specific requirements include: *'Informal/formal opportunities and activities (social, learning/training, volunteering)'* [13] These measures may lead to some benefits against this objectives in relation to learning opportunities.
		H2	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H2 Option 1	+	L-T, I, R, L	OPDC area	The policy option relates to housing numbers, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option. However, the implication of a higher provision of housing within the plan period could have implications for infrastructure provision and increased construction impacts, which could lead to negative effects against this objective. Also, a larger number of homes could increase the number of opportunities to employment and training.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option				See assessment of strategic options Table F-1 'Affordable Housing Approaches'

[13] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		4				
		H5	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H5 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H5 Option 2	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
18	To encourage inward investment alongside investment within existing	H1	+	L-T, I, R, L	OPDC area, London-wide and nationally	The creation of high quality design and the meeting of housing needs may encourage inward investment into the area indirectly through the attraction of a diverse workforce through the creation of an area where people want to live.
		H2	+	L-T, I, R, L	OPDC area, London-wide and	The policy could increase the potential deliverability of housing in the area, which could increase the attractiveness of the area to inward investors.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	communities, to create sustainable economic growth				nationally	
		H2 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H3	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H3 Option 1	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H4				No preferred policy is provided for affordable housing in this iteration of the Local Plan.
		H4 Option 1				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 2				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 3				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H4 Option 4				See assessment of strategic options Table F-1 'Affordable Housing Approaches'
		H5	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H5 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H5 Option 2	0			The policy option is unlikely to have an effect against achievements against this objective directly.
		H6	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H6 Option 1	0			The policy option is unlikely to have an effect against achievements against this objective directly.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H7	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H7 Option 1	0			The option is unlikely to have an effect against this objective.
		H8	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H9	0			The policy is unlikely to have an effect against achievements against this objective directly.
		H10	+	M, L-T, I, R, L	OPDC area, London-wide	An increase in students in the area may attract local investment through the potential for a highly skilled and potentially flexible workforce.
		H10 Option 1	+	M, L-T, I, R, L	OPDC area, London-wide	The policy option relates to alternatives in the provision of development types, which is unlikely to noticeably affect the predicted effect of this policy compared to the preferred option.

Table G-6 Chapter 8: Employment Policies and Policy Options

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

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	E1	+	S, M, L-T, I, R, M	Old Oak and Park Royal	The policy seeks to promote Old Oak and Park Royal as a place for enterprise and innovation. The area possesses a diverse economic profile and the delivery of economic growth through contribution to the delivery of a range of employment uses in areas outside Strategic Industrial Locations (SIL) and a range of industrial uses within Park Royal SIL would help to enhance the built environment and encourage place making.
		E2	+	S, M, L-T, I, R, M	Old Oak	The policy states that Old Oak would become a mixed employment hub through requiring a range of flexible workspace typologies from proposals and town centre uses which generate employment along the High Street, in and around Old Oak Common Station and in other accessible locations. Supporting Old Oak to become a mixed employment hub would help towards enhancing the built environment and encouraging placemaking.
		E2 Option 1	+	S, M, L-T, I, R, L	Old Oak	The policy would not support focus on B1(a) uses around Old Oak Common Station which would provide for a flexible approach to office distribution across Old Oak. This would not greatly affect place-making compared to the preferred option.
		E2 Option 2	+/-	S, M, L-T, I, R, M	Old Oak	The benefit of not focussing support on B1(b) and B1(c) uses in Old Oak north would be that additional floorspace for non-industrial uses would be provided which would benefit the built environment. However locations not suited to retail, office, leisure or residential uses could remain vacant and could negatively impact upon the amenity of the public realm which could also negatively impact upon placemaking.
		E3	+	S, M, L-T, I, R, M	Park Royal	The protection and enhancement of SIL and the support of adjacent uses and provision for smaller units to support greater employment densities would make contributions towards enhancing the built environment.
		E3 Option 1	+	S, M, L-T, I, R, M	Park Royal	The option states that the SIL boundary would not be extended which would benefit the delivery of non-industrial uses however not designating SIL appropriate sites could be considered a lost opportunity to help support the continued success of Park Royal. The policy would support the enhancement of the built environment though to a lesser extent than the preferred option.
		E3 Option 2	+/-	S, M, L-T, I, R, M	Park Royal	The option states that additional land would be released to accommodate other forms of development which could help to support the enhancement of the built environment. However, there would be increased pressure on industrial land capacity.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		E4	+	S, M, L-T, I, R, M	OPDC area	The policy supports placemaking and the enhancement of the built environment as it seeks to support proposals for affordable workspaces and open workspaces that protect existing viable open workspace typologies and contribute to the wider regeneration of the OPDC area.
		E4 Option 1	+/-	S, M, L-T, I, R, M	OPDC area	Delivery of onsite open workspaces for residential and or/ commercial proposals would provide a large range of employment workspace to support a diverse local economy which in turn would also contribute towards placemaking. However, providing these spaces without appropriate market assessment may result in them remaining vacant.
		E4 Option 2	+/-	S, M, L-T, I, R, M	OPDC area	Delivery of small scale workspaces would contribute towards placemaking and the built environment though on a slightly different scale compared to policies E4 and E4 Option 1. There is a risk that if the employment or housing unit is vacant, then the joined unit would also be vacant.
		E5	+	S, M, L-T, I, R, L	OPDC area	The policy primarily focuses on improving access to employment and training and it seeks to provide physical access to jobs for local people which would help the area become more defined and would contribute to placemaking.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	E1	+	S, M, L-T, I, R, L	Old Oak and Park Royal	Policy supports the establishment of new commercial hub and the consolidation and intensification of Park Royal SIL, both of which aim to make the most efficient use the use of land.
		E2	+	S, M, L-T, I, R, L	Old Oak	The policy seeks to provide a new commercial area and town centre uses.
		E2 Option 1	0	N/A	Old Oak	There is no direct link with the policy and SA Objective.
		E2 Option 2	0	N/A	Old Oak	There is no direct link with the policy and SA Objective.
		E3	+	S, M, L-T, I, R, L	Park Royal	The policy requires proposals to demonstrate how they are maximising the use of sites in Park Royal. This would support the objective.
		E3 Option 1	0	N/A	Park Royal	There is no direct link with the policy and SA Objective.
		E3 Option 2	0	N/A	Park Royal	There is no direct link with the policy and SA Objective.
		E4	+	S, M, L-T, I, R, L	OPDC area	The policy focus is on the support of open workspace typologies and it seeks to support proposals that make maximum use of their site and are appropriately located and designed. This would support the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		E4 Option 1	0	N/A	N/A	There is no direct link with the policy and SA Objective.
		E4 Option 2	0	N/A	N/A	There is no direct link with the policy and SA Objective.
		E5	0	N/A	N/A	There is no direct link with the policy and SA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	E1	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E2	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E2 Option 1	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E2 Option 2	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E3	+	S, M, L-T, I, R, L	OPDC area	Part d requires proposals to demonstrate how they are maximising the use of the site. This would support the objective.
		E3 Option 1	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E3 Option 2	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E4	+	S, M, L-T, I, R, L	OPDC area	The policy focus is on the support of open workspace typologies and it seeks to support proposals that make maximum use of their site and are appropriately located and designed. This would support the objective.
		E4 Option 1	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E4 Option 2	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
		E5	0	N/A	N/A	Development would be on previously developed land however this is not the focus of the policy therefore effects against the SA Objective would be neutral.
4	Minimise the need to travel,	E1	+	M, L-T, I, R, L	Old Oak and Park Royal	The delivery of a range of employment uses in areas outside of the SIL and the delivery of a range of industrial uses within Park Royal's SIL would improve accessibility to jobs and encourage transport links into the area.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	E2	+	M, L-T, I, R, L	Old Oak	The policy states that Old Oak will become a mixed employment hub and would require proposals to provide town centre uses generating employment along the High Street, in and around Old Oak Common Station and in other accessible locations. This would contribute towards achieving the SA Objective through helping to improve accessibility to employment.
		E2 Option 1	+	M, L-T, I, R, L	Old Oak	The policy would not provide support for focussing B1(a) uses in and around Old Oak Common Station and would contribute towards improving accessibility though to a lesser extent than the preferred policy.
		E2 Option 2	+	M, L-T, I, R, L	Old Oak	The policy would not provide support for B1(b) and B1(c) uses in Old Oak north and would contribute towards improving accessibility though to a lesser extent than the preferred policy.
		E3	+	M, L-T, I, R, L	Park Royal	The focus of the policy is the enhancement of SIL and it designates five new SIL sites and in the long term this would improve accessibility to jobs and encourage transport links into the area.
		E3 Option 1	0	N/A	N/A	The policy does not directly link with the SA Objective.
		E3 Option 2	0	N/A	N/A	The policy does not directly link with the SA Objective.
		E4	+	S, M, L-T, I, R, L	OPDC area	Appropriate location of open workspace may make partial contributions to improving accessibility though to a limited extent.
		E4 Option 1	+	M, L-T, I, R, L	OPDC area	The delivery of onsite open workspace for residential and/or commercial proposals may bring employment opportunities closer to residential areas and would make partial contributions towards minimising the need to travel.
		E4 Option 2	+	M, L-T, I, R, M	OPDC area	The delivery of small scale workspaces supported with coordinated delivery of rented small scale residential units outside of the SIL would in the long term enable improve accessibility. The delivery of workspaces that link with residential units would also help to support the mitigation of impacts on the transport network with linked sites promoting more sustainable travel.
		E5	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to maximise access to employment and skills for local people and which would indirectly support improved accessibility.
5	Improve access to well designed, well-located,	E1	0	N/A	N/A	The focus of the policy is to deliver employment and industrial uses which will support economic growth and therefore has no link with the SA Objective.
		E2	0	N/A	N/A	The policy seeks to enhance SIL and therefore has no link with the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	*E2 Option 1*	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E2 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4 Option 2	+/-	M, L-T, D, R, M	OPDC area	The policy would partly support the SA Objective as it seeks to deliver small scale workspace with coordinated delivery of rented small residential units outside the SIL. The policy would enable the delivery of a range of housing typologies which could help to meet local needs. However, the disadvantage would be the risk that if one of the employment or housing units is vacant, the related joined unit would also be vacant.
		E5	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	E1	0	N/A	N/A	The policy focuses on establishing Old Oak as a recognised employment hub, consolidating SILs at Park Royal and supporting the delivery of economic growth. These aims do not link with the SA Objective. It is also noted that there are no flood zones in Old Oak.
		E2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E2 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E2 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		E3	+	M, L-T, I, R, L	Park Royal	The policy focuses on enhancing SIL through demonstrating the use and design of sites and will support the integrity and effectiveness of industrial sites. Flood zones in the OPDC area and risk of flooding is associated with the river Brent. Elements of site design, where located in a flood zones could also include adaptation measures which could minimise flood risk. *Appropriate climate change mitigation and adaptation measures should be incorporated where possible - as per Preferred Policy Option EU3:Water*
		E3 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E3 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E4	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E4 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E4 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E5	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
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	E1	+/-	M, L-T, I, R, M	Old Oak and Park Royal	The consolidation of SIL at Park Royal and support of economic growth has the potential to impact upon climate change through increased industrial activity in the long term contribute to effects upon natural resources and fossil fuels use linked to industrial activities if not managed through London Plan Policy and guidance within the Environment and Utilities Chapter. Elements of site design could incorporate measures such as energy efficiency which would help to minimise contributions to climate change.
		E2	+/-	M, L-T, I, R, M	Old Oak	The policy states that Old Oak will become a mixed employment hub which may contribute to climate change if not managed through London Plan Policy and guidance within the Environment and Utilities Chapter. .. Elements of site design could incorporate measures such as energy efficiency which would help to minimise contributions to climate change.
		E2 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E2 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	transport, heating and energy	E3	+/-	M, L-T, I, R, M	Park Royal	The policy focuses on enhancing SIL through demonstrating the use and design of sites which will support the integrity and effectiveness of industrial sites. Elements of site design could incorporate measures such as energy efficiency which would help to minimise contributions to climate change. The development of industry would however in the long term contribute to effects upon natural resources and fossil fuels linked to industrial activities if not managed through London Plan Policy and guidance within the Environment and Utilities Chapter.
		E3 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E3 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E4	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E4 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E4 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		E5	+	M, L-T, I, R, L	OPDC area	The primary focus of the policy is to improve access to employment and skills for local people and improved accessibility could contribute towards reducing journey times thus helping to minimise contributions to climate change.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use,	E1	?	M, L-T, I, R, L	OPDC area	The policy focuses on the promotion of Old Oak and Royal Park as a place for enterprise and innovation and the focus on employment development could have implications for increase in waste as well as opportunities for waste facilities and recycling. This would be linked to building design and methods for transporting waste which are considered as per Preferred Policy Option on Waste Minimisation and Preferred Strategic Policy for Transport. However, this is uncertain.
		E2	?	M, L-T, I, R, L	OPDC area	The focus on the provision of workspaces and town centre uses could have implications for increase in waste as well as opportunities for waste facilities and recycling. This would be linked to building design and methods for transporting waste which are considered as per Preferred Policy Option on Waste Minimisation and Preferred Strategic Policy for Transport. However, this is uncertain.
		E2 Option 1	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	recycling and recovery rates as well as composting of all green waste	*E2 Option 2*	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.
		E3	+	M, L-T, I, R, L	OPDC area	The policy focuses on enhancing SIL through demonstrating the use and design of sites will support the integrity and effectiveness of industrial sites. Elements of site design could incorporate waste or recycling facilities which would help to increase recycling rates and waste recovery.
		E3 Option 1	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.
		E3 Option 2	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.
		E4	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.
		E4 Option 1	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.
		E4 Option 2	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.
		E5	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.
9	Improve the quality of the water environment	E1	?	M, L-T, I, R, L	Old Oak and Park Royal	The primary focus on employment and industrial development could have implications for increased water usage as well as opportunities to incorporate measures such as Sustainable Urban Drainage Systems (SuDS). This would be linked to building design, which is considered as part of Preferred Policy on Water. However, this is uncertain.
		E2	?	M, L-T, I, R, L	Old Oak	The primary focus on the provision of workspaces and town centre uses could have implications for increased water usage as well as opportunities to incorporate measures such as SuDS. Waste facilities and recycling. This would be linked to building design however this is uncertain.
		E2 Option 1	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
		E2 Option 2	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
		E3	?	M, L-T, I, R, L	Park Royal	The policy focuses on enhancing SIL through demonstrating the use and design of sites will support the integrity and effectiveness of industrial sites. Elements of site design could potentially include design that incorporates measures such as SuDS.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						Sustainable water measures should be adopted where appropriate as per Preferred Policy on Water.
		E3 Option 1	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
		E3 Option 2	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
		E4	0	N/A	N/A	There is no direct link between the policy and achieving the SA Objective.
		E4 Option 1	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
		E4 Option 2	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
		E5	0	N/A	N/A	The principle of the policy has no direct link with improving the water quality of the environment.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	E1	?	M, L-T, I, R, L	Old Oak and Park Royal	The delivery of employment and industrial uses has the potential to positively impact upon enhancing the diversity of habitats through landscape design though this would be to a limited extent.
		E2	?	M, L-T, I, R, L	Old Oak	The provision of workspaces and town centre uses within Old Oak has the potential to positively impact upon enhancing the diversity of habitats through landscape design though this would be to a limited extent.
		E2 Option 1	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E2 Option 2	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E3	?	M, L-T, I, R, L	Park Royal	The delivery of SIL has the potential to positively impact upon enhancing the diversity of habitats through landscape design though this would be to a limited extent.
		E3 Option 1	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E3 Option 2	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E4	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.

IIA Objective		Policy	Performance of	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		E4 Option 1	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E4 Option 2	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
		E5	0	N/A	N/A	The principle of the policy has no direct link with creating and enhancing biodiversity and the diversity of habitats.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	E1	?	M, L-T, I, R, L	Old Oak and Park Royal	The delivery of employment and industrial uses has the potential to minimise air, noise and light pollution however this would be dependent upon appropriate design, which is considered as part of Preferred Policy Options on Air Quality and Noise.
		E2	?	M, L-T, I, R, L	Old Oak	The provision of workspaces and town centre uses within Old Oak has the potential to minimise air, noise and light pollution however this would be dependent upon appropriate design, which is considered as part of Preferred Policy Options on Air Quality and Noise..
		E2 Option 1	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		E2 Option 2	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		E3	?	M, L-T, I, R, L	Park Royal	The delivery of SIL has the potential to minimise air, noise and light pollution however this would be dependent upon appropriate design and implementation of Environment and Utilities policies.
		E3 Option 1	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		E3 Option 2	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		E4	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		E4 Option 1	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		E4 Option 2	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
		E5	0	N/A	N/A	There is no direct link between the primary focus of the policy and minimising air, noise and light pollution.
12	To conserve and	E1	+	M, L-T, I, R, L	Old Oak and Park Royal	The delivery of employment and industrial uses has the potential to contribute towards conserving the historic environment and protecting heritage assets and their setting

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	enhance the historic environment, heritage assets and their settings					through appropriate design in accordance with Preferred Policy Option for Heritage.
		E2	?	M, L-T, I, R, L	Old Oak	The provision of workspaces and town centre uses within Old Oak has the potential to contribute towards conserving the historic environment and protecting heritage assets and their setting through appropriate design in accordance with Preferred Policy Option for Heritage, but this is uncertain at this stage.
		E2 Option 1	0	N/A	N/A	The policy does not have direct links to conserving and enhancing the historic environment, heritage assets and their settings.
		E2 Option 2	0	N/A	N/A	The policy does not have direct links to conserving and enhancing the historic environment, heritage assets and their settings.
		E3	?	M, L-T, I, R, L	Park Royal	The delivery of SIL has the potential to contribute towards conserving the historic environment and protecting heritage assets and their setting through appropriate design in accordance with Preferred Policy Option for Heritage, but this is uncertain at this stage.
		E3 Option 1	0	N/A	N/A	The policy seeks to enhance SIL and does have direct links to conserving and enhancing the historic environment, heritage assets and their settings.
		E3 Option 2	0	N/A	N/A	The policy seeks to enhance SIL and does have direct links to conserving and enhancing the historic environment, heritage assets and their settings.
		E4	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to support open workspace typologies that are appropriately located and designed which could support the SA Objective through appropriate design that respects its surrounding environment, helping to conserve heritage assets and their setting.
		E4 Option 1	?	N/A	N/A	The policy seeks to deliver onsite open workspaces for residential and/or commercial though unlike the preferred option does not explicitly reference appropriate location and design and therefore effects against the SA Objective would be uncertain.
		E4 Option 2	?	N/A	N/A	The policy seeks to deliver small scale workplaces with coordinated delivery of rented small-scale residential units outside of the SIL though unlike the preferred option does not explicitly reference appropriate location and design and therefore effects against the SA Objective would be uncertain.
		E5	0	N/A	N/A	The primary focus of the policy is to maximise access to employment and training therefore it does not directly link with the SA Objective.
13	Increase community	E1	+	S, M, L-T, I, R, L	OPDC area	The policy principally seeks to establish Old Oak as a recognised employment hub and seeks the delivery of a diverse economy that supports growth. This is considered to to help achieve the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	cohesion and reduce social exclusion to encourage a sense of community and welfare	E2	+	S, M, L-T, I, R, L	Old Oak	The policy states that Old Oak would become a mixed development hub with town centre uses generating employment in accessible locations. In light of OPDC regeneration programmes the policy would make partial contributions towards increasing community cohesion.
		E2 Option 1	0	N/A	N/A	The policy focus is a more flexible approach to office distribution across and would not significantly contribute towards achieving the SA Objective.
		E2 Option 2	0	N/A	N/A	The policy focus is on the provision of additional floor space not for industrial use which would not significantly contribute towards achieving the SA Objective.
		E3	0	N/A	N/A	There is no direct link between the policy and increasing community cohesion, reducing social exclusion or encouraging a sense of community and welfare.
		E3 Option 1	0	N/A	N/A	There is no direct link between the policy and increasing community cohesion, reducing social exclusion or encouraging a sense of community and welfare.
		E3 Option 2	?	S, M, L-T, I R L	Park Royal	The policy would release additional land within Park Royal to accommodate other forms of development which could have the potential to benefit community cohesion but this is uncertain.
		E4	0	N/A	N/A	The policy focus is on the provision of open workspaces which doesn't not directly link with the SA Objective.
		E4 Option 1	0	N/A	N/A	The policy focus is on the provision of onsite workspaces which doesn't not directly link with the SA Objective.
		E4 Option 2	0	N/A	N/A	The policy focus is on the provision of small scale workspaces which doesn't not directly link with the SA Objective.
		E5	+	S, M, L-T, I, R, L	OPDC area	The policy focus is on maximising access to employment, skills training, apprenticeships and pre-employment support and the opportunity to provide pathways to employment could indirectly support the SA Objective by encouraging community cohesion and welfare.
14	Improve safety and reduce crime and the fear of crime	E1	0	N/A	N/A	Establishing Old Oak as a recognised employment hub would not directly link with improving safety or reducing crime.
		E2	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E2 Option 1	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E2 Option 2	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		E3	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E3 Option 1	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E3 Option 2	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E4	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E4 Option 1	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E4 Option 2	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
		E5	0	N/A	N/A	There is no direct link between the policy and improving safety, reducing crime and fear of crime.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	E1	+	S, M, L-T, I, R, L	Old Oak and Park Royal	Whilst delivery of a diverse economy would not directly relate to health, the provision of employment uses would ultimately secure jobs which would help contribute towards maximising wellbeing.
		E2	+	S, M, L-T, I, R, L	Old Oak	Old Oak as a mixed use employment hub will ultimately provide employment and will contribute towards maximising wellbeing.
		E2 Option 1	+	S, M, L-T, I, R, L	Old Oak	The policy would ultimately secure employment which would contribute towards achieving a sense of wellbeing among the population.
		E2 Option 2	+	S, M, L-T, I, R, L	Old Oak	The policy would ultimately secure employment which would contribute towards achieving a sense of wellbeing among the population.
		E3	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4	+	S, M, L-T, I, R, L	OPDC area	The provision of workspace typologies would not directly relate to health but would ultimately create jobs and maximise wellbeing.

IIA Objective		Policy	Performance of	Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		E4 Option 1	+	S, M, L-T, I, R, L	OPDC area	The provision of onsite open workspace typologies would not directly relate to health but would ultimately create jobs and maximise wellbeing.
		E4 Option 2	+	S, M, L-T, I, R, L	OPDC area	The provision of small scale workspace typologies would not directly relate to health but would ultimately create jobs and maximise wellbeing.
		E5	+	S, M, L-T, I, R, L	OPDC area	Maximising access to employment and training could have a positive effect on the wellbeing of the population.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	E1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E2 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E2 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E3 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4 Option 1	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E4 Option 2	0	N/A	N/A	There is no direct link between the policy and the SA Objective.
		E5	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to maximise access to skills training, apprenticeships and pre-employment support all of which would contribute towards improving the skills level of the population.
17	Maximise the social and	E1	++	S, M, L-T, I, R, M	Old Oak and Park Royal	The policy seeks to deliver a diverse economy through promoting Old Oak and Park Royal as a place for enterprise and innovation which would contribute partially towards achieving the SA Objective by maximising economic wellbeing.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	economic wellbeing of the local and regional population and improve access to employment and training	E2	++	M, L-T, I, R, M	Old Oak	The policy states that Old Oak will become a mixed employment hub with a range of flexible workspace typologies and town centre uses generating employment along High Street, in and around Old Oak Common Station and in other accessible locations which would support the improvement of access to employment and maximising economic wellbeing.
		E2 Option 1	+	M, L-T, I, R, M	Old Oak	The policy would give a more flexible approach to office distribution around Old Oak which could contribute towards improving access to employment in the long term.
		E2 Option 2	+/-	M, L-T, I, R, M	Old Oak	The policy would not support B1(b) and B1(a) uses in Old Oak north which would provide for additional floorspace for non-industrial uses however may result in locations unsuited to uses such as retail and office use would remain vacant.
		E3	++	M, L-T, I, R, M	Park Royal	The enhancement of SIL through intensifying use of land including the provision of smaller units to support greater employment densities will help to facilitate employment opportunities which in the long term would contribute towards improving access to employment.
		E3 Option 1	+	M, L-T, I, R, L	Park Royal	The delivery of non-industrial uses to support the functioning of SIL may in the long term contribute towards improving employment access.
		E3 Option 2	+	M, L-T, I, R, L	Park Royal	Additional land release in Park Royal may in the long term contribute towards improving employment access, if it is accommodates appropriate development.
		E4	+	M, L-T, I, R, M	OPDC area	The policy seeks to support affordable workspaces and open workspaces which are appropriately located and do no result in net loss of employment land or floorspace.
		E4 Option 1	+	M, L-T, I, R, M	OPDC area	Delivery of onsite open workspaces for commercial proposals would help to support a diverse local economy and support social and economic wellbeing.
		E4 Option 2	+	M, L-T, I, R, M	OPDC area	The policy could help to support employment access improvements through delivery of small scale workspaces supported with coordinate delivery of rented small scale residential units outside of the SIL.
		E5	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to maximise employment, skills training, apprenticeships and pre-employment as well as delivering OPDC projects all of which would directly support the SA Objective.
18	To encourage inward investment alongside investment	E1	++	M, L-T, I, R, M	Old Oak and Park Royal	The policy seeks to deliver a strong, sustainable, robust local economy that promotes Old Oak and Park Royal as a place for enterprise and innovation which contributes to London's economic growth all of which would help to encourage inward investment alongside investment within existing communities.
		E2	++	M, L-T, I, R, L	Old Oak	Old Oak would become a mixed employment hub providing town centre uses which generate employment along High Street, in and around Old Oak Common Station and in

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	within existing communities, to create sustainable economic growth					other accessible areas, supporting this SA Objective.
		E2 Option 1	+	M, L-T, I, R, L	Old Oak	The policy would not focus B1(a) uses in and around Old Oak Common Station though the flexible approach to office distribution could support sustainable growth of the economy. The policy would however mean that the commercial centre around Old Oak Common Station could become less defined so it is considered that the preferred option performs more strongly against this SA Objective.
		E2 Option 2	+/-	M, L-T, I, R, L	Old Oak	The policy would not support B1(b) and B1(c) and this approach would provide for additional floorspace for non-industrial uses which would offer benefits to the SA Objective. The disadvantage of the policy however, would be that locations not suited to retail, office, leisure or residential uses could remain vacant which could negatively impact on the amenity of the public realm and may have a negative effect with regards to encouraging inward investment and creating sustainable growth.
		E3	++	M, L-T, I, R, M	Park Royal	The policy seeks to protect SIL and support adjacent uses. It also designates five new SIL sites and this in the long term could help to encourage inward investment.
		E3 Option 1	+	M, L-T, I, R, M	Park Royal	The policy proposes not to extend the SIL boundary which could deliver non-industrial uses which support the functioning of SIL and would contribute to encouraging investment.
		E3 Option 2	+/-	M, L-T, I, R, L	Park Royal	Inward investment would be encouraged through the release of additional land in Park Royal to accommodate other forms of development, however, this could put pressure on industrial land capacity and threaten the economic growth of Park Royal.
		E4	+	M, L-T, I, R, M	OPDC area	The policy would contribute to supporting inward investment as it seeks to support open workspace typologies and temporary workspaces contributing to establishing and/or growing an existing new business sector that would positively contribute to economic and social regeneration of the area.
		E4 Option 1	+	M, L-T, I, R, M	OPDC area	The delivery of onsite open workspaces for residential or commercial proposals could help to support a diverse local economy and could help to attract inward investment.
		E4 Option 2	+	M, L-T, I, R, M	OPDC area	The delivery of small scale workspaces coordinated with delivery of rented small-scale residential units outside SIL could partially contribute to attracting investment as development would support start-up businesses.
		E5	+	M, L-T, I, R, M	OPDC area	The policy principally seeks to maximise access to employment and training for local people which could contribute towards attracting inward investment

Table G-7 Chapter 9: Town Centre Uses

- TC1: Strategic Policy: Town Centre uses
- TC2: Town centre hierarchy
- TC3: Vibrancy
- TC4: Retail and eating and drinking establishment needs
- TC5: Culture, Sports and Leisure Facilities
- TC6: Visitor Accommodation
- TC7: Hours of operation for night time economy uses

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	TC1	++	S,M,L-T, D,R,H	Old Oak and Park Royal	The policy states that ' *Town centre uses can play a critical role in place-making, adding vibrancy to buildings and the public realm and helping to attract people to live, work and visit the area'*.
		TC2	++	S,M,L-T, D,R,H	Old Oak High Street, Park Royal and North Acton.	The policy demands that the centres should be of a sufficient size that they meet needs, promote sustainability and assist with place-making. A new major town centre in Old Oak would have significant benefits to place-making in the area, providing opportunities for the provision of a range of culture, sports and leisure facilities which as well as meeting local need, could make a significant contribution to strategic provision and help to promote London as the world's cultural capital, as set out in the Mayor's Cultural Strategy.
		TC2 Option 1	+/-	S,M,L-T, D,R,H	OPDC area	This option would have benefits in terms of making Old Oak a destination that people will be attracted to and could have benefits for place-making by attracting higher footfall. However, this option could impact on the vitality and viability of the surrounding town centre hierarchy and the neighbouring town centres of Ealing, Shepherd's Bush and Kingston.
		TC2 Option 2	+	S,M,L-T, I,R,L	OPDC area and Old Oak High Street	Two new centres at Old Oak and Old Oak Common Station would have benefits to place-making in the area meeting local need. However, this option does not directly support the delivery of catalyst uses around Old Oak Common Station.
		TC2 Option 3	+/-	S,M,L-T, D,R,H	OPDC and surrounding area	The designation of a district centre to the south of the canal would better capture the scale of need for town centre uses arising from the population living, working and visiting the area than in option 2. However, to the north of the canal, the designation of a neighbourhood centre would not be capable of providing sufficient town centre uses to meet the areas need. This could be met to a certain degree by the District Centre at Old Oak Common station and the District Centre at Harlesden, but there would also be a risk that premises in this area would struggle and the limited quantum of town centre uses may impact on place-making.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC2 Option 4	+/-	S,M,L-T, I,R,L	OPDC area	This option would have benefits for delivering new employment space within Park Royal. However, the potential dispersal of town centre walk-to uses may have negative impacts on accessibility of these uses and, in turn, impacts on road congestion.
		TC3	++	S,M,L-T, D,R,H	OPDC and surrounding area	Town centre uses play an important role in place-making, by attracting people to an area and helping to enliven it. Town centre uses within the OPDC area, particularly in Old Oak, will help to play a critical role in the approach to place-making. An important way of achieving this is through activating and overlooking the public realm, by providing outdoor uses such as event space, outdoor seating associated with eating and drinking establishments and through the provision of street markets.
		TC3 Option 1	+	S,M,L-T, D,R,H	OPDC and surrounding area	The choice of land use may affect the ability to create a sense of place. The option maintains that Town centre uses within the OPDC area will help to play a critical role in the approach to place-making with flexibility around uses such as betting shops, pay-day loan shops and takeaways.
		TC4	++	S,M,L-T, D,R,H	OPDC and surrounding area	The policy states that if there is not enough A-class floorspace, people will be required to travel further for their needs, putting increased pressures on the transport network and undermining the place-making benefits that A-class floorspace could bring to the OPDC area. The policy seeks to deliver the necessary place-making benefits for the OPDC area.
		TC4 Option 1	+/-	S,M,L-T, D,R,H	OPDC and surrounding area	This option would have potential benefits in terms of place-making, by creating a greater retail draw and providing more opportunities for active uses. However, this option could impact on the vitality and viability of surrounding retail centres outside of the OPDC area and as a consequence, this policy approach has not been identified as the preferred option.
		TC5	+	S,M,L-T, D,R,H	OPDC and surrounding area	The policy states that culture, sports and leisure facilities make an important contribution to place-making, could be important catalyst uses and could help to define and shape the place and add to vibrancy and activity by attracting visitors to an area. It can also help and support place-making and/or act as a catalyst for regeneration.
		TC5 Option 1	+	S,M,L-T, D,R,M	OPDC and surrounding area	This option would provide a clearer indication of the acceptable quantum of floorspace for other town centre uses, providing greater certainty to stakeholders, but this approach would constrain the ability for these sorts of uses to aid with place-making and could potential prevent a major cultural, sports or leisure use from locating the area that could act as a catalyst for regeneration and provide a strategic cultural or leisure destination.
		TC6	+	S,M,L-T, I,R,L	OPDC and	Visitor accommodation is an element that contributes to creating a place. The policy

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding area	highlights the importance of hotels for leisure and business that could help the tourism sector in the area.
		TC7	++	S,M,L-T, D,R,M	OPDC and surrounding area	Night-time economy uses play an important role in place-making, by attracting people to an area and helping to enliven it. Eating and drinking establishments and culture, sports and entertainment uses should create a sense of place for local residents and visitors to the area. Limits have been imposed to ensure activity is kept within sensible hours.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	TC1	+	S,M,L-T, I,R,L	OPDC area and London wide	The policy relates to focussing development i higher density town centre locations such as Old Oak and Park Royal.
		TC2	+	S,M,L-T, I,R,M	OPDC area	The policy states the centres should be of sufficient size to accommodate residents and users. The aim is for higher densities in appropriate areas trying to seek the best balance of efficient land use. This must take into account the use of land within the centre boundary.
		TC2 Option 1	+	S,M,L-T, I,R,L	Old Oak High Street	The option to concentrate town centre development in this area should optimise the efficient use of land at Old Oak High Street. The delivery of a Metropolitan Centre would enable the delivery of greater amounts of town centre uses representing a potential greater optimisation of the use of land.
		TC2 Option 2	+	S,M,L-T, I,R,L	Old Oak	The option to concentrate town centre development in this area should optimise the efficient use of land at Old Oak. The delivery of smaller town centre typologies would not enable the delivery of the same amount of retail uses compared to the preferred policy option.
		TC2 Option 3	+	S,M,L-T, I,R,L	Old Oak	The option to concentrate town centre development in this area should optimise the efficient use of land at Old Oak. The delivery of smaller town centre typologies would not enable the delivery of the same amount of retail uses compared to the preferred policy option.
		TC2 Option 4	+	S,M,L-T, I,R,L	Park Royal	The option to use Park Royal Centre for other uses may enable more employment floorspace to be delivered thereby affecting the area's density and building heights.
		TC3	0			The policy seeks to optimise the development of brownfield land, which could have direct significant benefits against this objective. Measures to improve vibrancy would not affect efficient land use.
		TC3 Option 1	0			This option would not affect efficient land use.
		TC4	+	S,M,L-T, I,R,L	OPDC area	The preferred policy to deliver A classes that serve the needs of the development and complement nearby centres would support the efficient use of land.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC4 Option 1	++	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver a higher amounts of A classes would enable greater optimisation of the efficient use of land.
		TC5	+	S,M,L-T, I,R,L	Old Oak	The preferred policy option to deliver culture, sports and leisure facilities would support the efficient use of land.
		TC5 Option 1	0			This option would not affect efficient land use.
		TC6	+	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver visitor accommodation would support the efficient use of land.
		TC7	0			The policy would not affect efficient land use.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	TC1	+	S,M,L-T, I,R,L	OPDC area and London wide	Any new development within the town centre would be built on brownfield sites.
		TC2	++	S,M,L-T, I,R,M	OPDC area	The policy states the centres should be of sufficient size to accommodate residents and users. Town Centre regeneration in this location could have benefits in that development could lead to the remediation of contaminated land as well as replacing potentially contaminating land uses with other developments.
		TC2 Option 1	+	S,M,L-T, I,R,L	OPDC area	The option to concentrate town centre development in this area should maximise the reuse of brownfield land at Old Oak High Street.
		TC2 Option 2	+	S,M,L-T, I,R,L	OPDC area	The option to concentrate town centre development in this area should maximise the reuse of brownfield land at Old Oak.
		TC2 Option 3	+	S,M,L-T, I,R,L	OPDC area	The option to concentrate town centre development in this area should maximise the reuse of brownfield land at Old Oak.
		TC2 Option 4	+/-	S,M,L-T, I,R,L	OPDC area	The option to use Park Royal for other uses may affect the choice of land for development.
		TC3	0			The policy seeks to optimise the development of brownfield land, which could have direct significant benefits against this objective. Measures to improve vibrancy would not affect efficient land use.
		TC3 Option 1	0			This option would not affect efficient land use.
		TC4	+	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver A classes that serve the needs of the development and complement nearby centres would support the maximum reuse of brownfield land..
		TC4 Option 1	++	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver a higher amounts of A classes would enable greater optimisation of the efficient use of land.
		TC5	+	S,M,L-T, I,R,L	Old Oak	The preferred policy option to deliver culture, sports and leisure facilities would support the maximum reuse of brownfield of land.

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		TC5 Option 1	0			This option would not affect efficient land use.
		TC6	+	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver visitor accommodation would support the maximum reuse of brownfield land.
		TC7	0			The policy would not maximise the use of previously developed land.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	TC1	+	S,M,L-T, I,R,L	OPDC area and London wide	The policy states the need to develop a network of new town and local centres that are the focus for town centre uses and which complement and enhance London's wider network of centres. This can indirectly minimise the excessive need for travel with a well-connected transport network.
		TC2	++	S,M,L-T, D,R,H	OPDC area and London wide	Reduce the need to travel by car and do not have an adverse impact on the operation of the road network. The public transport accessibility that will be afforded to the area, making Old Oak a highly sustainable location for town centre uses, reducing the need for people in the surrounding area to travel to these uses by private vehicle. Retail and other town centre uses should be focussed within the designated town centres and neighbourhood centres. However, in accordance with the sequential test, if there are no suitable sites within these designated centres there may be the potential for town centre uses in edge of centre or out of centre locations. This would be supported where it addresses a specific deficiency in need, such as in areas further away from the designated centres or where they provide local convenience retail that reduces the need to travel. The proposed hierarchy could work well in terms of maximising sustainable transport use by focussing key services and attractions in the largest accessible locations with smaller amounts in more local areas for local needs.
		TC2 Option 1	+	S,M,L-T, D,R,M	OPDC area	This option focuses on high public transport accessibility to promote Old Oak High Street as a major metropolitan centre destination. Access to the town centre typologies in this option would rely on the same transport network as the preferred policy option.
		TC2 Option 2	+	S,M,L-T, D,R,M	OPDC area	New district and neighbourhood centres would require sufficient transport networks to and from the sites Access to the town centre typologies in this option would rely on the same transport network as the preferred policy option.
		TC2 Option 3	+	S,M,L-T, D,R,M	OPDC area	New district and neighbourhood centres would require sufficient transport networks to and from the sites. Access to the town centre typologies in this option would rely on the same transport network as the preferred policy option.
		TC2 Option 4	+/-	S,M,L-T,D,R,M	OPDC and surrounding area	An approach to minimise this impact might be to de-designate the centre and allow for its gradual erosion to other uses such as employment and residential including local 'walk to' services. However, this approach could also result in worse impacts on the highway network as if the town centre uses were diminished, workers and residents in Park Royal

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						would have to travel further for their services. It would also see the loss of well used existing local services over time.
		TC3	++	L-T, I, R, L	OPDC area	The policy seeks to deliver a range of land uses and associated town centre infrastructure. This could help to reduce the need to travel for both existing and incoming communities, which could have long term benefits against this objective.
		TC3 Option 1	++	M-T, D,R,M	OPDC area	This option could help to reduce the need to travel and would not look to resist these uses and would instead consider proposals for such uses on their merits, having regard to their impact on amenity, transport and other Local Plan considerations.
		TC4	++	M-T, D,R,M	OPDC area	The policy seeks to deliver A Use Class land uses which could help to reduce the need to travel for both existing and incoming communities and could have long term benefits against this objective
		TC4 Option 1	+/-	S,M,L-T, D,R,M	OPDC and wider area	The option for OPDC to be a greater retail destination with a higher quantum of retail over and above that required to serve the needs of the development. This would impose greater demand on the transport network and generate more trips from a wider area but could also be used to inform public transport services business planning to inform the delivery of additional infrastructure. However, should this not be undertaken, higher amounts of town centre uses may cause disruption and highway pressure on the area.
		TC5	+	M-T, D,R,M	OPDC area	The policy clarifies that OPDC will be supportive of the provision of new facilities, where they demonstrably address either a local or strategic need and do not give rise to an unacceptable impact on the amenity of existing and future residents, businesses or on the transport network.
		TC5 Option 1	+	S,M,L-T, D,R,M	OPDC area	This approach could potentially prevent a major cultural, sports or leisure use from locating the area that could act as a catalyst for regeneration and provide a strategic cultural or leisure destination. This more reserved option should limit the impact on the transport network.
		TC6	++	S,M,L-T,D,R,M	OPDC and surrounding area	The policy states that hotels are well suited to areas of high public transport access and therefore, parts of the OPDC area and particularly the Old Oak area would be appropriate locations to consider promoting visitor accommodation.
		TC7	0			The policy proposes closing times of establishments. This may relieve pressure to provider late night public transport services. This may have an indirect effect on the transport network.
5	Improve access to well designed, well-located, market,	TC1	0			The policy would not have any significant effects for the objective.
		TC2	0			The policy would not have any significant effects for the objective.
		TC2 Option 1	0			The option would not have any significant effects for the objective.

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	affordable and inclusive housing of a range of types and tenures, to meet identified local needs	*TC2 Option 2*	0			The option would not have any significant effects for the objective
		TC2 Option 3	0			The option would not have any significant effects for the objective
		TC2 Option 4	0			The option would not have any significant effects for the objective
		TC3	0			The policy would not have any significant effects for the objective.
		TC3 Option 1	0			The option would not bring any benefits for the objective
		TC4	0			The policy would not have any significant effects for the objective.
		TC4 Option 1	0			The option would not have any significant effects for the objective
		TC5	0			The policy would not have any significant effects for the objective.
		TC5 Option 1	0			The option would not have any significant effects for the objective
		TC6	0			The policy would not have any significant effects the objective.
		TC7	0			The policy would not have any significant effects the objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	TC1	0	S,M,L-T, I,R,L	Old Oak High Street, Park Royal Centre, North Acton	The policy does not specifically address climate change issues as it relates to town centre uses – such issues are addressed in Policy EU1.
		TC2	-	M, L-T, D, IR, L	OPDC area and surrounding boroughs	An increase in development at Old Oak High Street, North Acton and Park Royal could lead to an increase in built development. This could have negative effects in relation to surface water and flooding if not adequately mitigated through the implementation of policies within the Environment and Utilities Chapter.
		TC2 Option 1	-	M, L-T, D, IR, L	OPDC area and surrounding boroughs	Development at Old Oak High Street could lead to an increase in built development. This could have negative effects in relation to surface water and flooding if not adequately mitigated through the implementation of policies within the Environment and Utilities Chapter.
		TC2 Option 2	-	M, L-T, D, IR, L	OPDC area and surrounding boroughs	Development at Old Oak could lead to an increase in built development. This could have negative effects in relation to surface water and flooding if not adequately mitigated through the implementation of policies within the Environment and Utilities Chapter.
		TC2 Option 3	-	M, L-T, D, IR, L	OPDC area and	Development at Old Oak could lead to an increase in built development. This could have negative effects in relation to surface water and flooding if not adequately mitigated

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					surrounding boroughs	through the implementation of policies within the Environment and Utilities Chapter.
		TC2 Option 4	-	M, L-T, D, IR, L	OPDC area and surrounding boroughs	Development at Park Royal could lead to an increase in built development. This could have negative effects in relation to surface water and flooding if not adequately mitigated through the implementation of policies within the Environment and Utilities Chapter.
		TC3	0			The policy would not have any significant effects for the objective.
		TC3 Option 1	0			The option would not have any significant effects for the objective.
		TC4	0			The policy would not have any significant effects for the objective.
		TC4 Option 1	0			The option would not have any significant effects for the objective.
		TC5	0			The policy would not have any significant effects for the objective.
		TC5 Option 1	0			The option would not have any significant effects for the objective.
		TC6	0			The policy would not have any significant effects for the objective.
		TC7	0			The policy would not have any significant effects for the objective.
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	TC1	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.
		TC2	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.
		TC2 Option 1	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.
		TC2 Option 2	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.
		TC2 Option 3	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses proposed more viable.
		TC2 Option 4	+	S,M,L-T, I,R,L	Nationwide	Town centres provide clusters and higher densities which may make it easier for shared power and heating. This would also make travel by sustainable means to the key uses

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						proposed more viable.
		TC3	0			The policy would not have any significant effects for the objective.
		TC3 Option 1	0			This option would not have any significant effects for the objective.
		TC4	0			The policy would not have any significant effects for the objective.
		TC4 Option 1	0			This option would not have any significant effects for the objective.
		TC5	0			The policy would not have any significant effects for the objective.
		TC5 Option 1	0			This option would not have any significant effects for the objective.
		TC6	0			The policy would not have any significant effects for the objective.
		TC7	0			The policy would not have any significant effects for the objective.
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	TC1	+	S,M,L-T, I,R,L	OPDC area	The principle of focusing retail and leisure uses in town centres can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TC2	+	S,M,L-T, I,R,L	OPDC area	The principle of focusing retail and leisure uses in town centres can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TC2 Option 1	+/-	S,M,L-T, I,R,M	OPDC area	The principle of focusing retail and leisure uses in town centres can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity. This option would deliver greater amounts of town centre uses which may result in higher levels of operational waste generated if not adequately managed by waste policies in the Environment and Utilities Chapter.
		TC2 Option 2	+	S,M,L-T, I,R,L	OPDC area	The principle of focusing retail and leisure uses in town centres can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TC2 Option 3	+	S,M,L-T, I,R,L	OPDC area	The principle of focusing retail and leisure uses in town centres can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TC2 Option 4	+/-	S,M,L-T, I,R,M	OPDC area	This option would potentially see town centre walk to uses dispersed across Park Royal which may result in less efficient collection of operational waste if not adequately managed by waste policies in the Environment and Utilities Chapter.
		TC3	?			The policy will not directly contribute to benefits against this objective However, the emphasis on high quality places should contribute to the use of visibly aesthetic recyclable materials and aim to minimise transporting waste.

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		TC3 Option 1	+	S,M,L-T, I,R,M	OPDC area	Managing the number of takeaways and fast food outlets could have a positive impact on managing operational waste created by these uses.
		TC4	+/-	S,M,L-T, I,R,M	OPDC area	Delivery of A Use Classes will need to be supported by the implementation of Environment and Utilities policies to manage operational waste.
		TC4 Option 1	+/-	S,M,L-T, I,R,M	OPDC area	Delivery of A Use Classes will need to be supported by the implementation of Environment and Utilities policies to manage operational waste.
		TC5	+/-	S,M,L-T, I,R,M	OPDC area	Delivery of culture, leisure and sports facilities will need to be supported by the implementation of Environment and Utilities policies to manage operational waste.
		TC5 Option 1	0			The option would not have any significant effects for the objective.
		TC6	+/-	S,M,L-T, I,R,M	OPDC area	Delivery of visitor accommodation will need to be supported by the implementation of Environment and Utilities policies to manage operational waste.
		TC7	0			Existing or new night-time economy uses should not have a significant effect on the production of waste. Waste generated by the facility will be dealt with the same as any other use.
9	Improve the quality of the water environment	TC1	0			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC2	0			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC2 Option 1	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC2 Option 2	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC2 Option 3	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC2 Option 4	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC3	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						development ahead of occupation.
		TC3 Option 1	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC4	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC4 Option 1	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC5	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC5 Option 1	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC6	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
		TC7	0			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructural capacity is sufficient to accommodate new development ahead of occupation.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	TC1	0			. The policy would not have any significant effects for the objective.
		TC2	0			. The policy would not have any significant effects for the objective.
		TC2 Option 1	0			This option would not have any significant effects for the objective.
		TC2 Option 2	0			This option would not have any significant effects for the objective.
		TC2 Option 3	0			This option would not have any significant effects for the objective.
		TC2 Option 4	0			This option would not have any significant effects for the objective.
		TC3	0			. The policy would not have any significant effects for the objective.
		TC3 Option 1	0			The policy would not have any significant effects for the objective.

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		TC4	0			The policy would not have any significant effects for the objective.
		TC4 Option 1	0			The option would not have any significant effects for the objective.
		TC5	0			The policy would not have any significant effects for the objective.
		TC5 Option 1	0			The option would not have any significant effects for the objective.
		TC6	0			The policy would not have any significant effects for the objective.
		TC7	0			The policy would not have any significant effects for the objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	TC1	+/-	S,M,L-T, I,R,L	OPDC area	There is no direct relationship between objective and policy. However, focussing retail and leisure uses within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, focussing retail and leisure uses within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC2 Option 1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, focussing retail and leisure uses within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC2 Option 2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, focussing retail and leisure uses within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC2 Option 3	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, focussing retail and leisure uses within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC2 Option 4	+/-	S, M, L-T, I, R, M	OPDC area and	This option could result in town centre walk-to uses being dispersed across Park Royal which may result in additional use of private transport and impacts on air quality.

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					surrounding boroughs	
		TC3	0			Minimisation of air, noise and light pollution caused by traffic and commercial uses during the construction and operation of development on existing town centres and communities will help maintain the vibrancy of the area.
		TC3 Option 1	0			The policy would not have any significant effects for the objective.
		TC4	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, focussing A use classes within town centres will encourage people to use sustainable public transport. \ Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC4 Option 1	+/-	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	There is no direct relationship between objective and policy. However, a greater amount of retail floorspace will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TC5	0			The policy would not have any significant effects for the objective.
		TC5 Option 1	0			The policy would not have any significant effects for the objective.
		TC6	-	S, M, L-T, I, IR, L	OPDC area and surrounding boroughs	Greater volumes of tourists to the area may result in higher amounts of vehicular transport and resultant air pollution if the area is not supported by appropriate public transport infrastructure.
		TC7	+	S, M, L-T, I, IR, L	OPDC area	The policy states that proposals for late licenses will be assessed in terms of the uses impact on residential amenity and will consider issues such as noise within the premises, smells, light pollution and the impact of those going to and from the facility, considering issues such as traffic and car parking and anti-social behaviour. As such this would benefit the objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	TC1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy.
		TC2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental

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					boroughs	effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy..
		TC2 Option 1	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy.
		TC2 Option 2	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy.
		TC2 Option 3	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy.
		TC2 Option 4	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D6 and London Plan policy.
		TC3	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy could lead to the preservation of the historic environment through a focus on creating an attractive, locally distinctive, vibrant town centre. Regeneration and intensification must recognise the importance of heritage and historic environment as referred to in Policy D6.
		TC3 Option 1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	This option could lead to the preservation of the historic environment due to the more flexible approach of OPDC over proposals.
		TC4	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy could lead to the preservation of the historic environment through a focus on not adversely affecting the vitality and viability of nearby centres in the development of any new A-class uses.
		TC4	?			This option may have a detrimental effect on the objective due to a lesser importance

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		Option 1				placed on the vitality and viability of the town centre.
		TC5	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy could lead to the preservation of the historic environment depending on the nature of the cultural, sports and leisure uses.
		TC5 Option 1	?			The policy would not have any significant effects for the objective.
		TC6	+/-	S, M, L-T, I, R, M	OPDC and London wide	The policy could lead to the preservation of the historic environment but the potential design of proposals may have a detrimental effect on the character of the area if not adequately managed by design policies within the Design Chapter and London Plan.
		TC7	0			As explained in the policy London Plan policy 4.6 requires local planning authorities in their Local Plans to minimise the impact of night time economy uses on other land uses taking account of the cumulative effects of night time uses and saturation levels beyond which they have unacceptable impacts on the environmental standards befitting a world city and quality of life for local residents. This statement should protect the historic environment and any heritage assets.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	TC1	++	S,M,L-T, D,R,H	Nationwide	The policy states that the NPPF promotes the role that town centre uses can play in supporting the needs of those living, working and visiting an area and that town centres should sit as the heart of communities. This encompasses all of the community and increases cohesion.
		TC2	+	M, L-T, I, R, L	OPDC area	The development of new town centres could lead to an increased sense of community cohesion over the existing situation, as the development would generate a significant number of housing, jobs and a mix of other community focused uses.
		TC2 Option 1	+/-	M, L-T, D, R, M	OPDC area	The development of a new metropolitan centre at Old Oak Street could lead to an increased sense of community cohesion and this option would have benefits in terms of making Old Oak a destination that people will be attracted to and could improve the community. However, this could have a detrimental effect on the other town centres in the OPDC area.
		TC2 Option 2	+/-	M, L-T, D, R, M	OPDC area	The development of a new district centre and neighbourhood centre in Old Oak could lead to an increased sense of community cohesion and minimise impacts on nearby town centres such as Harlesden, Ealing and Shepherd's Bush. However, the designation would be likely to only provide sufficient floorspace to provide for retail needs and would not allow for the provision of a significant quantum of culture, sports or leisure uses within these centres.
		TC2	+/-	M, L-T, D, R,	OPDC area	The development of a new district centre and neighbourhood centre in Old Oak could

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 3		LM		lead to an increased sense of community cohesion and minimise impacts on nearby town centres. There would also be a risk that premises in this area would struggle and the limited quantum of town centre uses may impact on the community.
		TC2 Option 4	-	M, L-T, D, R, M	OPDC area	This option could result in negative impacts on the highway network as the town centre uses were diminished or dispersed, workers and residents in Park Royal would have to travel further for their services. It would also see the loss of well used existing local services over time which would have a negative effect on the community.
		TC3	++	M, L-T, D, R, M	OPDC area and London wide	Vibrant town centre uses, regeneration links with London and a healthy mix of retailers in the area should benefit the community cohesion through entertainment, employment and social infrastructure.
		TC3 Option 1	+/-	M, L-T, D, R, LM	OPDC area and surrounding boroughs	This option would take careful consideration over the uses in the area and the impact it would have on the existing services and the community. This would allow the OPDC to be more responsive to market demands, thereby, satisfying the local people. However, the option could result in a spread of these uses away from the OPDC area
		TC4	++	S,M,L-T, D,R,H	OPDC area	It is important that an appropriate quantum of A-class uses are provided to support the needs of those living, working and visiting Old Oak and Park Royal. It will be important to achieve the right balance and consider how OPDC can be flexible and respond to future changing market conditions and local need.
		TC4 Option 1	+/-	S,M, L-T, D, R, LM	OPDC area and surrounding boroughs	The option would potential benefits by creating more retail opportunities but this could impact on the surrounding retail centres meaning the effects on the community would be mixed. However, most people would travel from outside the area to use the shops.
		TC5	+	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC is keen to ensure that there is access to all new sports facilities for local communities and OPDC will seek to secure a proportion of affordable sports and leisure provision. This should improve community cohesion and reduce social exclusion.
		TC5 Option 1	?	S,M,L-T, I,R,M	OPDC area	The quantum threshold for culture, sports and leisure uses could constrain the ability for these sorts of uses to help the community and could potential prevent a major cultural, sports or leisure use from locating the area that could act as a catalyst for regeneration and provide a strategic cultural or leisure destination.
		TC6	+	S,M,L-T, D,R,H	OPDC and surrounding area	More high quality visitor accommodation will improve the tourism sector in the area, thereby, improving the local economy with community benefits. A more prosperous local economy should create more community cohesion.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC7	+	S,M,L-T, D,R,H	OPDC area	Night time entertainment should play an important role in the vibrancy of the area, thereby, improving community cohesion and adding activity to the public realm and supporting the local economy. This is supported as the policy seeks to impose sensible limits on hours.
14	Improve safety and reduce crime and the fear of crime	TC1	+/-	S,M,L-T, I,R,M	OPDC and surrounding area	Supporting the area with new cultural destinations and town centres should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TC2	+/-	M.L-T, I, R, L	OPDC and surrounding area	Supporting the area with new cultural destinations and town centres should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TC2 Option 1	+/-	M,L-T, I, R, M	OPDC and surrounding area	Supporting the area with a metropolitan town centre should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TC2 Option 2	+/-	M,L-T, I, R, M	OPDC and surrounding area	Supporting the area with a district and neighbourhood town centre should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TC2 Option 3	+/-	M,L-T, I, R, M	OPDC and surrounding area	Supporting the area with a district and neighbourhood town centre should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TC2 Option 4	-	S,M,L-T, I,R,M	OPDC area	This option may see town centre uses dispersed across Park Royal. If not supported to by public realm and building design improvements set out in the Places Chapter, this may have a negative impact on safety and fear of crime.
		TC3	+	M, L-T, I, R, L	London wide	The optimisation of development in the town centres, including facility security and strategic infrastructure that could improve traffic management, could lead to benefits against this objective through improved safety.
		TC3 Option 1	+	M, L-T, I, R, L	London wide	The optimisation of development in the town centres, including facility security and strategic infrastructure that could improve traffic management, could lead to benefits against this objective through improved safety.
		TC4	+	M, L-T, I, R, L	London wide	The optimisation of A-class development, including facility/customer security and strategic infrastructure that could improve traffic management, could lead to benefits against this objective through improved safety.
		TC4 Option 1	+	M, L-T, I, R, L	London wide	The optimisation of A-class development, including facility/customer security and strategic infrastructure that could improve traffic management, as there will be more incoming traffic due to increased retail use. This could lead to benefits against this objective through improved safety.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC5	+	M, L-T, I, R, M	London wide	A new leisure facility should provide high level security and natural surveillance to increase the safety of the users.
		TC5 Option 1	+	M, L-T, I, R, M	London wide	A new leisure facility should provide high level security and natural surveillance to increase the safety of the users.
		TC6	?			Visitor accommodation should provide high level security and natural surveillance to increase the safety of their guests. The accommodation will attract more visitors with uncertain effects on crime.
		TC7	+/-	S,M,L-T, I,R,L	OPDC area	Security is an important aspect of night-time uses. The safety and wellbeing of local residents and users at drinking establishments must have high security and surveillance in place during and after operating hours. Imposing hours for trade may help prevent crime but the certainty is low.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	TC1	+	S,M,L-T, I,R,M	OPDC area	The policy makes it clear that OPDC will support proposals for town centres uses that promote social and economic regeneration and healthy lifestyles. Town centre uses can also promote healthy lifestyles and OPDC's role as a 'Healthy New Town'.
		TC2	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	New town centre development and maintenance of existing centres could contribute to meeting the need for homes as well as the provision of health centres contributing to the achievement of benefits against this objective.
		TC2 Option 1	+	S, M, L-T, I, R, M	OPDC area	Old Oak High Street as a metropolitan centre could provide and attract additional social infrastructure such as health centres.
		TC2 Option 2	+	S, M, L-T, I, R, M	OPDC are	Old Oak District Centre could provide social infrastructure such as health centres.
		TC2 Option 3	+	S, M, L-T, I, R, M	OPDC area	Old Oak District Centre could provide social infrastructure such as health centres.
		TC2 Option 4	-	S, M, L-T, I, R, M	OPDC and surrounding area.	Not using Park Royal as a Neighbourhood Centre may mean employees and residents would have to travel further for their health services. It would also see the loss of well used existing local services over time.
		TC3	+	S, M, L-T, D, R, H	London wide	As explained in the policy the London Plan (2015) policies 2.15 and 4.8 support proposals that sustain and enhance the viability of a town centre, promote healthy living, support and enhance the competitiveness, quality and diversity of town centre uses and that contribute towards enhancing the public realm.
		TC3 Option 1	-	S, M, L-T, D, R, L	OPDC area	The option would have perceptual significant negatives as it could result in the proliferation of these uses and would not promote OPDC's role as a healthy new part of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						London.
		TC4	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to facilitate the supply of local food through the provision of space for uses such as allotments or farmers markets and reduce the potential for an over-concentration of hot food takeaways in the local area. This should contribute to benefits against the objective.
		TC4 Option 1	+	S, M, L-T, I, R, M	OPDC area	.A strong retail focus with accompanying eating establishments would not have a direct effect on the health of the community but a facility that supports the need of the user should improve healthy living. From a retail perspective, this would be more likely to be achieved through greater active uses.
		TC5	++	S, M, L-T, D, R, H	OPDC and London wide	Culture, sports and leisure facilities will be expected to cater for a range of incomes, particularly those in low incomes who are often excluded from access to such facilities or whose choice is often limited. This will be especially important for access to sports facilities. There is a direct correlation between income deprivation and obesity and as a healthy new London quarter, OPDC is keen to ensure that there is access for all to new sports facilities for local communities and OPDC will seek to secure a proportion of affordable sports and leisure provision.
		TC5 Option 1	+	S, M, L-T, D, R, M	OPDC and London wide	OPDC is keen to ensure that there is access for all to new sports facilities for local communities and OPDC will seek to secure a proportion of affordable sports and leisure provision. However, the option imposes a limit on these uses.
		TC6	0			The option will not directly contribute to benefits against this objective.
		TC7	+	S, M, L-T, I, R, M	OPDC area	Seeking to manage the hours of operation of evening and night time economy uses would help to manage the impact on building user amenity and users' health and well-being.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	TC1	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	New town centre development and maintenance of existing centres could contribute to meeting the need for homes as well as the provision of new schools contributing to the achievement of benefits against this objective.
		TC2	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The provision of retail space will help to generate new job and skills development opportunities that will benefit local people.
		TC2 Option 1	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The provision of a greater amount of retail space within a metropolitan centre will help to generate new job and skills development opportunities that will benefit local people.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC2 Option 2	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The provision of retail space will help to generate new job and skills development opportunities that will benefit local people.
		TC2 Option 3	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The provision of retail space will help to generate new job and skills development opportunities that will benefit local people.
		TC2 Option 4	0			The option will not directly contribute to benefits against this objective.
		TC3	0			The policy will not directly contribute to benefits against this objective.
		TC3 Option 1	0			The option will not directly contribute to benefits against this objective.
		TC4	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new A Use Class development will help to generate new job and skills development opportunities that will benefit local people.
		TC4 Option 1	0			The option will not directly contribute to benefits against this objective.
		TC5	++	S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and how this role can help widen the reach of and access to culture, support education skills and careers and enhance the physical environment. The delivery of new cultural, sports and leisure facilities will help to generate new job and skills development opportunities that will benefit local people.
		TC5 Option 1	+	S, M, L-T, D, R, H	OPDC and London wide	The option will offer leisure and sports education in the area.
		TC6	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new visitor accommodation will help to generate new job and skills development opportunities that will benefit local people.
		TC7	0			The option will not directly contribute to benefits against this objective.
17	Maximise the social and economic wellbeing of the	TC1	++	S,M,L-T, I,R,M	OPDC area	Town centre uses can also add to the economic prosperity of an area, helping to provide a range of employment opportunities over a wide range of sectors and skill levels. Town centre uses will play a critical role in achieving this, providing new employment and services and adding vibrancy and activity. To support these centres, employment and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	local and regional population and improve access to employment and training					residential uses will also be supported as part of the mix of uses, which can help to increase footfall and add to vibrancy and vitality. New town centre uses will also play a critical role in overcoming the socio-economic deprivation experienced in and around the OPDC area by providing a range of new opportunities for employment and training across a breadth of sectors.
		TC2	++	S,M,L-T, I,R,H	OPDC area	As explained in the policy the London Plan Policy 2.15 promotes the designation of new town centres, giving priority to areas with a need for regeneration and better access to services, facilities and employment, which is true for both Old Oak and Park Royal which are identified as Opportunity Areas (Policy 2.13).
		TC2 Option 1	++	S,M,L-T, I,R,H	OPDC area	As explained in the policy the London Plan Policy 2.15 promotes the designation of new town centres, giving priority to areas with a need for regeneration and better access to services, facilities and employment, which is true for both Old Oak and Park Royal which are identified as Opportunity Areas (Policy 2.13). The delivery of a metropolitan centre will help to further deliver this guidance.
		TC2 Option 2	+	S,M,L-T, I,R,H	OPDC area	As explained in the policy the London Plan Policy 2.15 promotes the designation of new town centres, giving priority to areas with a need for regeneration and better access to services, facilities and employment, which is true for both Old Oak and Park Royal which are identified as Opportunity Areas (Policy 2.13). The delivery of a district and neighbourhoods centre may not deliver the same level of benefits as a major centre.
		TC2 Option 3	+	S,M,L-T, I,R,H	OPDC area	As explained in the policy the London Plan Policy 2.15 promotes the designation of new town centres, giving priority to areas with a need for regeneration and better access to services, facilities and employment, which is true for both Old Oak and Park Royal which are identified as Opportunity Areas (Policy 2.13). The delivery of a district and neighbourhoods centre may not deliver the same level of benefits as a major centre.
		TC2 Option 4	+/-	S,M,L-T,I,R,L	OPDC area	This option could see the dispersal of services across Park Royal limiting their access.
		TC3	+	S,M,L-T,I,R,M	OPDC area	The policy promotes vibrancy that can attract inward investment which is a positive for socio-economic wellbeing.
		TC3 Option 1	+/-	S,M,L-T,I,R,M	OPDC area	The option states that the vibrancy will attract investment but the proliferation of these types of business may detract potential investors.
		TC4	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new A Use Class development will help to generate new job and skills development opportunities that will benefit local people.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC4 Option 1	0			The option will not directly contribute to benefits against this objective.
		TC5	++	S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and how this role can help widen the reach of and access to culture, support education skills and careers and enhance the physical environment. The delivery of new cultural, sports and leisure facilities will help to generate new job and skills development opportunities that will benefit local people.
		TC5 Option 1	+	S, M, L-T, D, R, H	OPDC and London wide	The option will offer leisure and sports education in the area.
		TC6	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new visitor accommodation will help to generate new job and skills development opportunities that will benefit local people.
		TC7	+/-	S,M,L-T, I,R,M	OPDC area	Operational hours may have an effect on employment resource required at the venues. A new facility could create employment opportunities for the local people. The policy also ensures proposals would not result in harmful cumulative impacts in association with other late licensed properties leading to loss of employment.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	TC1	++	S,M,L-T, I,R,M	London wide	The policy emphasises London's growing needs and the role that these town centre facilities can play in promoting economic prosperity and maintaining London's status as one of the world's greatest cities.
		TC2	+	S,M,L-T, I,R,H	Nationwide	As explained in the policy the NPPF should consider the impact of the proposal on existing, committed and planned investment in nearby centres within its catchment and the impact of the proposal on the vitality and viability of nearby centres. The NPPF requires local authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes. This options meets this requirement.
		TC2 Option 1	+/-	S,M,L-T, I,R,M	London wide	This option could impact on the vitality and viability of the surrounding town centre hierarchy. It may also dilute investment in other centres and could also impact on a wider catchment and a greater number of town centres in West London. However, Old Oak High Street should see direct investment opportunities which may act as a catalyst for the OPDC area.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TC2 Option 2	+/-	S,M,L-T, D,R,H	OPDC and surrounding areas	There is a significant opportunity for the land uses around the Old Oak Common station to attract interchangers into the surrounding hinterland and to help activate the place and capture economic benefits for the area and its hinterland. This opportunity would be limited through the designation of a Neighbourhood Centre here, rather than a Major Centre.
		TC2 Option 3	+/-	S,M,L-T, D,R,H	OPDC area	Old Oak and the station should see direct investment opportunities which may act as a catalyst for the OPDC area. The designation of a Neighbourhood Centre may limit opportunity.
		TC2 Option 4	+	S,M,L-T, D,R,H	Park Royal	Park Royal should see direct investment opportunities which may act as a catalyst for the OPDC area.
		TC3	+	M, L-T, I, R, L	OPDC area and London wide	The policy could lead to indirect positive effects against this objective, as an improvement to the aesthetics and vibrancy could improve the attractiveness of the town centres to inward investors.
		TC3 Option 1	+/-	M, L-T, I, R, L	OPDC area and London wide	The vibrancy of the location could lead to positive effects against this objective but the proliferation of the use may detract potential investment.
		TC4	+/-	S,M,L-T, I,R,M	OPDC and surrounding areas	The policy states that if you provide too much A-class floorspace, units could remain vacant or the uses could start to draw significant levels of trade away from the surrounding retail hierarchy and existing community. This could have a detrimental effect on the local economy. However, more a-class uses in the town centres will bring investment and incentives for businesses to move into the area.
		TC4 Option 1	+	S,M,L-T, I,R,M	OPDC area	More a-class uses, especially retail, in OPDC will bring investment and incentives for businesses to move into the area.
		TC5	+	S,M,L-T, D,R,M	OPDC and surrounding areas	More facilities may provide inward investment and community benefits for the area.
		TC5 Option 1	+	S,M,L-T, D,R,M	OPDC and surrounding areas	More facilities may provide inward investment and community benefits for the area.
		TC6	+	S,M,L-T, D,R,H	OPDC and surrounding area	More high quality visitor accommodation businesses will attract investment into the area which help create and build sustainable economic growth in the OPDC and surrounding area.
		TC7	++	S,M,L-T, D,R,H	OPDC and surrounding area	The policy supports the role that eating and drinking establishments and culture, sports and leisure uses can play in contributing to the vibrancy and vitality of the OPDC area and adding activity to the public realm and supporting the local economy. The operating

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						hours should benefit the local community and develop economic growth in the area.

Table G-8 Chapter 10: Social Infrastructure

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

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	SI1	+	S-T,I,R,L	OPDC area	The policy seeks to improve social infrastructure and upgrade existing facilities. The scale of development in Old Oak and Park Royal should enhance the built environment in the area.
		SI1 Option 1	+	S, M, L-T, D, R, L	OPDC area	The policy states that new place-making would be enhanced by new social infrastructure delivering a range of community facilities on-site in earlier development phases. However, the early provision may be isolated from existing communities.
		SI2	+	M-T, I, IR, L	OPDC area	The scale of the development and higher education facilities in the area may promote OPDC as an appropriate location and may act as a catalyst for regeneration and creating a greater sense of 'place'.
		SI2 Option 1	0	M-T, I, IR, L	OPDC area	The option does not promote OPDC as an appropriate location for an educational facility and therefore does not recognise this potential catalyst for regeneration and creating a greater sense of 'place'.
		SI3	+	S,M,L-T,D,R,M	OPDC area	The policy seeks to support development in Old Oak and Park Royal as a 'Healthy New Town' which could contribute to enhancing the built environment and encouraging place making.
		SI4	++	S, M, L-T, D, R, M	OPDC area	The policy emphasises the importance of community facilities in place-making specifically in the OPDC area creating key hubs of activity and focal points for the neighbourhood.
		SI5	++	S-T, D, R, M	OPDC area	As a place of social, community focused and entertainment, protection of public houses can be seen as a crucial aspect of maintaining and contributing towards 'place-making'.
		SI5 Option 1	-	S-T, D, R, M	OPDC area	Vacant pubs could be more likely to be lost to other uses if there is no policy to protect their retention for community uses.
2	To optimise the efficient use of land through increased development densities and building heights,	SI1	++	S, M, L-T, D, R, M	OPDC area	The policy promotes the co-location and multifunctionality of social infrastructure which will to make the most efficient use of land and optimise the development of brownfield land, which could have direct significant benefits against this objective.
		SI1 Option 1	++	S, M, L-T, D, R, M	OPDC area	On-site development rather than expanding to surrounding existing facilities may increase building densities.
		SI2	0	N/A	OPDC area	There is no direct link to this IIA Objective.
		SI2	0	N/A	OPDC area	There is no direct link to this IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	where appropriate	*Option 1*				
		SI3	++	S,M,L-T, D,R,M	OPDC area	Co-location of health facilities with other uses will increase development densities.
		SI4	+	S,M,L-T,D,R.L	OPDC area	Co-location of community facilities with other uses will increase development densities.
		SI5	0			This option would not bring any benefits for the objective.
		SI5 Option 1	0			This option would not bring any benefits for the objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	SI1	++	S, M, L-T, D, R, M	OPDC area	The policy objectives enhance existing educational provision and promote co-location which could have direct significant benefits against this objective.
		SI1 Option 1	+	S, M, L-T, D, R, M	OPDC area	Providing new social infrastructure on-site would help meet this objective if the land is previously developed.
		SI2	+	S-T, D,IR,M	OPDC area	The policy seeks to look at existing schools for expansion opportunities as well as securing new sites for schools. These objectives will likely result in re-use of previously developed land and of existing buildings.
		SI2 Option 1	+	S-T, D,IR,M	OPDC area	The option does not promote OPDC as an appropriate location for an educational facility. There is no direct link to this SA Objective.
		SI3	+	S,M,L-T,I,IR,L	OPDC and surrounding area	Colocation of health facilities with other users with prevent the use of greenfield space and increase the use of previously developed land.
		SI4	+	S,M,L-T,I,IR,L	OPDC and surrounding area	Colocation of community facilities with other users with prevent the use of greenfield space and increase the use of previously developed land.
		SI5	+	S,M,L-T,I,R,L	London wide and national	The policy clearly states that National, regional and local planning authorities seek to safeguard valued community assets. This would help maintain the use of these buildings.
		SI5 Option 1	+	S,M,L-T,D,IR,L	OPDC area	This option could lead to the re-use of vacant buildings for other uses, however, these uses may not offer the same benefit in terms of a community asset.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation	SI1	+	L-T, I, R, M	London-wide and national	Development in OPDC and London could provide improved accessibility to new and improved social infrastructure.
		SI1 Option 1	+	S, M, L-T, D, R, L	OPDC area	The policy demonstrates benefits on the transport network as new residents would not have to travel as far to access community uses. However, the early provision may be isolated from existing communities.
		SI2	++	S,M,L-T,D,R,M	OPDC and surrounding area.	The policy seeks to increase the co-location of education services and facilities as part of developments therefore improving accessibility and mitigating impacts on the transport network in the area.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	methods and mitigate impacts on the transport network	*SI2 Option 1*	++	S,M,L-T,D,R,M	OPDC area	The option does not promote OPDC as an appropriate location for an educational facility. There is no direct link to this SA Objective.
		SI3	++	S,M,L-T,	OPDC area	Facilities should be located in designated town centres and close to areas of high public transport access, as well as providing facilities with multiple uses, which would be easily accessible and visible for members of the public.
		SI4	++	S,M,L-T,	OPDC area	OPDC will secure a range of new high quality community facilities that are located at key destination points within the OPDC area, close to destinations of high footfall and high public transport access, leading to benefits against this objective.
		SI5	0			There is no direct relationship between objective and policy.
		SI5 Option 1	0			There is no direct relationship between objective and policy.
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	SI1	0			The policy does not directly affect the objective.
		SI1 Option 1	0			The policy does not directly affect the objective.
		SI2	0			The provision of education does not affect access to housing.
		SI2 Option 1	0			There is no direct relationship between the access to housing objective and the provision of education.
		SI3	0			The policy does not directly affect the objective.
		SI4	0			The policy does not directly affect the objective.
		SI5	0			The use of public houses does not directly support access to different housing types.
		SI5 Option 1	0			There is no direct relationship between objective and policy.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	SI1	+	L-T, I, R, L	OPDC area and surrounding boroughs	High quality design of social infrastructure may enable buildings to adapt to the changing climate including natural ventilation, temperature adaptation and minimise the risk of flooding on site.
		SI1 Option 1	+	L-T, I, R, L	OPDC area and surrounding boroughs	High quality design of social infrastructure may enable buildings to adapt to the changing climate including natural ventilation, temperature adaptation and minimise the risk of flooding on site.
		SI2	0			The choice of land use for education will not have an effect on the objective surrounding climate change issues.
		SI2 Option 1	0			The choice of land use for education will not have an effect on the objective surrounding climate change issues.
		SI3	0			The policy does not directly affect the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		SI4	+	S,M,L-T, I, IR, L	OPDC area	Design measures may include improvements to energy efficiency, which could lead to further benefits against this objective in accordance with Preferred Policy Options for the Environment and Utilities policies.
		SI5	0			There is no direct relationship between objective and policy.
		SI5 Option 1	0		OPDC area	There is no direct relationship between objective and policy.
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	SI1	+	S, M, L-T, I, IR, L	OPDC area and surrounding boroughs	A lesser need to travel to community facilities should reduce carbon emissions and make a contribution to tackling climate change. High quality design could also provide benefits in relation to this objective.
		SI1 Option 1	+	S, M, L-T, I, IR, L	OPDC area and surrounding boroughs	A lesser need to travel to community facilities should reduce carbon emissions and make a contribution to tackling climate change. High quality design could also provide benefits in relation to this objective.
		SI2	+	S, M, L-T, I, IR, L	OPDC area and surrounding boroughs	A lesser need to travel to education facilities should reduce carbon emissions and make a contribution to tackling climate change. High quality design could also provide benefits in relation to this objective.
		SI2 Option 1	0			The policy does not directly affect the objective.
		SI3	+	S,M,L-T, I, IR, L	OPDC area	The provision and co-location of facilities could reduce the need to travel leading to benefits against this objective.
		SI4	+	S,M,L-T, I, IR, L	OPDC area	The provision and co-location of facilities in areas with high footfall and public transport access could reduce the need to travel leading to benefits against this objective. Design measures may include improvements to energy efficiency, which could lead to further benefits against this objective, although these measures are not specified in the policy or supporting text.
		SI5	0			There is no direct relationship between objective and policy.
		SI5 Option 1	0			There is no direct relationship between objective and option.
8	To minimise production of waste across all sectors in the plan area,	SI1	+	S,M,L-T, D, IR, L	OPDC area	High quality design with the selection of sustainable materials for new buildings could contribute to higher recovery rates and minimise the production of waste. The expansion of existing facilities and the use of facilities for multiple uses could create efficiencies in the use of construction resources.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste					*New development should promote the consideration of recycled materials for the construction of the building can help minimise waste as considered in Preferred Policy Options on Waste.*
		SI1 Option 1	0			There is no direct relationship between the policy and the objective surrounding waste minimisation.
		SI2	0			High quality design with the selection of sustainable materials for new buildings could contribute to higher recovery rates and minimise the production of waste. *New development should promote the consideration of recycled materials for the construction of the building can help minimise waste as considered in Preferred Policy Option on Waste.*
		SI2 Option 1	0			There is no direct relationship between the policy and the objective surrounding waste minimisation.
		SI3	0			There is no direct relationship between objective and policy.
		SI4	+	S,M,L-T, D, IR, L	OPDC area	High quality design with the selection of sustainable materials for new buildings could contribute to higher recovery rates and minimise the production of waste. *New development should promote the consideration of recycled materials for the construction of the building can help minimise waste as considered in Preferred Policy Option on Waste.*
		SI5	+	S,M,L-T, D, IR, L	OPDC area	The re-use of vacant pubs could reduce the need for materials in new development.
		SI5 Option 1	+	S,M,L-T, D, IR, L	OPDC area	The re-use of vacant pubs could reduce the need for materials in new development.
9	Improve the quality of the water environment	SI1	0			There is no direct relationship between the option and the objective surrounding the quality of the water environment.
		SI1 Option 1	0			There is no direct relationship between the option and the objective surrounding the quality of the water environment.
		SI2	0			There is no direct relationship between the objective and policy.
		SI2 Option 1	0			There is no direct relationship between the objective and policy.
		SI3	0			There is no direct relationship between objective and policy.
		SI4	0			There is no direct relationship between objective and policy.
		SI5	0			There is no direct relationship between objective and policy.
		SI5	0			There is no direct relationship between objective and policy.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 1				
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	SI1	0			There is no direct relationship between the option and the objective surrounding biodiversity issues.
		SI1 Option 1	0			There is no direct relationship between the option and the objective surrounding biodiversity issues.
		SI2	0			There is no direct relationship between the option and the objective surrounding biodiversity issues.
		SI2 Option 1	0			There is no direct relationship between the option and the objective surrounding biodiversity issues.
		SI3	0	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between objective and policy.
		SI4	0	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between objective and policy.
		SI5	0	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between objective and policy.
		SI5 Option 1	0	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between objective and policy.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	SI1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	High public transport access and the co-location of facilities may minimise air, noise and light pollution through the use of more sustainable modes of transport.
		SI1 Option 1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	High public transport access and the co-location of facilities may minimise air, noise and light pollution through the use of more sustainable modes of transport.
		SI2	+	S, M, L-T, D, IR, L	OPDC area	The policy seeks to increase the co-location of education services and facilities as part of developments therefore improving accessibility and mitigating impacts on the transport network in the area, which could improve pollution impacts
		SI2 Option 1	0	N/A	N/A	There is no direct relationship between objective and policy.
		SI3	+	S, M, L-T, D, IR, L	OPDC area	Facilities should be located in accessible locations as well as providing facilities with multiple uses, which would be easily accessible and visible for members of the public. This could help to reduce potential pollution impacts.
		SI4	+	S,M,L-T,	OPDC area	OPDC will secure a range of new high quality community facilities that are located at key destination points within the OPDC area, close to destinations of high footfall and high

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						public transport access, leading to benefits against this objective.
		SI5	0	S,M,L-T,D,R,L	OPDC area	There is no direct relationship between objective and policy.
		SI5 Option 1	0	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between objective and policy.
12	To conserve and enhance the historic environment, heritage assets and their settings	SI1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The promotion of high quality design could provide some benefits against this objective. *New community uses and the provision of social infrastructure in Old Oak and Park Royal should seek to preserve any historic features and heritage assets in the area as considered in Preferred Policy Option on Heritage.*
		SI1 Option 1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The promotion of high quality design could provide some benefits against this objective. .
		SI2	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The promotion of high quality design could provide some benefits against this objective.
		SI2 Option 1	0			There is no direct relationship between objective and policy.
		SI3	+	S,M,L-T,I,R,M	OPDC area	The promotion of high quality design could provide some benefits against this objective.
		SI4	+	S,M,L-T,D,R,M	OPDC area	The promotion of high quality design could provide some benefits against this objective.
		SI5	++	S-T, D, R, M	London wide	OPDC considers that pubs can act as hubs for community life bringing activity to high streets and can provide heritage value. The preservation of existing and creation of new public houses in Old Oak and Park Royal should seek to preserve any historic features and heritage assets in the area *as considered in Preferred Policy Option on Heritage…*
		SI5 Option 1	+/-	S-T, D, R, M	OPDC area	This policy allows for optimisation of development of sites occupied by public houses. This may have an effect on the historic environment adjacent and surrounding the site, although design measures elsewhere in the Local Plan could seek to reduce this effect.
13	Increase community cohesion and reduce social exclusion to	SI1	++	S, M, L-T, I, R, L	West London and London wide	The policy has the potential to increase community cohesion, unite diverse groups and support the community and welfare through its approach to safeguarding existing infrastructure and creating new community facilities to meet the needs of the local residents and all members of the community and in particular the protected characteristics. Management of the construction process to reduce the impact of a

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	encourage a sense of community and welfare					potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure may have a positive effect on the community
		SI1 Option 1	-	S,M,L-T, D,R,M	OPDC area	This option would not help to knit the residents, diverse groups and employees on early sites with the existing community and may leave these sites feeling isolated in early years.
		SI2	++	S,M,L-T, D, R, H	OPDC area	The policy seeks to promote OPDC as a location for education whilst helping the area and the wider economy. This will have many benefits to the community, increase cohesion, bring diverse groups together and takes into account the increase in population. Physically, the policy should look to improve the quality of the public realm, open spaces and the connectivity to the development as considered in Preferred Policy Options for Design.
		SI2 Option 1	0			The policy does not promote OPDC as a location for education. There is no direct relationship between objective and policy.
		SI3	+	S,M,L-T, D,R,H	OPDC area	The policy seeks to secure adequate health provision. This will have many benefits to the community, increase cohesion, bring diverse groups together and takes into account the increase in population.
		SI4	++	S,M,L-T, D,R,H	OPDC area	The policy seeks to ensure that development in Old Oak and Park Royal is supported by adequate community facilities to cater for all resident groups, such as libraries, places of worship, halls for hire, youth space and training and meeting space. These facilities will increase community cohesion, consider people with a protected characteristic and encourage a sense of welfare.
		SI5	++	S,M,L-T, D,R,H	OPDC area	OPDC considers that pubs can act as hubs for community life. They provide a social space for entertainment purposes and promote community cohesion
		SI5 Option 1	-	S,M,L-T, D,R,M	OPDC area	This option may result in the loss of pubs that provide a valued community facility.
14	Improve safety and reduce crime and the fear of crime	SI1	+	M, L-T, I, R, L	London wide	The provision of social infrastructure and services (i.e. police, fire and health) may help prevent crime and create safer communities.
		SI1 Option 1	+	M, L-T, I, R, L	OPDC area	The provision of community facilities and services may help prevent crime and create safer communities.
		SI2	0			There is no direct relationship between objective and policy.
		SI2 Option 1	0			There is no direct relationship between objective and policy.
		SI3	0			There is no direct relationship between objective and policy.
		SI4	0			There is no direct relationship between objective and policy.
		SI5	0			There is no direct relationship between objective and policy.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		SI5 Option 1	0			There is no direct relationship between objective and policy.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	SI1	++	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The future population in the OPDC area will need to be supported by adequate provision of social infrastructure to meet the requirements of the community. This will also increase the capacity of local social infrastructure. The scale of development in Old Oak and Park Royal provides substantial opportunities to upgrade existing facilities and to provide new state of the art facilities demonstrating best-practice in terms of the provision of social infrastructure. This policy could have benefits for health.
		SI1 Option 1	++	S, M, L-T, I, R, L	OPDC area	Closer healthcare facilities may help reduce inequalities in health and promote healthy living.
		SI2	+	S,M,L-T, D,R,M	OPDC area	Educational facilities could help the health and wellbeing of the community through increased knowledge and accessibility by sustainable modes of transport.
		SI2 Option 1	0			There is no direct relationship between objective and policy.
		SI3	++	S,M,L-T, D,R,L	OPDC and surrounding area.	The future population in the OPDC area will need to be supported by adequate provision of healthcare. Healthcare facilities and social care will protect the health and wellbeing of the local community. As a 'Healthy New Town' there will be an integrated approach to encouraging healthy living.
		SI4	+	S,M,L-T, D,R,M	OPDC area	The policy seeks to deliver community facilities that are collocated where feasible and encourage opportunities for buildings with a shared community use and the co-location of services. This could have benefits for health and wellbeing.
		SI5	+	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC consider that pubs can act as hubs for community life, which is important for mental health and wellbeing. As a 'Healthy New Town' OPDC proposes that the Local Plan looks to protect its public houses, subject to their continuing viability.
		SI5 Option 1	-	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC consider that pubs can act as hubs for community life, which is important for mental health and wellbeing. The loss of such facilities could have negative effects on health.
16	To improve the education and skills levels of all members of the population,	SI1	0			There is no direct relationship between objective and policy.
		SI1 Option 1	+	M, L-T, I, R, L	OPDC area	There is no direct relationship between objective and policy.
		SI2	++	S,M,L-T,	OPDC area	Closer educational facilities within the existing community may increase the availability of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	particularly vulnerable groups			D,R,H		formal education for all age groups and adults from all equality groups.
		SI2 Option 1	+	S,M,L-T, D,R,H	OPDC area	The policy option would not directly promote higher education uses, but does not preclude them so this may not improve employment and skills opportunities.
		SI3	++	S,M,L-T, D,R,H	OPDC area	The policy supports the provision of health facilities. There is no direct relationship between objective and policy.
		SI4	+	S,M,L-T, D,R,L	OPDC area	There is no direct relationship between the objective and the policy.
		SI5	0			There is no direct relationship between the objective and the policy.
		SI5 Option 1	0			There is no direct relationship between the objective and the policy.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	SI1	+	S, M, L-T, I, R, L	OPDC area, West London, London wide	Social Infrastructure may provide access to a range of high quality local employment opportunities and community services.
		SI1 Option 1	++	S, M, L-T, I, R, L	OPDC area	On-site social infrastructure may provide easier access to a range of high quality local employment opportunities and community services.
		SI2	++	S,M,L-T, D,R,H	OPDC area	The opportunity to promote OPDC as a location for new and enhanced education facilities will improve the social wellbeing of the community by providing employment and training opportunities.
		SI2 Option 1	+	S,M,L-T, D,R,L	OPDC area	The policy option would not directly promote higher education uses, but does not preclude them so this may not improve the social wellbeing of the community by providing employment and training opportunities.
		SI3	+	S,M,L-T, D,R,M	OPDC area	Any new healthcare facility will provide an opportunity for local employment during construction or operation of the development.
		SI4	+	S,M,L-T, D,R,M	OPDC area	Any new community facility will provide an opportunity for local employment during construction or operation of the development
		SI5	+	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC considers that pubs can act as hubs for community life and provide economic benefits by providing jobs.
		SI5 Option 1	-			This policy could result in the loss in viable existing businesses.
18	To encourage inward investment alongside investment	SI1	+	M, L-T, I, R, L	OPDC area, West London, London wide	An increase in social infrastructure will increase infrastructure and utilities capacity which may contribute to the community and inward investment with a greater flow of businesses moving into the area.
		SI1 Option 1	+	M, L-T, I, R, L	OPDC area	An increase in social infrastructure will increase infrastructure and utilities capacity which may contribute to the community and inward investment with a greater flow of businesses

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	within existing communities, to create sustainable economic growth					moving into the area.
		SI2	+	S,M,L-T, D,R,M	OPDC area	An education facility in the OPDC will encourage further investment as the OPDC will be seen as a desirable location for business and academia.
		SI2 Option 1	+	S,M,L-T, D,R,M	OPDC area	An education facility in the OPDC will encourage further investment as the OPDC will be seen as a desirable location for business and academia.
		SI3	+	L-T, I, IR, M	OPDC area	National and International health institutions in the OPDC area could encourage further inward investment from associated sectors.
		SI4	++	S,M,L-T, D,R,H	OPDC area	An increase in community facilities may contribute to the community and inward investment due to their ability to provide jobs and attract footfall into an area.
		SI5	++	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC consider that pubs can act as hubs for community life. They provide economic benefits by providing jobs, supporting local food suppliers and bring activity to high streets. Public houses must be seen as a viable business.
		SI5 Option 1	-	S,M,L-T, D,R,L	OPDC area	This policy could result in the loss in viable existing businesses.

Table G-9 Chapter 11: Transport

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

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	T1	+	S,M,L- T,I,R,M	OPDC area	The policy seeks to deliver state of the art, safe and accessible transport systems, by providing infrastructure that connects communities and helps facilitate growth and this would support accessibility and would help to encourage place making.
		T1 Option 1	-	S,M,L- T,I,R,L	OPDC area	The policy seeks to give priority to car travel which would result in effects to vehicle congestion, people making fewer journeys by foot and other sustainable means including cycling and public transport and this would impact upon health and wellbeing and which could negatively impact upon local amenity.
		T2	+	S,M,L- T,I,R,M	OPDC and surrounding area	Walking is the most sustainable form of transport and encouraging increased walking will have many advantages including more connected neighbourhoods. Increasing the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal would all support placemaking.
		T3	+	S,M,L- T,I,R,M	OPDC and surrounding area	Placemaking would be encouraged through the provision of state of the art cycling infrastructure, improved cycle wayfinding and signage and the enhancement of existing cycle connections to ensure they are safe, convenient, direct but not detrimental to pedestrians.
		T4	+	S,M,L- T,I,R,M	OPDC and surrounding area	The policy seeks to support a number of rail improvements including the delivery of state of the art rail station at Old Oak Common and at links between stations as well as improved services on existing rail infrastructure these features would all contribute towards enhancing the built environment and improving accessibility.
		T5	+	S,M,L- T,I,R,L	OPDC and surrounding area	The policy seeks the delivery of increased bus frequencies on existing and extended bus routes; to provide bus journey time reliability and to provide clear and legible signage. This would help to encourage placemaking.
		T6	+	S,M,L-	OPDC and	The policy seeks to deliver high quality streets that integrate effectively with the wider

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T,I,R,M	surrounding area	public realm which would help to support placemaking.
		T7	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks to promote modal shift towards more sustainable modes. This would help to support the street scene, public realm and placemaking.
		T7 Option 1	-	S,M,L-T,I,R,L	OPDC area	Setting less stringent car parking standards would offer greater choice however would place unacceptable impacts on the surrounding road network and would discourage modal shift towards the use of more sustainable transport odes and would increase emissions. This would potentially lead to more congestion and would not support placemaking.
		T7 Option 2	+	S,M,L-T,I,R,L	OPDC and surrounding area	This policy, similarly to the preferred option, would enable a mode shift towards the use of sustainable transport and reduce traffic flow and congestion through limited parking which would support the street scene, public realm and placemaking.
		T8	0	N/A	N/A	The policy primarily addresses freight, servicing and deliveries and does not have a direct link to the SA Objective.
		T8 Option 1	0	N/A	N/A	The nature of the policy does not directly link with the SA Objective.
		T8 Option 2	0	N/A	N/A	The nature of the policy does not directly link with the SA Objective.
		T9	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks to provide support to reduce freight and construction trips which may have an indirect effect on amenity through reduced frequency of heavy goods vehicles (HGVs) on roads.
		T9 Option 1	+	S,M,L-T,I,R,L	OPDC area	A lack of coordination over construction transport could lead to increased volumes of construction vehicles on the road network which could have an effect on amenity.
		T9 Option 2	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks to move all freight moved by rail or water which could have a positive effect on amenity.
		T10	0	N/A	N/A	The policy primarily addresses transport assessments and travel plans and does not have a direct link to the SA Objective.
		T10 Option 1	0	N/A	N/A	There is no link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T10 Option 2	0	N/A	N/A	There is no link between the policy and the SA Objective.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	T1	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy primarily seeks to provide transport infrastructure and to facilitate growth and the development of state of the art infrastructure could help to optimise efficient use of land.
		T1 Option 1	0	N/A	N/A	The primary focus of the policy is to give priority to car travel which directly link with efficient land use.
		T2	+	S,M,L-T,I,R,L	OPDC and surrounding area	The efficient use of land would be demonstrated through the provision of high quality, safe and accessible walking networks.
		T3	+	S,M,L-T,I,R,L	OPDC and surrounding area	The provision of state of the art cycling infrastructure through this policy would contribute towards optimising efficient land use.
		T4	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T5	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T6	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T7	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T7 Option 1	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T7 Option 2	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T8	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy supports freight, servicing and deliveries and it seeks to identify potential sites for consolidation centres and lorry holding areas and the provision of facilities for home deliveries within residential development. The delivery of facilities for home deliveries within residential development would help to optimise the efficient use of land.
		T8 Option 1	0	N/A	N/A	The policy option seeks no controls over deliveries and servicing which does not have direct link to the SA Objective.
		T8 Option	0	N/A	N/A	The policy option seeks to ban deliveries and servicing by larger vehicles which does not have direct link to the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		2				
		T9	0	N/A	N/A	The policy focuses on reducing freight and construction trips which does not directly link with the SA Objective.
		T9 Option 1	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T9 Option 2	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T10	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T10 Option 1	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
		T10 Option 2	0	N/A	N/A	There is no direct link between the primary focus of the policy and the SA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	T1	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy primarily seeks to provide transport infrastructure and to facilitate growth and the development of state of the art infrastructure could help to optimise reuse of previously developed land.
		T1 Option 1	0			The primary focus of the option is to give priority to car travel which does not directly link with use of previously developed land.
		T2	+	S,M,L-T,I,R,L	OPDC and surrounding area	As a sustainable form of travel, walking routes and infrastructure will be more likely to be in place in previously developed areas therefore encouraging brownfield development.
		T3	+	S,M,L-T,I,R,L	OPDC and surrounding area	As a sustainable form of travel, cycle routes and infrastructure will be more likely to be in place in previously developed areas therefore encouraging brownfield development.
		T4	0			There is no direct link between the primary focus of the policy and the objective.
		T5	0			There is no direct link between the primary focus of the policy and the objective.
		T6	+	S,M,L-T,D,R,M	OPDC and surrounding area	The strategic road network, particularly the A40 and A406, is vital to the successful operation of Park Royal and will be in the future to Old Oak. Road schemes should contribute to strategic land remediation.
		T7	0			There is no direct link between the primary focus of the policy and the objective.
		T7	0			There is no direct link between the primary focus of the policy and the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 1				
		T7 Option 2	0			There is no direct link between the primary focus of the policy and the objective.
		T8	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy supports freight, servicing and deliveries and it seeks to identify potential sites for consolidation centres and lorry holding areas and the provision of facilities for home deliveries within residential development. The delivery of facilities for home deliveries within residential development would help to optimise the efficient use of land.
		T8 Option 1	0			This option seeks no controls over deliveries and servicing which does not have direct link to the objective.
		T8 Option 2	0			This option seeks to ban deliveries and servicing by larger vehicles which does not have direct link to the objective.
		T9	0			The policy focuses on reducing freight and construction trips which does not directly link with the objective.
		T9 Option 1	0			There is no direct link between the primary focus of the policy and the objective.
		T9 Option 2	0			There is no direct link between the primary focus of the policy and the objective.
		T10	0			There is no direct link between the primary focus of the policy and the objective.
		T10 Option 1	0			There is no direct link between the primary focus of the policy and the objective.
		T10 Option 2	0			There is no direct link between the primary focus of the policy and the objective.
4	Minimise the need to travel, improve accessibility	T1	++	S,M,L-T, D, R, H	OPDC and surrounding area	The policy seeks to deliver state of the art, safe and accessible transport systems by providing infrastructure that connects communities and facilitates growth. It also seeks to prioritise sustainable transport modes and support modal shift from private cars all of which would directly support the SA Objective.

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	for all users by public and non-motorised transportation methods and mitigate impacts on the transport network					
		T1 Option 1	+/-	S,M,L-T,D,R,M	OPDC and surrounding area	This policy gives priority to car travel above sustainable modes which could impact upon journey times through increased vehicle congestion though the policy may benefit some businesses and residents. However, by facilitating the use of private vehicles congestion, noise and emissions would increase and fewer people would make journeys by foot, bike or public transport.
		T2	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy seeks to support walking through the provision of high quality, safe and accessible walking networks. This would help to minimise the need to travel through improving accessibility by walking.
		T3	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy seeks to support and encourage cycling through the provision of state of the art infrastructure and enhanced connections which would help to minimise the need to travel through improving accessibility by cycling.
		T4	++	S,M,L-T,D,R,H	OPDC and surrounding area	The policy would deliver a new state of the art rail station at Old Oak and would provide quality links between stations as well as improving services on existing infrastructure all of which would directly serve to improve accessibility. The delivery of two new overground stations would also help to manage capacity.
		T5	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy would deliver and contribute to the delivery of infrastructure to improve bus journey time reliability and priority measures as well as improved bus frequencies on new and extended routes which would help to improve accessibility.
		T6	+	S,M,L-T,D,R,M	OPDC area	The policy primarily seeks to provide roads and streets that overcome severance and optimise connectivity. It also seeks to ensure that streets give priority to pedestrians, cyclists and buses which would improve accessibility.
		T7	+	S,M,L-T,D,R,M	OPDC area	The policy primarily seeks to promote modal shift towards more sustainable modes through car parking limitations. This may contribute to minimising the need to travel and limited car parking in areas may also lead to increased use of sustainable transport modes such as public transport.
		T7 Option 1	-	S,M,L-T,D,R,M	OPDC area	The policy seeks to set less stringent car parking standards which could discourage the use of more sustainable transport modes.
		T7 Option 2	+	S,M,L-T,D,R,M	OPDC area	The car free approach would enable a mode shift towards the use of more sustainable transport modes which would have a positive effect on accessibility across non-motorised transportation methods.
		T8	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy addresses freight, servicing and deliveries and does not directly link to minimising the need to travel and improving improve accessibility for all users.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T8 Option 1	0	N/A	N/A	The primary focus of the policy does not have a direct link to the SA Objective.
		T8 Option 2	0	N/A	N/A	The primary focus of the policy does not have a direct link to the SA Objective.
		T9	+	S,M,L-T,D, I, R M	OPDC and surrounding area	The policy seeks to provide for measures to reduce freight and construction trips, make use of rail and water transportation and to coordinate and phase construction projects to enable effective mitigation of transport impacts all of which would help to mitigate impacts on the transport network.
		T9 Option 1	-	S,M,L-T,D,R,M	OPDC area	No control or coordination of construction transport would lead to high volumes of construction vehicles on the road network which would put a strain on the transport network.
		T9 Option 2	+	S,M,L-T,D, I, R M	OPDC and surrounding area	The policy would have improved impacts upon the transport network compared to Option 1.
		T10	+	S,M,L-T,D,I,R,M	OPDC and surrounding area	Transport assessments and travel plans will help to deliver sustainable transport objectives and will seek to address congestion and impacts upon bus routes and on the primary route network and will ultimately support the mitigation of impacts upon the transport network.
		T10 Option 1	+	S,M,L-T,D,I,R,M	OPDC and surrounding area	Requiring a transport assessment for all development would enable more control over cumulative impacts of developments on the transport network which would support the mitigation of impacts on the transport network.
		T10 Option 2	-	S,M,L-T,D,I,R,M	OPDC and surrounding area	Increasing the threshold for schemes that require a transport assessment could lead to a congested road network.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types	T1	?			The significant general background growth and the increase in travel demand resulting from additional homes within the development area will add to the existing travel demand, both at the strategic and local level. The policy may have an indirect effect on the range of housing types in the local area.
		T1 Option 1	?			This option support for the use of car travel may benefit the local residents.
		T2	+	S,M,L-T,D,R,L	OPDC area	Redevelopment presents an opportunity to enhance existing and provide new pedestrian environments across Old Oak and Park Royal. High quality pedestrian

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	and tenures, to meet identified local needs					walking routes to Old Oak Common station from all areas will be vital to ensure residents can benefit from this new transport superhub. This should improve access to housing developments through sustainable travel.
		T3	+	S,M,L-T,D,R,L	OPDC area	Private cycle parking for residents and provision for visitors should meet local needs and encourage cycling. Adequate cycle storage and infrastructure may increase the suitability of homes for potential residents.
		T4	+	S,M,L-T,I,R,L	OPDC area and London wide	High quality rail infrastructure and a frequent rail service may help meet local needs. HS2 and Crossrail could benefit the area and support sustainable travel to surrounding residential areas.
		T5	+	S,M,L-T,D,R,L	OPDC area	Increased bus services and frequencies would provide improved connections to homes in Old Oak and Park Royal reducing dependence on the private car. This policy may have an indirect effect on housing locations.
		T6	?			A high quality road network could contribute to the provision of a variety of homes in the area.
		T7	+	S,M,L-T,D,R,H	OPDC area	The policy seeks to control the level of parking. In Old Oak, limiting car parking to 0.2 spaces for residential developments, promotion of car free development close to public transport hubs and securing zero car parking for non-residential developments. In Park Royal, limiting car parking to 0.2 spaces for residential developments and allowing limited car parking for non-residential development taking into account access to public transport and operational or business needs. Limited car parking should encourage sustainable travel and provide greater flexibility in improving access and providing different types of homes.
		T7 Option 1	?			This option would offer greater choice. However, this is likely to place unacceptable impacts on the surrounding road network, discourage a mode shift towards the use of more sustainable transport modes and effect access to housing developments.
		T7 Option 2	+/-	S,M L-T,D,R,H	OPDC area	This option would enable a mode shift towards the use of more sustainable transport modes and would reduce traffic flow and congestion. This should have a positive effect on access to housing developments.
		T8	+	S,M L-T,I,R,M	OPDC area	OPDC will work collaboratively with stakeholders to ensure that freight movements are conducted in a safe, efficient and sustainable manner by encouraging the provision of facilities for home deliveries within residential developments. This will require sufficient access to housing areas.
		T8 Option	0			There is no direct link between the primary focus of the policy and the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		1				
		T8 Option 2	0			There is no direct link between the primary focus of the policy and the objective.
		T9	0			There is no direct link between the primary focus of the policy and the objective. However, a Construction Logistics Strategy will be developed by TfL and OPDC to ensure a coordinated approach which will minimise the disruption to surrounding residents.
		T9 Option 1	0			There is no direct link between the primary focus of the option and the objective.
		T9 Option 2	0			There is no direct link between the primary focus of the option and the objective.
		T10	?			Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance. This requirement may indirectly affect housing provision, access and locations.
		T10 Option 1	0			There is no direct link between the primary focus of the policy and the objective.
		T10 Option 2	0			There is no direct link between the primary focus of the policy and the objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the	T1	+	S,M,L-T,D,I,R,M	OPDC area	The delivery of state of the art road infrastructure could include the provision for Sustainable Urban Drainage Systems (SuDS) which would contribute towards climate change adaptation and minimising flood risk.
		T1 Option 1	0	N/A	N/A	Giving priority to car travel does not directly link to minimising flood risk.
		T2	+	S,M,L-T,D,I,R,M	OPDC area	The policy primarily focuses on supporting walking networks and connectivity and the provision of SuDS within walking infrastructure could contribute towards achieving the SA Objective.
		T3	0	N/A	N/A	The policy primarily focuses on supporting and encouraging cycling which would help

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	heat island effect					to encourage more people to cycle however would not have a direct effect in achieving the SA Objective.
		T4	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation could be achieved through provisions including a state of the art rail links and a state of the art rail station at old common as well as future proofing station design to enable smart technology to be implemented.
		T5	0	N/A	N/A	The policy primarily focuses on delivery and contributions to bus improvements and infrastructure for buses and has no direct link to the SA Objective though it is noted that provisions for roads in connection with the policy could contribute towards achieving the SA Objective.
		T6	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation and flood minimisation would be supported through the provision of high quality roads with robust and coordinated materials.
		T7	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to ensure that development is an exemplar of low carbon development and it seeks to promote a modal shift towards more sustainable modes by imposing car parking limits which will help to support climate change adaptation.
		T7 Option 1	0	N/A	N/A	The policy focuses setting less stringent car parking standards which does not directly link with flood risk minimisation.
		T7 Option 2	0	N/A	N/A	The policy encourages a shift to sustainable transport use however this does not directly link with flood risk minimisation.
		T8	0	N/A	N/A	The policy does not directly link with the SA Objective.
		T8 Option 1	0	N/A	N/A	The policy does not directly link with the SA Objective.
		T8 Option 2	0	N/A	N/A	Banning deliveries and servicing by larger vehicles would help to reduce local congestion however would have a limited effect in supporting climate change and flood risk minimisation.
		T9	0	N/A	N/A	The policy does not directly link with the SA Objective.
		T9 Option 1	0	N/A	N/A	The policy does not directly link with the SA Objective.
		T9 Option 2	0	N/A	N/A	The policy does not directly link with the SA Objective.
		T10	0	N/A	N/A	The policy does not directly link with the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T10 Option 1	0	N/A	N/A	The policy does not directly link with the SA Objective.
		T10 Option 2	0	N/A	N/A	The policy does not directly link with the SA Objective.
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	T1	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to deliver state of the art road infrastructure and to prioritise sustainable transport modes and to support modal shift from private cars which would support adaptation to climate change.
		T1 Option 1	-	S,M,L-T,D,I,R,M	OPDC area	Giving priority to car travel would go against the climate change adaptation initiative and would facilitate the use of private vehicles, would increase congestion and lead to increased emissions.
		T2	+	S,M,L-T,D,I,R,M	OPDC area	The policy primarily focuses on supporting walking networks and connectivity which would help to support the increase of journeys made by non-motorised transport and would contribute towards achieving the SA Objective.
		T3	+	S,M,L-T,D,I,R,M	OPDC area	The policy primarily focuses on supporting and encouraging cycling which would help to encourage more people to cycle helping to increase non-motorised journeys and may help to reduce car reliance and emissions which would support climate change adaptation.
		T4	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation could be achieved through provisions including a state of the art rail links and a state of the art rail station at old common helping to increase energy efficiency. Future proofing station design would also enable smart technology to be implemented.
		T5	0	N/A	N/A	The policy primarily focuses on delivery and contributions to bus improvements and infrastructure for buses and has no direct link to the SA Objective.
		T6	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation would be supported through the provision of high quality roads with robust and coordinated materials. The policy also seeks to mitigate impacts of development on surrounding local and strategic road networks as well as ensuring that streets prioritise pedestrians, cyclists and buses which would help to encourage sustainable movements.
		T7	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to ensure that development is an exemplar of low carbon development and it seeks to promote a modal shift towards more sustainable modes by imposing car parking limits which will help to support climate change adaptation. The policy also seeks to incorporate electric charging points for electric vehicles at all new parking spaces which would help to promote and encourage the use of electric

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						cars, further supporting the SA Objective.
		T7 Option 1	-	S,M,L-T,D,I,R,M	OPDC area	The policy focuses setting less stringent car parking standards which could discourages a mode shift towards more sustainable modes and would impact upon the surrounding road network and would also lead to increased emissions.
		T7 Option 2	+	S,M,L-T,D,I,R,M	OPDC area	The policy encourages a shift to sustainable transport use which would help to reduce traffic and contribute to reducing emissions which would support climate change adaptation.
		T8	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to identify more efficient and sustainable ways of delivering goods including the use of cargo bikes as well as seeking to ensure that operators of all freight vehicles have attained the Gold Fleet Operator Recognition Scheme (FORS) accreditation demonstrating efforts to reduce emissions all of which supports climate change adaptation.
		T8 Option 1	-	S,M,L-T,D,I,R,M	OPDC area	The policy would not place controls over deliveries and servicing which would mean that the flow of HGVs and LGVs would increase drastically, exacerbating congestion issues and resulting in negative environmental impacts including increased emissions.
		T8 Option 2	0	N/A	N/A	Banning deliveries and servicing by larger vehicles would help to reduce local congestion however would have a limited effect in supporting climate change mitigation and adaptation.
		T9	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to reduce freight and construction trips and to make maximum use of rail and water transport for construction and freight which would help to support reducing transportation by road.
		T9 Option 1	-	S,M,L-T,D,I,R,M	OPDC area	The policy states that there would be no control or coordination of construction transport which could lead to high volumes of construction vehicles on the road network increasing congestion and contributing to increased emissions.
		T9 Option 2	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to make transport all freight by rail or water which would reduce transportation by road and help to reduce impacts to the road network and emissions.
		T10	+	M,L-T,D,I,R,M	OPDC area	Travel plans provide a long term strategy to deliver sustainable transport objectives through an action plan and would ultimately contribute towards increasing energy efficiency, reducing congestion and emissions.
		T10 Option 1	+	M,L-T,D,I,R,M	OPDC area	Requiring a transport assessment for all development would help to reduce impacts on the road network and emissions.
		T10 Option	-	M,L-T,D,I,R,M	OPDC area	Increasing the threshold for schemes that require a transport assessment could lead to a congested road network which could lead to increased emissions.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		2				
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	T1	+	M,L-T,D,I,R,M	OPDC area	The policy seeks to deliver state of the art transport systems and has no direct link to the SA Objective.
		T1 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T3	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T4	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T5	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T6	?	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to deliver high quality streets with robust and coordinated materials and has the potential to partially support the SA Objective through the use of recycled materials for infrastructure.
		T7	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T7 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T7 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T8	+	S,M,L-T,D,I,R,M	OPDC area	The policy explains rail freight activity within the wider Park Royal area utilising the Great Western Main Line and West Coast Main Line routes (including at various sites around Willesden such as the Euro Freight Terminal) which handle inbound flows of aggregates and cement and outbound flows of waste and scrap metal. The policy would contribute to the SA through maximising transportation of waste by making less trips and potential segregation of waste types.
		T8 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T8 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T9	++	S,M,L-T,D,R,H	OPDC area	The policy addresses freight and construction transport may enable benefits through minimisation techniques. Maximum re-use and recycling of waste and construction materials within the area will reduce transport demands. For residual movements, there

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						is potential for bulk construction materials and/or waste to be transported by rail and canal although issues of local environmental impact and commercial viability will need to be addressed.
		T9 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T9 Option 2	0	N/A	N/A	The primary focus of the policy is the movement of freight by rail or water and has no direct link to the SA Objective.
		T10	+	S,M,L-T,D,R,M	OPDC area	Transport assessments and travel plans would enable sustainable objectives which could include efficient transportation of waste materials from development sites which would partially support the SA Objective.
		T10 Option 1	+	S,M,L-T,D,R,M	OPDC area	Requiring a transport assessment for all development would enable more scrutiny over developments to ensure best practice compliance which would also likely include efficient waste transportation.
		T10 Option 2	-	S,M,L-T,D,R,M	OPDC area	Increasing the threshold for schemes requiring a transport assessment contrary to the preferred option may result in efficient transportation techniques for waste not being explored.
9	Improve the quality of the water environment	T1	+	S,M,L-T,I,R,L	OPDC area	The delivery of state of the art road infrastructure could include the provision for SuDS which would contribute towards improving the quality of the water environment.
		T1 Option 1	0	N/A	N/A	The policy seeks to give priority to car travel and has no direct link to the SA Objective.
		T2	+	S,M,L-T,I,R,L	OPDC area	The policy primarily focuses on supporting walking networks and connectivity and the provision of SuDS within walking infrastructure could contribute towards achieving the SA Objective.
		T3	0	N/A	N/A	The policy primarily focuses on supporting and encouraging cycling and has no direct link to the SA Objective.
		T4	+	M,L-T,I,R,L	OPDC area	The provision of state of the art rail links and a state of the art rail station at old common could help to support the SA Objective through incorporating SuDS into design.
		T5	0	N/A	N/A	The policy primarily focuses on delivery and contributions to bus improvements and infrastructure for buses and has no direct link to the SA Objective though it is noted that provisions for roads in connection with the policy could contribute towards achieving the SA Objective.

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		T6	+	S,M,L-T,I,R,L	OPDC area	The provision of high quality roads with robust and coordinated materials would support the SA Objective through incorporating SuDS into design.
		T7	0	N/A	N/A	The policy primarily focuses on car parking provision and has no direct link to the SA Objective.
		T7 Option 1	0	N/A	N/A	The policy focuses setting less stringent car parking standards and has no direct link to the SA Objective.
		T7 Option 2	0	N/A	N/A	The policy focuses on having residential parking and has no direct link to the SA Objective.
		T8	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T8 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T8 Option 2	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T9	-	S,M,L-T,D,R,M	OPDC area	The policy seeks to make maximum use of rail and water transport for construction and freight. Transportation for construction and freight across water has the potential to result in pollution of the water environment if not adequately mitigated. *Appropriate pollution prevention would need to be considered where water transportation is concerned.*
		T9 Option 1	0	N/A	N/A	The policy states that there would be no control or coordination of construction transport which could lead to high volumes of construction vehicles on the road network however there would be no direct link to improving the water environment.
		T9 Option 2	-	S,M,L-T,D,R,M	OPDC area	The policy seeks to make transport all freight by rail or water which would have more of a potential negative effect upon the water environment than the preferred option. *Appropriate pollution prevention would need to be considered where water transportation is concerned.*
		T10	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T10 Option 1	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.
		T10 Option	0	N/A	N/A	The primary focus of the policy has no direct link to the SA Objective.

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		2				
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	T1	+	S,M,L-T,D,R,M	OPDC and London wide	The policy would not have any significant effects for the objective. Promoting sustainable transport over cars could benefit biodiversity by reducing emissions, run-off and noise. Whilst there is benefits in areas close to the LNR, in general biodiversity levels in the area are limited due to existing uses and the wider development proposals so the benefits of this may not be significant.
		T1 Option 1	-	S,M,L-T,D,R,M	OPDC and London wide	The option would be detrimental to biodiversity due to the encouragement of car travel and associated increase in emissions and disturbance effects.
		T2	+	S,M,L-T,D,R,M	OPDC and London wide	This policy offers opportunities to tie in walking routes with GI and improve wildlife connectivity
		T3	+	S,M,L-T,D,R,M	OPDC and London wide	This policy offers opportunities to tie in cycling routes with GI and improve wildlife connectivity
		T4	+/-	S,M,L-T,D,R,M	OPDC and London wide	Whilst the construction of new stations and infrastructure may adversely affect biodiversity present, this is unknown at this stage. New stations could include planting schemes and biodiversity enhancements.
		T5	0			The policy would not have any significant effects for the objective.
		T6	?			The value of the policy to the objective would be uncertain but new streets, if allied with suitable green infrastructure provision may act as green corridors.
		T7	0			The policy would not have any significant effects for the objective.
		T7 Option 1	0			The option would not have any significant effects for the objective.
		T7 Option 2	0			The option would not have any significant effects for the objective.
		T8	0			The policy would not have any significant effects for the objective.
		T8 Option 1	0			The option would not have any significant effects for the objective.
		T8 Option 2	0			The option would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T9 Option 1	0			The option would not have any significant effects for the objective.
		T9 Option 2	0			The option would not have any significant effects for the objective.
		T10	0			The policy would not have any significant effects for the objective.
		T10 Option 1	0			The option would not have any significant effects for the objective.
		T10 Option 2	0			The option would not have any significant effects for the objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	T1	++	M,L-T,D,R,M	OPDC area and London wide	The policy explains that an uptake of low carbon vehicle technologies and fuels, lower emission buses, taxis and HGVs and infrastructure to support electric vehicles will facilitate significant reductions in CO_2 and NO_x emissions across all modes and contribute towards a cleaner and healthier development area.
		T1 Option 1	-	M,L-T,D,R,M	OPDC area	However, by facilitating the use of private vehicles congestion, noise and emissions would increase and fewer people would make journeys by foot, bike or public transport.
		T2	+	M,L-T,D,R,M	OPDC area	The policy would benefit the minimisation of pollution as walking provides an alternative to the private car.
		T3	+	M,L-T,D,R,M	OPDC area	The policy would benefit the minimisation of pollution as cycling provides an alternative to the private car.
		T4	0			The policy would not have any significant effects for the objective.
		T5	+/-	S,M,L-T,D,R,L	OPDC area	The policy would not have any significant effects for the objective. The policy would benefit the minimisation of pollution as buses provide a sustainable alternative to the private car However, buses can cause pollution. *Recommendation to encourage use of low carbon buses and work with TfL.*
		T6	+/-	S,M,L-T,D,R,L	OPDC area	The policy would not have any significant effects for the objective. However, new streets may bring pollution closer to residents in those areas, or it may help relieve congestion elsewhere and hence have benefits.
		T7	+	S,M,L-	OPDC area	OPDC will ensure the development area is an exemplar of low carbon development

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T,D,R,M		and will promote a modal shift towards more sustainable modes. This will have a positive effect on pollution levels. Limiting spaces will deter people from using cars and provides charging points to encourage electric vehicles.
		T7 Option 1	-	S,M,L- T,I,R,M	OPDC and surrounding area	Less stringent car parking standards may encourage private car use therefore increasing pollution levels.
		T7 Option 2	+	S,M,L- T,I,R,M	OPDC and surrounding area	This option would enable a mode shift towards the use of more sustainable transport modes reducing traffic flow and congestion. This could have a positive effect on pollution levels.
		T8	+/-	S,M,L- T,D,R,H	OPDC and surrounding area	The significant HGV activity in the development area can have negative impacts on the environment in terms of noise and air quality and causes congestion, particularly on Scrubs Lane. However, there is an attempt to limit and control the congestion.
		T8 Option 1	--	S,M,L- T,D,R,M	London wide	If no measures are put in place to control servicing and deliveries, HGVs and LGVs flow would increase drastically, exacerbating the congestion issues in the development area, as well as having noise and environmental impacts, affecting the public realm and using up road space.
		T8 Option 2	+	S,M,L- T,I,R,M	OPDC and surrounding area	This option would ban the larger vehicles, thereby, potentially reducing congestion and pollution levels.
		T9	+/-	S,M,L- T,D,R,M	London wide	Construction traffic will increase the volume of HGVs and other construction vehicles on the local and strategic road network and may increase pollution levels. However, the freight consolidation centre described in policy T8 could be used to reduce the number of construction vehicles required and the number of construction vehicle movements on the road network. Maximum re-use and recycling of waste and construction materials within the area will reduce transport demands.
		T9 Option 1	-	S,M,L- T,D,R,M	London wide	The option to programme construction works without any coordination with other projects would lead to very high volumes of construction vehicles on the road network which would also have noise pollution implications.
		T9 Option 2	+	S,M,L- T,D,R,M	London wide	This option would reduce the impacts of construction on the road network due to the alternative use of rail or water for all freight. This would have a positive effect on minimising noise.
		T10	+	S,M,L- T,D,R,M	London wide	Transport Statement or Transport Assessment which assesses the extent to which the development will support opportunities for sustainable travel that should minimise air, noise and light pollution.
		T10	+	S,M,L-	London wide	This option would enable more scrutiny over developments to ensure they comply with

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 1		T,D,R,M		best practice. In addition it would enable more control over the cumulative impact of developments on the transport network. More control over development and the network should help to reduce carbon emissions and subsequently minimise pollution from private vehicles.
		T10 Option 2	?			If the threshold was increased developments could be planned without assessing the impact of the development on the transport system. This could have a detrimental effect on pollution levels.
12	To conserve and enhance the historic environment, heritage assets and their settings	T1	+	S,M,L-T,I,R,M	OPDC area	Fewer cars will cause less disturbance and pollution which could affect heritage assets or their settings.
		T1 Option 1	-	S,M,L-T,I,R,M	OPDC area	The option would cause more cars which will cause more disturbance and pollution, which in turn could affect heritage assets or their setting.
		T2	+	S,M,L-T,I,R,M	OPDC area	Fewer cars will cause less disturbance and pollution which could affect heritage assets or their settings.
		T3	+	S,M,L-T,I,R,M	OPDC area	Fewer cars will cause less disturbance and pollution which could affect heritage assets or their settings.
		T4	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy would not have any significant effects for the objective. However, a focus on really high quality design should complement any existing heritage assets.
		T5	0			The policy would not have any significant effects for the objective.
		T6	?			The policy may not have any significant effects for the objective although it depends on the relative location of heritage assets.
		T7	0			The policy would not have any significant effects for the objective.
		T7 Option 1	0			The option would not have any significant effects for the objective.
		T7 Option 2	0			The option would not have any significant effects for the objective.
		T8	?			The policy may not have any significant effects for the objective although it depends on the relative location of heritage assets.
		T8 Option 1	0			The option would not have any significant effects for the objective.
		T8	0			The option would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 2				
		T9	?			Although construction work is short-term and temporary, it can affect heritage assets via direct physical disturbance and noise for example.
		T9 Option 1	-	S,M,L-T,I,R,L	OPDC and surrounding area	Options that place strict controls have better chance of preserving the historic environment and heritage assets.
		T9 Option 2	0			The option would not have any significant effects for the objective.
		T10	0			The policy would not have any significant effects for the objective.
		T10 Option 1	0			The option would not have any significant effects for the objective.
		T10 Option 2	0			The option would not have any significant effects for the objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	T1	+	S,M-T,D,R,H	OPDC and surrounding area	Measures that encourage safe, accessible transport can help community cohesion. *A recommendation would be to ensure that the needs to vulnerable and wider diversity groups are factored in to all places as different groups can have different needs*
		T1 Option 1	-	S,M-T,D,R,H	OPDC and surrounding area	The priority to car travel in this option will create added congestion causing community severance.
		T2	+	S,M-T,D,R,H	OPDC and surrounding area	Measures that encourage safe, accessible transport can help community cohesion. *A recommendation would be to ensure that the needs to vulnerable and wider diversity groups are factored in to all places as different groups can have different needs*
		T3	+	S,M-T,D,R,H	OPDC and surrounding area	Measures that encourage safe, accessible transport can help community cohesion. *A recommendation would be to ensure that the needs to vulnerable and wider diversity groups are factored in to all places as different groups can have different needs*
		T4	+	S,M-T,D,R,H	OPDC and surrounding	The policy promotes sustainable transport and hubs like this can benefit communities by providing a central focus, encouraging sustainable movement.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					area	
		T5	++	S,M-T,D,R,H	OPDC area	Connections to new stations should take priority to capitalise on new transport services. There is also a need to secure improved bus connections between Old Oak and Park Royal to ensure that the existing community can take advantage of the benefits the new interchange at Old Oak Common would bring to the area.
		T6	+	S,M-T,D,R,M	OPDC and surrounding area	The policy aims to reduce severance and benefit connectivity.
		T7	0			The policy would not have any significant effects for the objective.
		T7 Option 1	0			The option would not have any significant effects for the objective.
		T7 Option 2	0			The option would not have any significant effects for the objective.
		T8	0			The policy would not have any significant effects for the objective.
		T8 Option 1	0			The option would not have any significant effects for the objective.
		T8 Option 2	0			The option would not have any significant effects for the objective.
		T9	?			Large construction projects and new development may help create a greater sense of place and build the existing community. The Construction Logistics Strategy promises to minimise disruption to surrounding residents and business should prevent unrest in the community.
		T9 Option 1	0			The option would not have any significant effects for the objective.
		T9 Option 2	0			The option would not have any significant effects for the objective.
		T10	+	S,M,L-T,I,R,L	OPDC area	Transport Assessments and Travel Plans will aim to protect the livelihood of the community through ensuring transport safety, efficiency and mitigating the impact on the existing network. This should unite the community.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T10 Option 1	+	S,M,L-T,I,R,M	OPDC area	More scrutiny over development and early pre-application engagement should help protect the community.
		T10 Option 2	0			The option would not have any significant effects for the objective.
14	Improve safety and reduce crime and the fear of crime	T1	+	S,M,L-T,D,R,H	OPDC area and London wide	The policy addresses the importance of safety through the delivery of accessible transport systems to facilitate the existing community and planned in these areas of London.
		T1 Option 1	-	S,M,L-T,D,R,H	OPDC area and London wide	The option to prioritise car travel contradicts safe, accessible transport infrastructure and may negatively impact on the safety of the community.
		T2	+	S,M-T, D,R,M	OPDC area	The existing pedestrian environment within the development area is poor. There is limited permeability and a lack of lighting and active frontages, which creates an unwelcoming streetscape, a perception of poor personal security and a fear of crime, particularly after dark. However, the policy does aim to make walking routes safer and more legible for the users to provide clear, comprehensive and consistent wayfinding information and enable pedestrians to complete more journeys on foot
		T3	+	S,M-T, D,R,H	OPDC and surrounding area	The policy seeks to promote safety and security measures for cyclists.
		T4	+	M,L-T,D,R,L	London wide	There is a range of potential smart rail innovations that could be achieved with advances in security technology.
		T5	+	S,M-T, D,R,H	OPDC and surrounding area	The policy seeks to provide clear and legible signage for bus users. Infrastructure should include bus priority measures such as priority at junctions, bus gates and bus only links as well as suitably located bus stops, stands and welfare provision for drivers *Improved lighting and high quality shelters should be implemented on all bus services and at all bus stops.*
		T6	0			The policy would not have any significant effects for the objective.
		T7	0			The policy would not have any significant effects for the objective.
		T7 Option 1	0			The option would not have any significant effects for the objective.
		T7	0			The option would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 2				
		T8	+	S,M,L-T,D,R	London wide	The policy explains that the volume of freight and servicing movements raises challenges in terms of maintenance and management of the road network and the safety and environment for other road users. FORS is an overarching scheme that encompasses all aspects of safety, fuel efficiency, economical operations and vehicle emissions.
		T8 Option 1	0			The option would not have any significant effects for the objective.
		T8 Option 2	0			The option would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.
		T9 Option 1	0			The option would not have any significant effects for the objective.
		T9 Option 2	0			The option would not have any significant effects for the objective.
		T10	0			The policy would not have any significant effects for the objective.
		T10 Option 1	0			The option would not have any significant effects for the objective.
		T10 Option 2	0			The option would not have any significant effects for the objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote	T1	++	S,M,L-T,D,IR,H	OPDC Area and nationwide	As explained in the policy The NPPF emphasises the important role that transport policies have to play in facilitating sustainable development and in contributing to wider sustainability and health objectives, and notes that the transport system needs to be balanced in favour of sustainable transport methods that are efficient, safe and accessible and that have a low impact on the environment. Encouraging transport improvements that are both sustainable and technologically apt will deliver enormous quality of life benefits and deliver a step change in the appeal of walking and cycling as healthy, active travel options. OPDC is striving to become an

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	healthy living					exemplar NHS Healthy Town and to gain WHO Healthy City status. Provision of healthy street environments and that encourage walking, cycling and public transport use must be sought.
		T1 Option 1	-	S,M,L- T,D,IR,H	OPDC Area and nationwide	This option would support proposals which prioritise cars above more sustainable modes would increase congestion, noise and emissions and fewer people would make journeys by foot, bike or public transport impacting on health and well-being.
		T2	++	S,M,L T,D,IR,M	OPDC area and London wide	Providing a street network that is safe, attractive and easy to navigate, people will be encouraged to walk more, which will have social, economic, environmental and health benefits and support the viability of the development area.
		T3	+	S,M,L- T,D,IR,M	OPDC area, London and Nationwide	As explained in the policy '*the expected growth of cycling up to 2026 is estimated to deliver £250m in economic health benefits annually.'* Providing a street network that is safe, attractive and easy to navigate, people will be encouraged to cycle more, which will have social, economic, environmental and health benefits and support the viability of the development area.
		T4	+	S,M,L- T,D,R,H	OPDC area, London and Nationwide	Increased rail use can encourage more walking/cycling and reduce the use of a private car. This would reduce the levels of carbons emissions and therefore benefit the objective.
		T5	+	S,M,L- T,D,R,H	OPDC area, London and Nationwide	Increased rail use can encourage more walking/cycling and reduce the use of a private car. This would reduce the levels of carbons emissions and therefore benefit the objective.
		T6	+	S,M,L- T,D,R,M	OPDC area	If new streets are well designed with green infrastructure and improved connectivity they may benefit the objective and help to avoid social exclusion and mental health issues. *We recommend that new streets should give consideration to connecting more isolated areas and seek to reduce social exclusion.*
		T7	+	S,M,L- T,I,R,M	OPDC area	Low levels of car parking will be essential to ensure that traffic congestion does not reach unacceptable levels. This indirectly bring health benefits to the community.
		T7 Option 1	-	S,M,L- T,I,R,M	OPDC area	Less stringent car parking standards may encourage private car use therefore increasing pollution level and potentially harming the health of the local community.
		T7	+	S,M,L-	OPDC area	The use of more sustainable transport due to limited car parking would have a positive

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 2		T,I,R,M		effect on the health of the local community.
		T8	+/-	S,M,L-T,I,R,M	OPDC and surrounding areas	The significant HGV activity in the development area can have negative impacts on the health and well-being of the community. However, coordination of HGV activity and the provision of facilities for home deliveries within residential developments may help maintain the health of the local community.
		T8 Option 1	0			The option would not have any significant effects for the objective.
		T8 Option 2	0			The option would not have any significant effects for the objective.
		T9	+/-	S,M,L-T,I,R,M	OPDC area	The policy highlights that construction traffic will increase the volume of HGVs and other construction vehicles on the local and strategic road network. This will need careful planning, coordination and management to minimise its traffic and environmental impacts to minimise health risk.
		T9 Option 1	-	S,M,L-T,D,R,M	London wide	The option to programme construction works without any coordination with other projects would lead to very high volumes of construction vehicles on the road network which would also have environmental and health disbenefits.
		T9 Option 2	+	S,M,L-T,D,R,M	London wide	This option would reduce the impacts of construction on the road network due to the alternative use of rail or water for all freight. The reduced levels of pollution would have a positive effect on the health of the local residents and the environment.
		T10	+	S,M,L-T,I,R,M	OPDC area	All development proposals will be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network, and against the existing and potential availability of public transport, and its capacity to meet increased demand. More public transport and sustainable travel availability should contribute to healthier living.
		T10 Option 1	?			More control over development proposals against the impact on the transport network should make it easier to address the health implications for the local community.
		T10 Option 2	-	S,M,L-T,I,R,M	OPDC area	Increased development without sufficient public transport infrastructure could have a negative effect on the use of sustainable travel and the health of the local community.
16	To improve	T1	+	S,M,L-T,	OPDC area	The policy benefits connectivity and may help improve access to schools and higher

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	the education and skills levels of all members of the population, particularly vulnerable groups			D,R,M		education. *We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.*
		T1 Option 1	0			The option would not have any significant effects for the objective.
		T2	+	S,M,L-T, D,R,M	OPDC area	The policy benefits walking routes which provide access to schools and higher education. *We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.*
		T3	+	S,M,L-T, D,R,M	OPDC area	The policy benefits walking routes which provide access to schools and higher education. *We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.*
		T4	+	S,M,L-T, D,R,M	OPDC area	The policy benefits connectivity through rail use which will help improve access to schools and higher education. *We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.*
		T5	++	S,M,L-T, D,R,M	OPDC area	The policy benefits connectivity through bus travel which will help improve access to schools and higher education. *We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.*
		T6	0			The policy would not have any significant effects for the objective.
		T7	0			The policy would not have any significant effects for the objective.
		T7 Option 1	0			The option would not have any significant effects for the objective.
		T7 Option 2	0			The option would not have any significant effects for the objective.
		T8	0			The policy would not have any significant effects for the objective.
		T8	0			The option would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Option 1				
		T8 Option 2	0			The option would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.
		T9 Option 1	0			The option would not have any significant effects for the objective.
		T9 Option 2	0			The option would not have any significant effects for the objective.
		T10	+	S,M,L-T,D,R,M	OPDC area and London wide	All proposals for new or significantly expanded schools or other education or institutional uses should be accompanied by a Travel Plan. The Travel Plan could help improve levels of access to schools from a range of different areas.
		T10 Option 1	0			The option would not have any significant effects for the objective.
		T10 Option 2	0			The option would not have any significant effects for the objective.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	T1	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy seeks to improve sustainable access as a consequence of the HS2 and Crossrail projects. Access in this area will be transformed to cater for the additional homes and jobs.
		T1 Option 1	+			The option would benefit from the improved access in the area
		T2	+	S,M,L-T,D,R,M	OPDC area and London wide	Redevelopment presents an opportunity to enhance existing and provide new pedestrian environments across Old Oak and Park Royal. High quality pedestrian walking routes to Old Oak Common station from all areas will be vital to ensure residents, employees and business can benefit from this new transport superhub.
		T3	++	S,M,L-T,D,R,M	OPDC area	The policy will benefit the objective by OPDC working with businesses in Park Royal to develop training and guidance and improve awareness of the benefits of cycling to employees to encourage more cycling. In Old Oak, redevelopment provides an opportunity to push the boundary and provide state of the art cycling infrastructure that

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						can benefit everyone who lives and works in the area.
		T4	++	S,M,L-T,D,R,H	OPDC area and London wide	The policy explains that the new HS2, Crossrail and Great West Mainline station at Old Oak Common will be a key driver for regeneration in the area. When built out the core area at Old Oak will be served by approximately ten different rail services and over 200 trains per hour at peak times. This will benefit the social and economic wellbeing of the local people and provide sufficient access to key employment and training areas.
		T5	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy states that increased bus services and frequencies would provide improved connections to homes, office and retail destinations in Old Oak and Park Royal reducing dependence on the private car. This is of particular relevance for existing business in Park Royal whereby a high percentage of people live within 5-8km of the area and therefore making a reliable and frequent bus service a viable option for travelling to work.
		T6	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy seeks to enhance existing streets and junctions to mitigate the impacts of development on the surrounding local and strategic road network. A better road network in the OPDC are would better serve local communities and improve employment provision.
		T7	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy promotes car free development close to public transport hubs and zero car parking for non-residential developments in Old Oak. Despite benefitting the environmental wellbeing of the community this may hinder accessibility to employment due to dependence on public transport. There is likely to be a strong demand for taxis and private hire vehicles (PHVs) generated by the HS2/ Crossrail/ National Rail interchange.
		T7 Option 1	+/-	S,M,L-T,D,R,M	OPDC area	The less stringent car parking standards in this option would place unacceptable impacts on the surrounding road network which may discourage sustainable travel but maintain sufficient access to employment.
		T7 Option 2	-	S,M,L-T,D,R,M	OPDC area	A car free policy option would also negatively impact businesses that rely on private vehicles, particularly in Park Royal.
		T8	0			The policy would not have any significant effects for the objective.
		T8 Option 1	0			The option would not have any significant effects for the objective.
		T8 Option 2	0			The option would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T9	+	S,M,L- T,D,R,M	OPDC area	More construction work would provide an employment source for the local community.
		T9 Option 1	0			The option would not have any significant effects for the objective.
		T9 Option 2	0			The option would not have any significant effects for the objective.
		T10	?			Transport Assessments and Travel Plans will address any access issues to key services such as employment hubs.
		T10 Option 1	0			The option would not have any significant effects for the objective.
		T10 Option 2	-	S,M,L- T,I,R,L	OPDC and surrounding area	This option could lead to access issues, a congested road network and insufficient public transport infrastructure. This may result in problems accessing employment and training facilities.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	T1	+	S,M,L- T,I,R,M	OPDC area and London wide	The policy states that, as a consequence of the HS2 and Crossrail projects, there be greater investment in the area.
		T1 Option 1	++	S,M,L- T,D,R,M	OPDC and surrounding boroughs	This option would benefit the objective with support for proposals which prioritise cars above more sustainable modes which may benefit some businesses and residents.
		T2	++	S,M,L- T,D,R,H	OPDC area	Walking as a sustainable form of transport can bring economic benefits. Through an increase in footfall, the vitality of an area is likely to increase and subsequently bring benefits to local businesses. Redevelopment presents an opportunity to enhance the existing pedestrian environment and deliver a high quality pedestrian environment in Old Oak and Park Royal. High quality pedestrian walking routes to Old Oak Common station from all areas will be vital to ensure residents, employees and business can benefit from the new transport superhub.
		T3	++	S,M,L- T,D,R,M	OPDC area and London wide	Investments in “end-of-journey” cycle facilities in the form of secure cycle parking, lockers and showers are also vital across Old Oak and Park Royal. Major employers, businesses and landowners should invest in this infrastructure, recognising its value and importance to their businesses, tenants and employees.
		T4	++	S,M,L-	OPDC area	The policy explains that the new HS2, Crossrail and Great West Mainline station at Old

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T,I,R,H	and London wide	Oak Common will be a key driver for regeneration in the area. This should attract investment and benefit local businesses to improve the local economy.
		T5	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy promotes sustainable bus travel. Increased bus frequencies, better journey time reliability, new and improved bus stops and a more efficient service should encourage inward investment and attract businesses to the area. This will have a positive effect on the local economy.
		T6	+/-	S,M,L-T,D,R,M	OPDC area and London wide	The policy states that congestion at key junctions and on links providing access to strategic routes is a barrier to business growth. However, In Park Royal, the road network will need to prioritise the movement of freight to facilitate business growth. This will need to be carefully planned alongside the need to improve bus movements, pedestrians and cyclists and deliver a healthy street environment.
		T7	++	S,M,L-T,D,R,M	OPDC area and London wide	Sufficient car parking will need to be provided to meet the essential needs of developments, particularly ensuring that there are suitable places for disabled people, car clubs and electric cars and facilitating the successful operation of the Park Royal industrial estate. This approach is justified by the very high level of public transport accessibility resulting from the planned and proposed investment. The need for access to a car can be met in part by dedicated car club spaces together with parking for disabled people.
		T7 Option 1	0			The option would not have any significant effects for the objective.
		T7 Option 2	-	S,M,L-T,D,R,M	OPDC area	A car free policy option would also negatively impact businesses that rely on private vehicles, particularly in Park Royal.
		T8	0			The policy would not have any significant effects for the objective.
		T8 Option 1	+/-	S,M,L-T,D,R,M	London wide	This option may have some attraction for businesses. However, if no measures were put in place to control servicing and deliveries, HGVs and LGVs flow would increase drastically, exacerbating the congestion issues in the development area, as well as having noise and environmental impacts, affecting the public realm and using up road space.
		T8 Option 2	-	S,M,L-T,D,R,M	OPDC and surrounding area.	This option explains that banning larger vehicles completely would negatively impact businesses. This could detract certain types of industries moving into the area.
		T9	+	S,M,L-	OPDC and	The nearby delivery of HS2 and Crossrail may encourage other businesses and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T,D,R,M	surrounding area.	investment to move into the area. For existing businesses the construction disruptions will be minimised by the Construction Logistics Strategy.
		T9 Option 1	0			The option would not have any significant effects for the objective.
		T9 Option 2	0			The option would not have any significant effects for the objective.
		T10	0			The policy would not have any significant effects for the objective.
		T10 Option 1	0			The option would not have any significant effects for the objective.
		T10 Option 2	0			The option would not have any significant effects for the objective.

Table G-10 Chapter 12: Environment and Utilities

- EU1: Strategic Policy: environment and utilities
- EU2: Smart
- EU3: Water
- EU4 Waste management
- EU5: Circular economy and resource efficiency
- EU6: Decentralised Energy
- EU7: Digital communications infrastructure
- EU8: Green infrastructure and biodiversity
- EU9: Extraction of Minerals
- EU10: Air quality
- EU11: Noise
- EU12: Land contamination

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to work with developers to promote sustainable development that utilises high standards of design, innovation, planning etc, this would therefore optimise opportunities to encourage 'place making' at the start of the planning process. Utilising high standards of design may also contribute to enhancing local character and distinctiveness.
		EU2	+	S, M and L-T, D, R, M	OPDC area	Promoting the area as a global leading location for the exploration and implementation of smart city technology, concepts and systems would benefit this SA Objective as it actively encourages the use of contemporary technology – although the policy does not explicitly state this would be within the public realm a positive score has been noted.
		Alternative Policy Option 1	0			A neutral score has been recorded against the SA Objective as not specifically supporting inter-operable and open data would not detract nor benefit the SA Objective.
		EU3	+	M and L-T, I, R, L	OPDC area	The policy would ensure public areas are accessible in the medium to long term through managing surface water runoff and implementing flood risk management solutions. In addition, it would also indirectly contribute to ensuring new buildings are appropriately designed i.e. through ensuring they do not lead to inappropriate run off or lead to an unacceptable demand on water resources.
		EU4	?			The relocation of waste and recycling sites (depending upon the final design) may lead to a detrimental effect on landscape character. *Due to this uncertainty it is recommended that the policy is strengthened to include a statement to say that sites would only be permitted where it can be demonstrated they would not significantly affect the character of the local area.* Although it is noted that plan should be read as a whole and this is covered elsewhere.
		EU4 Option 1	-	M and L-T, I, R, L	OPDC area	Safeguarding 'all' sites in Old Oak may lead to more waste sites in the area and less homes, this would therefore go against 'the principles of 'place making' and why a negative score has been noted.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	?			Seeking to support and facilitate the provision of infrastructure to deliver a decentralised energy network within major new development may affect the character and quality of the built environment of the OPDC area depending on its visual

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						appearance. *Due to this uncertainty it is recommended that the policy is strengthened to include a statement to say that energy development would only be permitted where it can be demonstrated it would not significantly affect the character of the local area.* Although it is noted that plan should be read as a whole and this is covered elsewhere.
		EU6 Option 1	?			Although the alternative policy option would bring about more uncertainty as it would apply to all new development rather than just major development.
		EU7	+	S, M and L-T, D, R, M	OPDC area	Seeking to integrate technology and seeking to accommodate future technologies would benefit this SA Objective as it actively encourages the use of contemporary technology (part of the sub-objectives) – although the policy does not explicitly state this would be within the public realm a positive score has been noted.
		EU7 Option 1	0			A neutral score has been recorded against the SA Objective as not specifically seeking to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities.
		EU8	++	S, M and L-T, D, R, M	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening would lead to a positive effect on the SA Objective as it would directly enhance the built environment and encourage 'place making'. For this reason a major positive score has been recorded.
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would lead to a minor positive effect as deleting the policy reference to 'all' development, so that the policy requirements apply to 'major' development only would not be as positive.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy's commitment to ensuring the design of oil / gas development is sensitive to the character of the urban landscape and to features of national, London, and local importance would benefit this SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU11	+	S, M and L-T, I, R, L	OPDC area	Guarding against inappropriate increases in noise levels from major development would indirectly contribute to the creation of safe and welcoming spaces.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU12	0			There is no direct link between the policy and the SA Objective.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	EU1	0			There is no clear link between the policy and the SA Objective.
		EU2	0			There is no direct link between the policy and the SA Objective.
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.
		EU4	0			There is no direct link between the policy and the SA Objective.
		EU4 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	0			There is no direct link between the policy and the SA Objective.
		Alternative Policy Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU8	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	EU1	+			The policy states that OPDC supports proposals that maximise their contribution to a healthy and safe environment for people and for nature.
		EU2	0			There is no direct link between the policy and the SA Objective.
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.
		EU4	+	S, M and L-T, D, R, M	OPDC area and wider area	The policy seeks to safeguard waste and recycling sites within the OPDC area which would maintain current accessibility to waste facilities at those identified sites. The policy also states that OPDC will work with other waste operators to relocate some sites to suitable areas. This could be strengthened to state that '*it would be ensured sites would be relocated to sites that are highly accessible by a variety of transport modes*'.
		EU4 Option 1	+	S, M and L-T, D, R, M	OPDC area and wider area	The alternative policy option would result in a change to criterion b). The change provides for 'safeguarding 'all' sites in Old Oak rather than just one site. Therefore as above this would maintain current accessibility to waste facilities as per the preferred policy. The remainder of the policy and scores recorded would remain as per the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						preferred option.
		EU5	+	S, M and L-T, D, R, M	OPDC area and wider area	The policy would result in ensuring new development provides adequate provision for convenient domestic and commercial waste storage – this would therefore contribute to increasing accessibility to household and commercial waste management facilities.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU7	0			There is no direct r link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct r link between the alternative policy option and the SA Objective.
		EU8	0			There is no direct link between the policy and the SA Objective.
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU9	0			There is no direct link between the policy and the SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU12	++	L-T, D, R, M	OPDC area	The policy ensures that development would not be permitted until effective measures are taken to manage the risk of contaminated land through treating, containing or controlling. This would therefore fulfil this SA Objective as it would contribute to a scheme of land remediation and improve soil quality over the long term.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	EU1	?			The policy seeks to ensure that new developments minimise carbon dioxide emissions. However there is no specific reference to how this would be achieved. This could be defined in supporting evidence.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage sustainable transport modes.
		EU2 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU3	+	M and L-T, D, R, L	OPDC area	The policy would maintain accessibility within the OPDC area in the medium to long term through managing surface water runoff and implementing flood risk management solutions.
		EU4	0			Although a neutral score has been recorded, *it is recommended that the relocation of any waste operators are directed to areas that are readily accessible via a number of modes of transport.*
		EU4 Option 1	0			There is no direct link between the alternative policy and the SA Objective i.e. safeguarding 'all' sites in Old Oak would not affect the SA Objective.
		EU5	+	S, M and L-T, D, R, L	OPDC area	The policy seeks to investigate the movement of waste through by sustainable means of transport, including by rail and by the Grand Union Canal which may mitigate impacts on the transport network. It also seeks to design out waste from construction which may also mitigate impacts on the transport network.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU7	+	M and L-T, D, R, L	OPDC area	The policy may over the medium to long term contribute to encouraging video conferencing and home working in addition to home shopping therefore reduce the need to travel.
		EU7 Option 1	0			Benefits recorded above would not be realised under the alternative option.
		EU8	+	S, M and L-T, I/D, R, L	OPDC area	The policy seeks to ensure that all development proposals protect, enhance, and create a network of multi-functional green and water spaces connected by street greening. It is considered that this may contribute to the SA Objective through increasing the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks.
		EU8 Option 1	+	S, M and L-T, I/D, R, L	OPDC area	Removing the requirement within the policy to require that only 'major' new development proposals protect, enhance, and create a network of multi-functional green and water spaces connected by street greening rather than requiring 'all' new development would water down the positive score recorded for the preferred option.
		EU9	0			The policy ensures that any proposals for development associated with the exploration, appraisal and operation of unconventional oil and gas resources would be acceptable in terms of site access, traffic generation and the routing of heavy vehicles along with the effects on public rights of way, open spaces or outdoor recreation. Effects have been recorded as neutral as the policy would ensure the continuation of the existing baseline.
		EU10	+	S, M and L-T, D, R, M	OPDC area	Ensuring air quality assessments are undertaken for all major development within the OPDC area would ensure that the impact of construction traffic (mitigating the impact of construction traffic is listed as a sub-objective) is minimised as the assessment would also outline mitigation measures to reduce any identified impacts. For this reasons a positive score has been recorded over the short to long term.
		EU10 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would perform is a similar way to the preferred option as it would only involve the removal 'major development' so that all development would require an air quality assessment.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
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	EU1	0			There is no direct link between the policy and the SA Objective.
		EU2	0			There is no direct link between the policy and the SA Objective.
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	+	S, M and L-T, I, R, M	OPDC area	The policy would indirectly contribute to ensuring new homes are appropriately designed and located through ensuring they do not lead to inappropriate run off, flood risk or unacceptable water demand.
		EU4	0			There is no direct link between the policy and the SA Objective.
		EU4 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU8	0			There is no direct link between the policy and the SA Objective.
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU9	0			There is no direct link between the policy and the SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	EU1	++	S, M and L-T, D, R, M	Old Oak and Park Royal	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. The policy seeks to increase the area's resilience to the effects of a changing climate, and seeks to minimise carbon dioxide emissions. Draft targets are provided, of which one states *'Use SuDs to achieve run-off rate equivalent to a greenfield site'.* This holistic and evolving approach will support the delivery of the Objective.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative climate change adaptation and mitigation measures.
		EU2 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU3	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy positively fulfils the SA Objective through promoting the use of sustainable drainage techniques within new development along with implementing flood risk management solutions identified in the relevant borough's Surface Water Management Plans.
		EU4	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU4 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU5	++	S, M and L- T, D, R, M	OPDC area and wider area	The policy seeks to promote a circular economy which will ultimately help to mitigate climate change.
		EU6	++	S, M and L- T, D, R, M	OPDC area and wider area	The policy is principally focused on ensuring new major development is able to accommodate energy demand through a decentralised energy network which will help to mitigate climate change and provide a resilient energy supply.
		EU6 Option 1	?			The alternative policy option would perform as per the preferred option. However, the recommendation would not just apply to energy development associated with 'major' new development, it would apply to 'all' development.
		EU7	0			There is no clear link between the policy and the SA Objective.
		EU7 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU8	++	S, M and L- T, D, R, M	OPDC area and wider area	The policy will play a leading role to ensure development helps to mitigate and address climate change by delivering a multifunctional network of green infrastructure.
		EU8 Option 1	+	S, M and L- T, D, R, M	OPDC area and wider area	This option would limit the delivery of green infrastructure to major development thereby having less of a positive impact on the objective.
		EU9	+	S, M and L- T, D, R, M	OPDC area	The policy seeks to ensure that applications for the exploration, appraisal and operation of unconventional oil and gas resources will be permitted subject to series of criteria to manage a range of impacts. Therefore a positive score has been recorded against this SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option	0			There is no clear link between the alternative policy option and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		1				
		EU11	0			There is no clear link between the policy and the SA Objective.
		EU12	0			There is no clear link between the policy and the SA Objective.
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	EU1	+	S, M and L-T, D, R, M	Old Oak and Park Royal	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. Draft targets are provided, of which one states *'Generate 25% of London's energy locally'.* This would therefore contribute to encouraging development within the area to be to be more self-sufficient in terms of energy generation and is why a positive score has been noted.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative energy generation, distribution and storage.
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.
		EU4	0			There is no direct link between the policy and the SA Objective.
		EU4 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU5	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to reduce waste generated by new development through using waste as a resource e.g. through maximising the use of secondary materials and the opportunities for reuse or recycling of materials remaining from construction and investigating the potential for on-site energy recovery from waste. This would benefit the SA Objective as it would contribute to minimising the resource requirements and outputs for new development.
		EU6	++	M and L-T, D, R, M	OPDC area	The policy supports and seeks to facilitate the provision of infrastructure to deliver a decentralised energy network as part of new major development. This would positively benefit the SA Objective as would encourage new major development to be more self-

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						sufficient over the medium to long term.
		EU6 Option 1	++	M and L-T, D, R, M	OPDC area	The alternative policy option would perform as per the preferred option. However, the recommendation would not just apply to energy development associated with 'major' new development, it would apply to 'all' development.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU8	0			There is no direct link between the policy and the SA Objective.
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy's commitment to ensuring the design of oil / gas development controls and mitigations greenhouse gas emissions and dust during construction and operation would benefit this SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for	EU1	++	M and L-T, D, R, M	OPDC area and wider area	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. Draft targets are provided, of which the draft waste targets include: *'Working towards zero biodegradable / recyclable waste to landfill by 2026'* and *'90% re-cycling / re-purposing of construction materials'.* This would therefore contribute to increasing the amount of recycled materials for the construction of buildings and addressing the displacement of waste. For these reasons a major positive score has been recorded.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative waste collection.
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.
		EU4	+	S, M and L-T, D, R, M	OPDC area and wider area	The policy seeks to safeguard waste and recycling sites within the OPDC area which would maintain current accessibility to waste facilities at those identified sites. The policy also states that OPDC will work with other waste operators to relocate some sites to suitable areas. This could be strengthened to state that '*it would be ensured sites would be relocated to sites that are highly accessible by a variety of transport modes*'.
		EU4 Option 1	0			There is no clear link between the alternative policy and the SA Objective i.e. safeguarding 'all' sites in Old Oak would not affect the SA Objective.
		EU5	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to reduce waste and use it as a resource particularly on building sites. It also commits to investigating the potential for the movement of waste and recyclable materials during construction by sustainable means of transport, including by rail, and by the Grand Union Canal. All of which would promote the circular economy for the production of waste, increase the use of recycled materials in construction and maximises the use of innovative waste collection. As the policy largely fulfils their SA Objective and its sub-objective a major positive score has been recorded.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU8	0			There is no direct link between the policy and the SA Objective.
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU9	+	M and L-T, D, R, M	OPDC area	The policy stipulates that applications for the exploration, appraisal and operation of unconventional oil and gas resources will be permitted where they demonstrate the efficient use of resources such as construction materials. This would therefore contribute albeit slightly to supporting the SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to remediate contaminated land. This would therefore partially fulfil the SA Objective through contributing to the sustainable management of contaminated soils.
9	Improve the quality of the water environment	EU1	++	S, M and L-T, D, R, M	OPDC area	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. Draft targets are provided and water related targets include '*minimising use of mains water'* and '*water efficiency of 105 lphpd to match higher requirements of Building Regulations'*. This would therefore promote improved efficiency in the use of water domestically and commercially.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to manage and monitor water quality.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU2 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU3	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure new development proposals promote integrated water management, through addressing surface and waste-water disposal capacity issues, sustainably managing water supply and minimising water consumption. All of which promotes efficiency in the use of water. In addition the policy also seeks to ensure new development protects and improve the water environment of the Grand Union Canal and other watercourses. This would contribute to the protection of local water courses.
		EU4	0			There is no direct link between the policy and the SA Objective.
		EU4 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	0			Seeking to support and facilitate the provision of infrastructure to deliver a decentralised energy network within major new development may pose a risk to the water environment through contaminated run-off.
		EU6 Option 1	?			As above. Although the alternative policy option would bring about more uncertainty as it would apply to all new development rather than just major development.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to maximise opportunities to protect and / or enhance biodiversity in the Grand Union Canal and protect, enhance, and creates a network of multi-functional water spaces. This would therefore help to meet the SA sub-objectives, more specifically *'to promote the quality of local watercourses'.*
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would perform in a similar way to the preferred option, albeit to a lesser extent as the policy would apply to 'major' development only and not 'all' development.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU9	+			The policy seeks to ensure that oil and gas development incorporates the efficient use of resources such as water which could lead to some benefits against this objective. However, the policy does not specifically state that oil and gas development should seek to ensure the quality of the water environment is protected. This will be covered by other Local Plan and London Plan policies. The policy also states that a careful balance should be struck between any potential impact on the environment on our communities and businesses. This should restrict the potential for negative effects.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU11	0			There is no clear link between the policy and the SA Objective.
		EU12	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that the remediation of contaminated land for new development does not lead to the contamination of any watercourse, water body or aquifer. As the policy directly seeks to prevent the risk posed to the water environment from the run-off of contaminants a positive score has been recorded.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. Draft targets are provided and those relevant include '*no net loss of biodiversity*' and '*increase tree cover by at least 10%*'. This would therefore contribute to conserving biodiversity. The policy also commits to promoting ecological enhancement. *To improve the sustainability performance of the policy it is recommended that the draft target seeking to ensure there is no net loss of biodiversity is amended in line with the NPPF to state new development should 'achieve net gains for nature'.*
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to manage and monitor biodiversity.
		EU2 Option	0			There is no direct link between the alternative policy option and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		1				
		EU3	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure development proposals within Park Royal and Old Oak include measures to protect and improve the ecological value of the Grand Union Canal and other watercourses. This may contribute to improving the existing poor biological quality Grand Union Canal and conserving overall biodiversity across the plan area.
		EU4	0			The relocation of waste and recycling sites (depending upon the location) may lead to a detrimental effect on biodiversity.
		EU4 Option 1	0			There is no direct link between the alternative policy and the SA Objective i.e. safeguarding 'all' sites in Old Oak would not affect the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	?			Seeking to support and facilitate the provision of infrastructure to deliver a decentralised energy network within major new development may lead to a loss in biodiversity resources.
		EU6 Option 1	?			As above. Although the alternative policy option would bring about more uncertainty as it would apply to all new development rather than just major development.
		EU7	0			There is no clear link between the policy and the SA Objective.
		EU7 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU8	++	S, M and L-T, D, R, M	OPDC area	A major positive score has been recorded against the SA Objective as the policy seeks to ensure all new development conserves / enhances existing biodiversity, increases connectivity of habitats through the provision of green infrastructure and protecting designated sites.
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would perform in a similar way to the preferred option, albeit to a lesser extent as the policy would apply to 'major' development only and not 'all' development.
		EU9	?			Effects are recorded as uncertain as extraction of minerals could adversely affect biodiversity. *It is therefore recommended that an additional criterion is added to the policy to ensure that any applications for the exploration, appraisal and operation of*

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						unconventional oil and gas resources safeguard existing biodiversity across the plan area.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	+	S, M and L-T, D, R, L	OPDC area	Seeking to remediate contaminated land within the OPDC area and guarding against the risk of contaminated run off to watercourses would benefit the SA Objective and may increase biodiversity resources on brownfield sites. However, this would be dependent upon the final development on the site. A low certainty has therefore been recorded.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy commits to promoting Old Oak and Park Royal as a best practice demonstrators for environmental sustainability. OPDC aim to achieve this through the identification and definition of environmental sustainability targets and indicators for the area. Draft targets are provided, those relevant include '*the best air quality of any major world city by 2020'* and '*guidelines produced under the auspices of the World Health'* Organisation. This would therefore contribute to minimising air and noise pollution for communities and is why a positive score has been noted.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to manage and monitor air, noise and light pollution.
		EU2 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.
		EU4	+	M and L-T, D, R, L	OPDC area	The relocation of waste and recycling sites (depending upon the location) may negatively impact on sensitive uses including existing and future homes and building occupants.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU4 Option 1	0			There is no clear link between the alternative policy and the SA Objective i.e. safeguarding 'all' sites in Old Oak would not affect the SA Objective.
		EU5	+	M and L-T, I, R, L	OPDC area	The policy commits to designing out waste from construction sites and maximising waste generated for re use in construction – over the medium to long term this may lead to a reduction in required traffic movements which in turn may contribute to minimising air pollution.
		EU6	+	M and L-T, D, R, L	OPDC area	The policy commits to supporting the provision of a decentralised energy network within major new development. With this there is the potential for noise, light and air pollution to be generated during the construction and operational phases.
		EU6 Option 1	?			As above. Although the alternative policy option would bring about more uncertainty as it would apply to all new development rather than just major development.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the policy and the SA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to protect, enhance, and create a network of multi-functional green and water spaces connected by street greening which will help to mitigate against air and noise pollution.
		EU8 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that any applications for the exploration, appraisal and operation of unconventional oil and gas protects nearby residents and businesses from the effects of the operations including effects from dust. This would therefore benefit the SA Objective.
		EU10	+	L-T, D, R, M	OPDC area	The policy states that that OPDC will seek to improve air quality and minimise air pollution impacts on health the natural and built environment and on amenity. It also outlines that they require new major development to be accompanied by an air quality assessment. This would ensure that new major development provides adequate mitigation measures to reduce any predicted adverse effects. This may over the long

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						term contribute to the removal of the designated AQMA within the area. For the reasons outline above effects are recorded as positive.
		EU10 Option 1	+	L-T, D, R, M	OPDC area	The alternative policy option would perform better against the SA Objective than the preferred option as it would require 'all' developments to require assessment for their impacts on air quality rather than just 'major' development.
		EU11	+	S, M and L-T, D, R, M	OPDC area	The principle focus of the policy is to ensure that new development does not lead to unacceptable increases in noise. The policy aims to achieve this through requiring new development applications to be accompanied by a noise assessment. Therefore effects have been recoded as positive.
		EU12	0			There is no clear link between the policy and the SA Objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to work with developers to promote sustainable development that utilises high standards of design, innovation, planning etc., this would therefore optimise opportunities to ensure the setting of heritage assets are protected at the start of the planning process. Utilising high standards of design may also contribute to enhancing local views and landscapes.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to conserve and enhance the historic environment.
		EU2 Option 1	0			A neutral score has been recorded against the SA Objective as not specifically supporting inter-operable and open data would not detract nor benefit the SA Objective.
		EU3	+	M and L-T, I, R, M	OPDC area	The policy would ensure surface water runoff is managed and flood risk management solutions are implemented as part of new development. This would protect heritage assets over the medium to long term from flood damage.
		EU4	+			The relocation of waste and recycling sites (depending upon the final design) may lead to a detrimental effect on the setting of heritage assets and potential unknown archaeological remains.
		EU4 Option 1	0			There is no clear link between the alternative policy and the SA Objective i.e. safeguarding 'all' sites in Old Oak would not affect the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU6	+			Seeking to support and facilitate the provision of infrastructure to deliver a decentralised energy network within major new development may affect the setting of historic assets within the OPDC area depending on its visual appearance.
		EU6 Option 1	0			As above. Although the alternative policy option would bring about more uncertainty as it would apply to all new development rather than just major development.
		EU7	0			There is no clear link between the policy and the SA Objective.
		EU7 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU8	++	S, M and L-T, D, R, M	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening would lead to a positive effect on the SA Objective as it would contribute to promoting the historical interpretation of heritage assets, including the canal through the use of multifunctional green infrastructure. In addition, green infrastructure would also contribute to enhancing local views and landscapes. For this reason a major positive score has been recorded.
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would lead to a minor positive effect as deleting the policy reference to 'all' development, so that the policy requirements apply to 'major' development only would not be as positive.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy's commitment to ensuring the design of oil / gas development is sensitive to the character of the urban landscape and to features of national, London, and local importance would only benefit this SA Objective. *However, this could be strengthened to state '…urban landscapes, heritage assets and features of ….'*
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU11	0			There is no direct link between the policy and the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to work with developers to promote sustainable development that utilises high standards of design, innovation, planning etc., this would therefore optimise opportunities to incorporate green infrastructure and the provision of open space / play spaces at the start of the planning process.
		EU2	0			There is no direct link between the policy and the SA Objective.
		EU2 Option 1	0			There is no direct link between the policy and the SA Objective.
		EU3	+	M and L-T, D, R, L	OPDC area	The policy would maintain accessibility within the OPDC area in the medium to long term through managing surface water runoff and implementing flood risk management solutions.
		EU4	0			There is no clear link between the policy and the SA Objective.
		EU4 Option 1	0			There is no clear link between the policy and the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy option and the SA Objective.
		EU7	+	L-T, D, R, L	OPDC area	Seeking to integrate technology and seeking to accommodate future technologies would benefit this SA Objective as may help to reduce social exclusion over the long term.
		EU7 Option 1	0			A neutral score has been recorded against the SA Objective as not specifically seeking to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities would significantly affect the SA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening would lead to

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						a positive effect on the SA Objective as it would directly increase connectivity and may help to create social linkages wit surrounding communities. It also seeks to ensure that development helps to balance the built and natural environment through a strategic and co-ordinated approach. For these reasons effects have been recorded as beneficial.
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would lead to a lesser positive effect as deleting the reference to 'all' development, so that the policy requirements apply to 'major' development only would not be as positive.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that any applications for the exploration, appraisal and operation of unconventional oil and gas protects nearby residents from the effects of the operations. It also goes further to say that applications will be assessed against the effects on public rights of way, open spaces and outdoor recreation. As this would help to maintain access to walking routes and recreation effects have been assessed as positive against the SA Objective.
		EU10	0			There is no direct link between the policy and the SA Objective.
		EU10 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU11	+	S, M and L-T, I, R, L	OPDC area	Guarding against inappropriate increases in noise levels from major development would indirectly contribute to maintaining / or potentially improving the quality of the public realm, recreation and play spaces which would benefit the SA Objective.
		EU12	0			There is no direct link between the policy and the SA Objective.
14	Improve safety and reduce crime and the fear of crime	EU1	0			There is no direct link between the policy and the SA Objective.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to help improve safety.
		EU2 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU3	0			There is no direct link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU4	0			There is no direct link between the policy and the SA Objective.
		EU4 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU5	0			There is no direct link between the policy and the SA Objective.
		EU6	0			There is no direct link between the policy and the SA Objective.
		EU6 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU7	0			There is no direct link between the policy and the SA Objective.
		EU7 Option 1	0			There is no direct link between the alternative policy and the SA Objective.
		EU8	?			There is no direct link between the policy and the SA Objective.
		EU8 Option 1	?			Deleting the reference to 'all' development, so that the policy requirements apply to 'major' development only would result in similar uncertainties.
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU11	0			There is no clear link between the policy and the SA Objective.
		EU12	0			There is no clear link between the policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	EU1	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to promote healthy communities through a set of draft sustainability targets set by OPDC for new development to meet. Targets include; reducing carbon emissions; achieving the best air quality of any major world city by 2020; meeting noise guidelines produced under the auspices of the World Health Organisation; and providing urban greening.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to support health and wellbeing.
		EU2 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU3	0			There is no clear link between the policy and the SA Objective.
		EU4	0			There is no clear link between the policy and the SA Objective.
		EU4 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU5	0			There is no clear link between the policy and the SA Objective.
		EU6	0			There is no clear link between the policy and the SA Objective.
		EU6 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU7	0			There is no clear link between the policy and the SA Objective.
		EU7 Option 1	0			There is no clear link between the alternative policy option and the SA Objective.
		EU8	+	S, M and L-T, D, R, L	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the SA Objective as may increase accessibility to social infrastructure and encourage more active lifestyles. For these reasons effects have been recorded as

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						positive.
		EU8 Option 1	+	S, M and L-T, D, R, M	OPDC area	The alternative policy option would lead to a lesser positive effect as deleting the reference to 'all' development, so that the policy applies to 'major' development only would not be as positive.
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	+	M and L-T, D, R, M	OPDC area	The policy states that OPDC will seek to improve air quality and minimise air pollution impacts on health through requiring new major development proposals to meet a set criteria. For this reason effects have been recorded as positive.
		EU10 Option 1	+	M and L-T, D, R, M	OPDC area	The alternative policy option would perform better against the SA Objective than the preferred option as it would require 'all' developments to require assessment for their impacts on air quality rather than just 'major' development.
		EU11	+	S, M and L-T, D, R, M	OPDC area	The principle focus of the policy is to ensure that new development does not lead to unacceptable increases in noise. The policy aims to achieve this through requiring new development applications to be accompanied by a noise assessment, which would include mitigation measures that would guard against any effects on health and quality of life. Therefore effects have been recoded as positive.
		EU12	+	M and L-T, D, R, H	OPDC area	The policy '*requires developers to complete the implementation of agreed measures to assess and abate any risks to human health'* for this reason effects have been assessed as positive
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	EU1	0			There is no clear link between the policy and the SA Objective.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to help provide access to education and skills training.
		EU2 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU3	0			There is no clear link between the policy and the SA Objective.
		EU4	0			There is no clear link between the policy and the SA Objective.
		EU4 Option	0			There is no clear link between the alternative policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		1				
		EU5	0			There is no clear link between the policy and the SA Objective.
		EU6	0			There is no clear link between the policy and the SA Objective.
		EU6 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU7	0			There is no clear link between the policy and the SA Objective.
		EU7 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU8	0			There is no clear link between the policy and the SA Objective.
		EU8 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU11	0			There is no clear link between the policy and the SA Objective.
		EU12	0			There is no clear link between the policy and the SA Objective.
17	Maximise the social and economic	EU1	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to promote healthy communities through a set of draft sustainability targets set by OPDC for new development to meet. Targets include; meeting noise guidelines produced under the auspices of the World Health Organisation; and providing urban greening – these would all contribute to improving wellbeing of the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	wellbeing of the local and regional population and improve access to employment and training					local population.
		EU2	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this SA Objective as it could encourage innovative mechanisms to help support the social and economic wellbeing of local people.
		EU2 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU3	0			There is no clear link between the policy and the SA Objective.
		EU4	0			There is no clear link between the policy and the SA Objective.
		EU4 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU5	0			There is no clear link between the policy and the SA Objective.
		EU6	0			There is no clear link between the policy and the SA Objective.
		EU6 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU7	0			There is no clear link between the policy and the SA Objective.
		EU7 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU8	+	S, M and L-T, D, R, L	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the SA Objective as may increase accessibility to employment and training and improve wellbeing. For these reasons effects have been recorded as positive.
		EU8 Option 1	+	S, M and L-	OPDC area	The alternative policy option would lead to a lesser positive effect as deleting the reference to 'all' development, so that the policy applies to 'major' development only would not be as positive.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T, D, R, M		
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU11	+	S, M and L-T, D, R, M	OPDC area	The principle focus of the policy is to ensure that new development does not lead to unacceptable increases in noise. The policy aims to achieve this through requiring new development applications to be accompanied by a noise assessment, which would include mitigation measures that would guard against any adverse on wellbeing. Therefore effects have been recoded as positive.
		EU12	0			There is no clear link between the policy and the SA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	EU1	0			There is no clear link between the policy and the SA Objective.
		EU2	+	M and L-T, D, R, M	OPDC area	The policy may encourage inward investment through its aspiration to become a global leading location for the exploration, exploitation and implementation of smart city technology, approaches and systems. For this reason effects have been recorded as positive.
		EU2 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU3	0			There is no clear link between the policy and the SA Objective.
		EU4	0			There is no clear link between the policy and the SA Objective.
		EU4 Option 1	0			There is no clear link between the alternative policy and the SA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU5	0			There is no clear link between the policy and the SA Objective.
		EU6	0			There is no clear link between the policy and the SA Objective.
		EU6 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU7	+	M and L-T, D, R, M	OPDC area	The policy seeks to deliver exemplar digital communication infrastructure. This may encourage inward investment through ensuring workspaces meet the needs of new and emerging businesses and increasing infrastructure capacity including broadband connections.
		EU7 Option 1	0			A neutral score has been recorded against the SA Objective as not specifically seeking to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities.
		EU8	0			There is no clear link between the policy and the SA Objective.
		EU8 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU9	0			There is no clear link between the policy and the SA Objective.
		EU10	0			There is no clear link between the policy and the SA Objective.
		EU10 Option 1	0			There is no clear link between the alternative policy and the SA Objective.
		EU11	0			There is no clear link between the policy and the SA Objective.
		EU12	0			There is no clear link between the policy and the SA Objective.

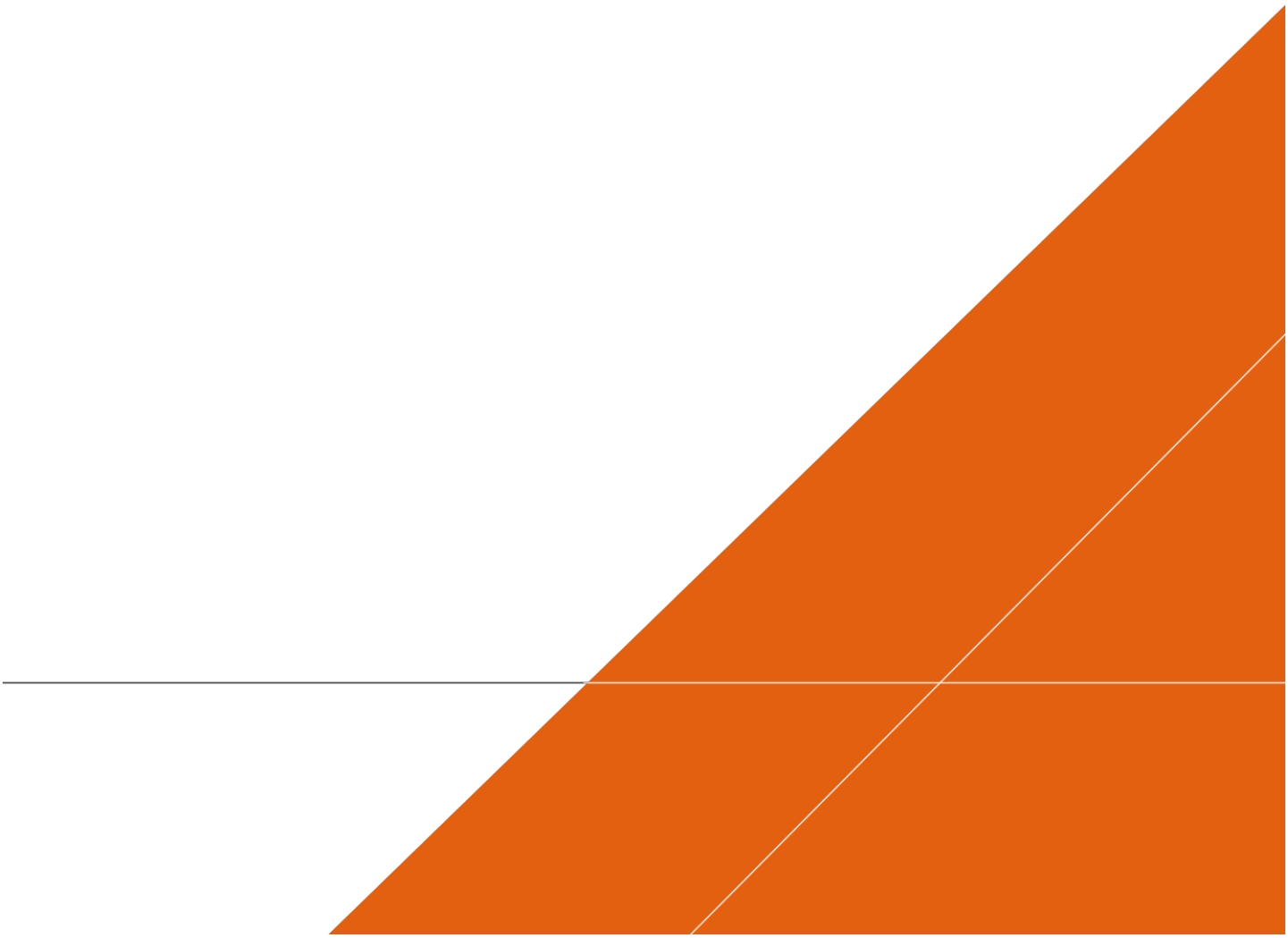
APPENDIX 2

IIA ADDENDUM

ARCADIS Design & Consultancy for natural and built assets

OPDC LOCAL PLAN
INTEGRATED IMPACT ASSESSMENT ADDENDUM

MAY 2019



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VERSION CONTROL

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2.0	28.03.19	Joseph Evans Sarah Tooby	Sarah Tooby David Hourd	David Hourd	Final Draft
3.0	17.04.19	Joseph Evans Sarah Tooby	Sarah Tooby David Hourd	David Hourd	Draft following Local Plan Hearing.
4.0	25.04.19	Joseph Evans Sarah Tooby	Sarah Tooby David Hourd	David Hourd	Final version

This report dated 25 April 2019 has been prepared for Old Oak and Park Royal Development Corporation (the "Client") in accordance with the terms and conditions of appointment dated 20 March 2019(the "Appointment") between the Client and **Arcadis (UK) Limited** ("Arcadis") for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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Appendix 1
Copy of Appendix G of Reg 18 IIA Report

1 Introduction

1.1 Background

The Old Oak and Park Royal Development Corporation (OPDC) is preparing a Local Plan to guide and manage development in the Old Oak and Park Royal area. Arcadis Consulting UK Ltd (Arcadis) has carried out an Integrated Impact Assessment (IIA) of the Local Plan on behalf of the OPDC to identify and evaluate the likely environmental effects of the Local Plan. The IIA incorporates the requirements of:

- **Sustainability Appraisal** (SA) as required by National Planning Policy Framework (NPPF) (MHCLG, July 2018) – Paragraph 32; Planning & Compulsory Purchase Act 2004 – Section 39(2); Planning & Compulsory Purchase Act 2004 – Section 19;
- **Strategic Environmental Assessment** (SEA) as required by Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive); and Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No. 1633) (the SEA Regulations);
- **Health Impact Assessment** (HIA) as referred to in National Planning Policy Guidance[1] and Policy 3.2 of the current London Plan, which also suggests integrating HIA into SEA and SA[2];
- **Equalities Impact Assessment** (EqIA) in line with requirements of the Equality Act 2010; and
- **Community Safety Impact Assessment** (CSIA) as required by Crime and Disorder Act 198 and Police Justice Act 2006.

Planning Policy Guidance recommends incorporating the requirements of SEA and SA into one process whilst the London Plan recommends incorporating HIA with this process. It is therefore logical to carry out an IIA process as an effective means of avoiding duplication of assessment work and benefiting from a shared understanding of policies.

A Habitats Regulations Assessment Screening Report has also been undertaken as a parallel process.

1.2 Local Plan and IIA process so far

The five main stages in conducting an IIA are defined as:

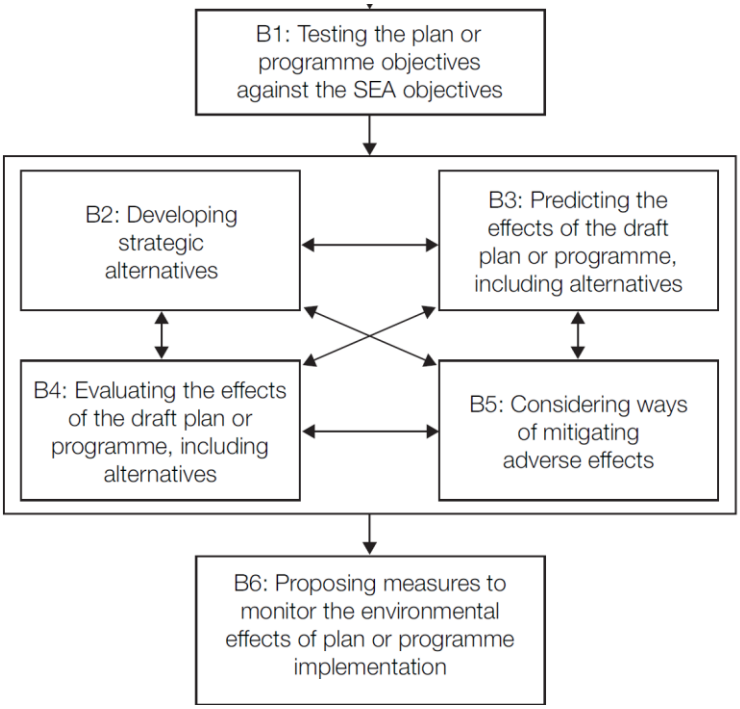
- Stage A - setting the context and objectives, establishing the baseline and deciding on the scope;
- Stage B - developing and refining options and assessing effects;
- Stage C - preparing the Sustainability Appraisal Report;
- Stage D - consulting on the preferred option of the development plan and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

In accordance with regulation 12(5) of the SEA Regulations, the (Stage A) Scoping Report[3] was consulted upon for a five-week period, commencing in September 2015.

Stage B of the SEA process, is focussed on 'Developing, refining and appraising strategic options, policy options and preferred policy options'. The following extract tom the SEA Practical Guide (page 25) presents the tasks within Stage B, and their interrelationships:

[1] https://www.gov.uk/guidance/health-and-wellbeing
[2] https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-3/policy-32-improving-health
[3] https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-op-4

Stage B: Developing and refining alternatives and assessing effects



Section 3.4 of the Regulation 19(2) IIA Report states that the Report is the second part of Stage B. This is because the Interim IIA Report4 that accompanied Regulation 18 consultation on the OPDC Local Plan was the first iteration of Stage B.

The Regulation 18 IIA Report included the B1 (testing the plan or programme objectives against the IIA objectives) and B2 assessments (developing strategic alternatives) (where reasonable alternatives exist – see section 2.4 of this report), including assessment of the proposed policy options (Appendix G of the Regulation 18 IIA Report, appended to this addendum). Further information on the options and the reasons for selecting them and the choices for the preferred options are also provided in section 2.4 of this report.

Both the Regulation 19 (1)5 and (2)6 IIA Reports tested plan policies and predicted effects, making recommendations for mitigation and enhancements, in order to help develop and refine the plan policies (Stages B3/4/5). The reports also proposed measures by which to monitor predicted effects (Stage B6).

The three reports together comprise Stage B of the IIA process for the OPDC Plan, reflecting the iterative nature of the assessment process. The narratives on each of the assessments are provided within each of the reports.

Consultation and decision-making comprise Stage D of the process. OPDC carried out the first consultation on the Regulation 18 draft Local Plan and its supporting evidence base documents between 4 February and 31 March 2016. Consultation responses received were then documented and integrated, as appropriate, into the next iteration of the Local Plan and the IIA.

The next consultation was carried out on the first Regulation 19 revised draft Local Plan from 29 June until 11 September 2017. Responses to both of these consultations informed the second Regulation 19 revised draft Local Plan, and its associated new and updated supporting studies, which was consulted on from 14 June to 30 July 2018. The consultation responses relevant to the IIA Report are document in Appendix C of the Regulation 19(2) IIA Report.

On 4 October 2018 the Local Plan was submitted to the Planning Inspectorate for independent examination - the final stage of creating a Local Plan.

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[4] https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_iia_report_new_cover.pdf
[5] https://www.london.gov.uk/sites/default/files/27._integrated_impact_assessment_1.pdf
[6] https://www.london.gov.uk/sites/default/files/28._iia_and_hra.pdf

At each stage of the Local Plan making process an IIA report has accompanied the consultation in order to provide information on the sustainability effects of the Plan, its proposals and reasonable alternatives to these proposals. The IIA process commenced with a Scoping consultation in September 2015 which determined an appropriate scope and level of detail for the IIA process. Consultation responses as a result of this were integrated into the Draft IIA Report prepared for the Regulation 18 Local Plan consultation. Responses received during the Regulation 18 consultation in 2016 were taken into consideration during the preparation of the interim IIA report that accompanied the Regulation 19(1) consultation in 2017. Responses received during this consultation then informed the Regulation 19(2) version of the IIA report finalised in June 2018. Appendix C to the respective Regulation 19 IIA reports contains the consultation responses to the Draft IIA reports and how they have been addressed.

The Proposed Submission Local Plan must be considered by a formal Independent Examination. This is led by an independent Planning Inspector appointed by the Secretary of State for the Ministry of Housing, Communities and Local Government (MHCLG). The independent examination is the final stage in the Local Plan process before it can be adopted following which it will form part of the statutory development plan for the area. The Planning Inspectorate, on behalf of the Secretary of State, has appointed Paul Clark MA MRTPI MCMI as the Planning Inspector. Hearing sessions were undertaken in April 2019. Parts of this Addendum include direct responses to the Inspector's queries, requesting further information on the IIA process. These were:

Inspector's Questions for the IIA	Response
Question 29	
• The matrix referred to in the fifth paragraph of section 3.4 of the report; "Overarching strategic options were assessed ahead of the drafting of the Regulation 18 Local Plan. The purpose of the assessment was to determine the sustainability strengths and weaknesses of each option, such that this information would be used by the plan-makers to develop the plan's policy options and preferred policies (section 6.3). The preferred policies and policy options were then assessed alongside one another in detail, which enabled a comparison of their predicted sustainability effects, to inform the development of the preferred policies. A matrix was used for this assessment enabling the policies and options to be easily compared."	The SA of reasonable strategic alternatives is included in section 5 and Appendix E of the Reg19(2) IIA Report. Further information regarding the scope of reasonable alternatives is provided in Section 3 of the IIA Report. Note comments in section 2.4 of this document below regarding the scope of reasonable alternatives. Appendix G of the Interim IIA Report that accompanied Regulation 18 consultation on the OPDC Local Plan presents the Matrix of assessments for Local Plan policies alongside policy options, where these were considered to be reasonable. This appendix has been appended to this addendum for clarity (see Appendix 1).
• A narrative of the first part of stage B of the SEA process described in the seventh paragraph of section 3.4 of the report; "This report documents the second part of Stage B of the SEA process and represents Stage C and D of the SA Process. This IIA Report, is being published alongside the Regulation 19(2) Second Revised Draft Local Plan".	Further information and clarity regarding this process has been included in Section 1.2 of this Addendum.
Question 30	
• The last two columns in the table headed SEA Compliance Policy Recommendations following Appendix F in the submitted copy of Submission Document SD2 are blank. May I be provided with a copy with those last two columns completed, please?	This has been included in Section 4 of this Addendum.

1.3 Purpose of this addendum

As laid out in Section 1.2, the IIA process accompanying the Plan-making process has taken many years and involved the preparation of numerous reports. The IIA incorporates the requirements of numerous impact assessments including SA, SEA, HIA and EqIA. In particular, there are a range of requirements that should be met for an IIA report to adequately satisfy the requirements of SA and an SEA 'Environmental Report'.

The purpose of this Addendum is to provide further clarity over how the Local Plan, its accompanying IIA process and the Regulation 19(2) IIA report meet and in certain aspects exceed the minimum requirements of SA and SEA.

1.4 Planning hierarchy

The OPDC Local Plan will play an integral role in guiding and managing development in the Old Oak and Park Royal area. The plan sits within an hierarcy, within which there are other development plan documents forming part of the development plan.

The Planning and Compulsory Purchase Act 2004[7], Part 19 (2) sets out that '*In preparing a local development document the local planning authority must have regard to… (c) the spatial development strategy if the authority are a London borough or if any part of the authority's area adjoins Greater London.*'

Part 3 (38) (2) 'Development plan' sets out that '*for the purposes of any area in Greater London the development plan is: a) the spatial development strategy; and (b) the development plan documents (taken as a whole) which have been adopted or approved in relation to that area*.'

In addition section 24(1)(b) of the Planning and Compulsory Purchase Act 2004 states that *"The local development documents must be in general conformity with-...(b) the spatial development strategy (if the local planning authority are a London borough or a Mayoral development corporation*"

Therefore, future development in the Old Oak and Park Royal area needs to be in general conformity with the requirements set out in the London Plan.

The current Mayor of London's London Plan was first published in 2011[8]. Revised Early Minor Alterations (REMA) were published in October 2013[9]. In 2015, the Further Alterations to the London Plan (FALP) was published, which in 2016 underwent minor alterations to the its housing and parking standards[10]. The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the coming 20–25 years.

The London Plan identifies various Opportunity Areas in London for development, including the Old Oak and Park Royal Opportunity Areas. To provide further planning guidance for development in the Old Oak and Park Royal Opportunity Areas, an Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) was produced by the Greater London Authority with inputs from the London Boroughs of Brent, Ealing, Hammersmith and Fulham and Transport for London. The OAPF was adopted on 4 November 2015 as Supplementary Planning Guidance to the London Plan.

Both the London Plan and the OAPF were developed through thorough preparation processes involving numerous background studies and public consultation at multiple stages, including IIA. The London Plan underwent an Examination in Public and the adopted London Plan was determined to be sound.

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[7] Available online at: http://www.legislation.gov.uk/ukpga/2004/5/pdfs/ukpga_20040005_en.pdf [Accessed 20.03.19]
[8] Available online at: https://www.london.gov.uk/what-we-do/planning/london-plan/past-versions-and-alterations-london-plan/london-plan-2011 [Accessed 20.03.19]
[9] Available online at: https://www.london.gov.uk/what-we-do/planning/london-plan/past-versions-and-alterations-london-plan/revised-early-minor [Accessed 20.03.19]
[10] Available online at: https://www.london.gov.uk/sites/default/files/the_london_plan_malp_final_for_web_0606_0.pdf [Accessed 20.03.19]

Both the FALP[11] and the OAPF[12], were subject to their own IIA processes and reports, which were also consulted on and which culminated in IIA Reports that satisfied the requirements of a SEA Environmental Report.

The spatial strategy and quantum of housing and employment land for the Old Oak and Park Royal area have been determined by the London Plan and alternatives were tested appropriately as part of the preparation of that plan. Consequently, the assessment of an alternative spatial development strategy which would involve less development than that set out in the London Plan for the Old Oak and Park Royal area would not constitute a 'reasonable alternative' and hence there is no need for it to be assessed as an alternative strategy. Extracts from the relevant law and case law that support this approach are set out below:

SEA Directive Article 4(3):
"Where plans and programmes form part of a hierarchy, Member States shall, with a view to avoiding duplication of the assessment, take into account the fact that the assessment will be carried out, in accordance with this Directive, at different levels of the hierarchy. For the purpose of, inter alia, avoiding duplication of assessment, Member States shall apply Article 5(2) and (3)."

Regulation 12 of the 2004 SEA Regulations:
"12.— Preparation of environmental report…
3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of–
(a) current knowledge and methods of assessment;
(b) the contents and level of detail in the plan or programme;
(c) the stage of the plan or programme in the decision-making process; and
(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment."

The consequences of Regulation 12(3)(d) can clearly be seen from Beatson J's decision in the case of Shadwell Estates Ltd v Breckland DC [2013] EWHC 12. In that case, the claimant's challenge to an area action plan failed inter alia because the accompanying sustainability appraisal was not required to duplicate work done in relation to the higher tier core strategy with which the area action plan had to conform. The judgement states as follows:

"81. First, the sustainability appraisal was required to assess the likely significant effects on the environment of implementing the TAAP and reasonable alternatives. The Regulations make it clear that the information required is that which may "reasonably be required" taking account inter alia of the need "to avoid duplication of the assessment": EAPPR 2004, regulation 12(3)(d). The sustainability appraisal, strategic environmental assessment and Habitats Regulations assessment for the Core Strategy had not been challenged and were supported by Natural England and the RSPB. Those assessments led to the decision to adopt the orange and blue buffer zones in the designated areas. Shadwell's current position appears to be that the buffer zones should be altered either by including Kilverstone in the orange zone or by including it or part of it in the blue zone. But since the TAAP is required to conform to the Core Strategy, it is difficult to see how it would be possible to alter the buffer zones."

[11] Further Alterations to the London Plan, Integrated Impact Assessment, Amec, December 2013. Available online at: https://www.london.gov.uk/file/15565/download?token=xVzX_5zA [Accessed 20.03.19]
[12] Old Oak and Park Royal Opportunity Area Planning Framework (OAPF), Integrated Impact Assessment (IIA), November 2015, Prepared by Greater London Authority

2 Requirements from the London Plan and the OAPF

2.1 Background

The purpose of this chapter is to show that the spatial strategy and minimum targets for housing and jobs for inclusion in the OPDC Local Plan were set in accordance with the requirements of the London Plan and the OAPF. As the London Plan and OAPF underwent their own consultation exercises and were accompanied by their own distinct IIA processes, the IIA accompanying the OPDC Local Plan is not required to assess, as a reasonable alternative, a spatial development strategy which would plan for less development than is required for this opportunity area by the London Plan.

2.2 Quantity of development

Within the London Plan, a development capacity for a minimum of 25,500 new homes and 65,000 jobs are identified for the Old Oak and Park Royal Opportunity Areas comprising the OPDC area. Policy 2.13 'Opportunity Areas and Intensification Areas' on Page 65 of the London Plan states (our emphasis) *"Development proposals within opportunity areas and intensifications areas should: c Contribute towards meeting (or where appropriate), exceeding the minimum guidelines for housing and/or estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks."*

In response to the allocated quantity of development, OPDC gathered various evidence documents to appropriately test the quantity of development the Local Plan should seek to deliver but taking into account that the quantum of housing delivery is clearly stated to be a minimum. This was on the basis that to test for delivery of housing numbers below that stated in the London Plan would not result in the OPDC Local Plan being in general conformity with the London Plan. The evidence that was produced included but was not limited to the following documents which are available on the OPDC's Second Regulation 19 Supporting Studies page[13]:

- Development Capacity Study (DCS), 2018;
- Development Infrastructure Funding Study (DIFS), 2015;
- Retail and Leisure Needs Study (RLNS) and Addendum, 2016 and 2018;
- Industrial Land Review and Addendum, 2017 and 2018;
- Strategic Housing Market Assessment (SHMA), Report of Findings, 2016;
- Gypsy and Travellers Accommodation Needs Assessment, 2016;
- Old Oak North Development Framework Principles, 2018
- Old Oak Strategic Transport Study, 2015;
- Park Royal Development Framework Principles, 2018
- Park Royal Transport Strategy, 2016; and
- Public Realm, Walking and Cycling Strategy, 2017.
- Scrubs Lane Development Framework Principles, 2017
- Victoria Road and Old Oak Lane Development Framework Principles, 2017

In having regard to the minimum targets set by the London Plan, the evidence base gathered by the OPDC enabled the authority to determine how much development is required, the extent to which this development could be accommodated, and the interventions that may be required in order to do so.

Within the Regulation 18 DCS, the appropriate testing process calculated the minimum residential density required to deliver 25,500 homes across the available areas for residential development, based on the emerging illustrative masterplan for Old Oak, set out in the OAPF. Paragraphs 2.8 and 2.9 state: '*This would require a density of 447 units per hectare to be delivered across all areas identified suitable for housing. However, this approach would not be compliant with London Plan policy 2.13 which seeks development to*

[13] The listed Supporting Studies, and more, are publicly available online at https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/opdc-local-plan/previous-versions-local-plan/second-revised-draft-local-plan/reg-19-supporting-studies-other-documents [Accessed 26.03.19]

respond to opportunities presented by public transport access improvements and constraints generated by sensitive locations within a local context.'

The testing process also sought to ensure that the development quanta approach accords with London Plan Policy in terms of distributing residential density across the plan area while responding to sensitive locations, public transport improvements, other key destinations and new residential areas.

The Regulation 19(1) and 19(2) DCS documents continued this methodology in accordance with the PPG guidance for Housing and Economic Lane Availability Assessments. The result of this exercise of rigorously testing the residential development quanta dictated by the London Plan was to revise the proposed housing figure within the Local Plan for the OPDC area from 22,350 new homes within the Regulation 19(1) Local Plan to 20,100 homes over the Plan period to 2038 within the Regulation 19(2) Local Plan. 26,500 new homes would be delivered across the full development period which is expected to be until the late 2040s.

The Development Capacity Study also considered and tested the economic floorspace required, in line with the London Plan indicative employment capacity figure. The result of this exercise of rigorously testing the economic floorspace development quanta dictated by the London Plan was to revise the proposed jobs figure within the Local Plan for the OPDC area from 67,000 new jobs within the Regulation 19(1) Local Plan to 40,400 new jobs over the Plan period to 2038. 60,700 new jobs would be delivered across the full development period.

2.3 Spatial distribution of development

The London Plan identifies Park Royal and Old Oak Common as two Opportunity Areas and identifies minimum targets for new housing development. The London Plan includes a range of other policy requirements for development planning in the OPDC area. Planning requirements for the Old Oak and Park Royal area set out in Table A1.1 of the London Plan are repeated in **Boxes 2.1** and **2.2**.

Box 2.1: Park Royal Opportunity Area – requirements for planning in the area from the London Plan

Area (Ha): 713
Indicative employment capacity: 10,000
Minimum new homes: 1,500
OAPF progress: 2
Park Royal is one of London's key industrial locations, with potential to meet modern logistics and waste management requirements as well as other industrial type functions. A range of opportunities exist for industrial related development and in selected locations outside of SIL for mixed use intensification where there is good public transport accessibility. These selected locations include a series of 'gateway' sites identified in the Park Royal OAPF comprising the Eastern Gateway at Willesden Junction, the Southern Gateway around North Acton station, the Western gateway around the Diageo First Central site and the Northern Gateway centred around the Northfields industrial estate. Development should take account of London's future rail and water freight requirements and their land use implications, and the scope for improvements in strategic rail accessibility. Planning for Park Royal should be integrated with Old Oak Common and take into account the relationships with White City and Kensal Canalside

Box 2.2: Old Oak Opportunity Area – requirements for planning in the area from the London Plan

(Ha): 155
Indicative employment capacity: 55,000
Minimum new homes: 24,000
OAPF progress: 2
Old Oak Common has significant regeneration potential for new housing and jobs and could make a major contribution to London's position as a world business centre. Regeneration would centre on a new strategic public transport infrastructure hub at Old Oak Common on the HS2 line between London, and Birmingham and beyond with an interchange with Crossrail 1, other national main lines and the London Overground. This should include a new branch of Crossrail 1 linking from Old Oak to the West Coast Main Line and extending via Wembley to Watford and potentially beyond. Provision of public transport infrastructure on this scale would drive substantial development which could yield 24,000 new homes and, subject to capacity and demand, up to 55,000 jobs and a variety of complementary and supporting uses in a commercial hub around the station and in the wider area. The potential for a network of new open spaces and green links connecting Old Oak Common station to North Acton, Willesden Junction, Wormwood Scrubs and the Grand Union Canal should be investigated. Public transport accessibility and availability of amenity space should support high density development which could include a cluster of tall buildings around the interchange. Wormwood Scrubs would provide a major amenity to support this scale of development and improved access to the Scrubs is essential to deliver sustainable residential communities. Planning for Old Oak Common should be integrated with the wider Park Royal Opportunity Area, including scope for business relocations. Linkages with Kensal Canalside and White City Opportunity Areas should also be considered, including the Imperial College campus expansion and associated potential for business creation and development at Old Oak/Park Royal. A vision document for Old Oak was published in June 2013 setting out a direction of travel for the future development of the area.

In addition to the London Plan, the OAPF provides further detail on the requirements for planning in the OPDC area in relation to the spatial distribution of development. The OAPF reviewed the geographic distribution of existing land-uses in the OPDC area and sets out the Land Use Strategy Principles for development in the OPDC area, which are comprised of three principal components (see **Box 2.3** – **2.5**). Principles L1, L2 and L3 are illustrated in **Figure 2.1**.

Box 2.3: Principle L1 - Old Oak

The core development area is focussed at Old Oak (see figure 17). This area should be redeveloped as a sustainable and healthy mixed-use part of west London. In conformity with the London Plan this new urban quarter should be comprehensively redeveloped to accommodate a minimum of 24,000 new homes, and 55,000 jobs. To achieve this, there will be a requirement for significant new transport, utility and social infrastructure provision to meet the requirements of the future population. OPDC will, through it's Local Plan, carry out work to further consider the deliverable quantum of development. In accordance with Policy 2.17Bb of the London Plan, it is proposed that SIL is consolidated into the Park Royal as shown in figure 17. The official de-designation process for SIL in Old Oak would be dealt with through OPDC's Local Plan. Requirements for replacement of any resultant loss of SIL should be considered at a strategic level. Old Oak will require a mix of town centre uses. These should primarily be clustered around Old Oak Common Station, around other transport hubs and along Old Oak High Street. There may be opportunities to locate town centre uses in other locations but only where there prove to be large flows of people. Hotels, specifically those supporting business tourism, will be promoted to contribute to London's competitiveness. Central to Old Oak's success will be clear connections into its surroundings so that Old Oak is knitted into the local area. The GLA will work with OPDC and the boroughs to develop appropriate mechanisms to achieve this aspiration. There is also a need to create a network of new streets and new amenity spaces within and across Old Oak, along the Grand Union Canal and to Wormwood Scrubs to ensure these places become integral parts of this network. Within Old Oak there is an opportunity to attract a variety of catalyst uses, from the small to the large scale, which should help play a role in attracting people to the area and creating a destination. Additionally, there are opportunities created by Old Oak's proximity to existing and emerging employment growth sectors generated at the Imperial College White City campus. Old Oak and Park Royal could accommodate the delivery of scaleup workspace in helping to develop both locations as leading smart technology clusters.

Box 2.4: Principle L2 - Park Royal

Park Royal performs a vital role in supporting the London economy. Building on the area's existing success there is a fantastic opportunity for Park Royal to become the UK's leading industrial location. Park Royal could establish itself as a globally recognised centre for developing innovations such as smart and clean-tech industries. There are also opportunities to attract growing businesses from Imperial College Campus into Park Royal. This can be achieved by; continuing to protect Park Royal as a Strategic Industrial Location (SIL); identifying interventions to improve transport and utility (including connectivity) infrastructure; managing impacts generated during and after the redevelopment of Old Oak; and developing planning and design policies that encourage development that makes more efficient use of land and that works to attract different sectors to the area through the OPDC Local Plan. Today Park Royal houses approximately 1,200 workspaces, employing over 30,000 people in over 2.3 million square metres of gross floor area. The area's historical development has seen changes in the types and form of businesses. During the life of this plan there is a need to improve the operation of the estate and where possible to intensify uses to cater for up to 10,000 new jobs. Given the timescales involved what is most important now is the development of a place that functions well, and which is an attractive business location. Whilst there may be opportunities to support and promote the location of specific business sectors, it is important to retain flexibility to ensure Park Royal can evolve to changing market demands in a timely manner. Park Royal could also play a valuable role in accommodating displaced employment floorspace and businesses from Old Oak. Outside of SIL, development should be more mixed use, and should look to deliver a minimum of 1,500 homes. In the centre of Park Royal, the existing retail centre should be enhanced and expanded so that it can become a local hub for residents and businesses in Park Royal to include business support services and uses such as meeting spaces and business hotels. The existing character of the Wesley Estate and the nearby playing fields should be enhanced with the Heart of Park Royal reinvigorated to provide a range of services for local communities.

Box 2.5: Principle L3 - Wormwood Scrubs

Continue the protection of Wormwood Scrubs as a valuable amenity and ecological space for Londoners and its wildlife, coupled with improved access and sensitive enhancements where appropriate. Wormwood Scrubs is located between Old Oak and White City. Improved access to the Scrubs would provide people with the opportunity to enjoy this space and would also help to improve connectivity between both places. OPDC will undertake a study of Wormwood Scrubs and any proposals would be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and discussed with the local community Park Royal could also play a valuable role in accommodating displaced employment floorspace and businesses from Old Oak.

Figure 2.1: *Figure 17 from the OAPF providing an illustrative summary of Principles L1, L2 and L3*

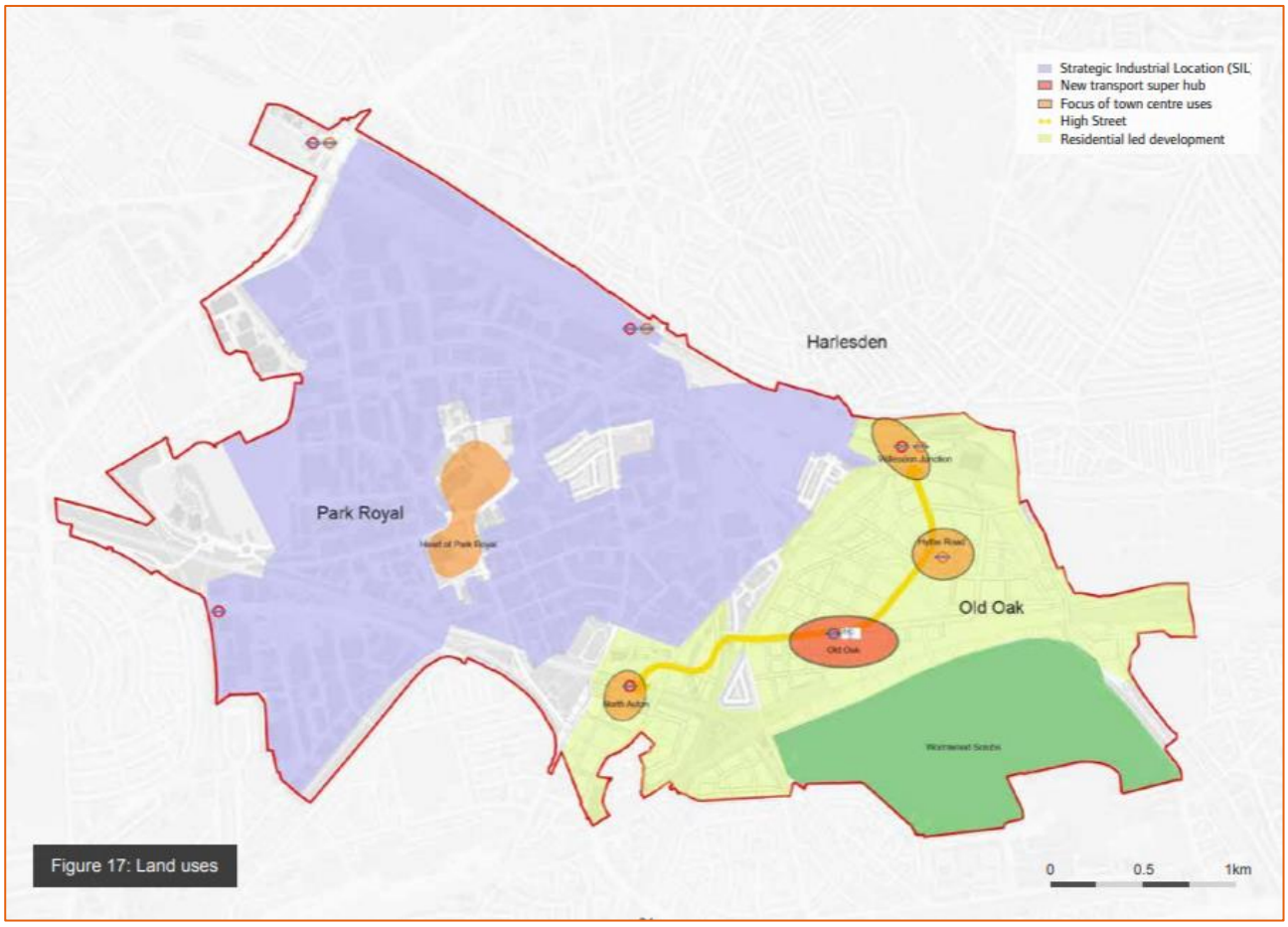


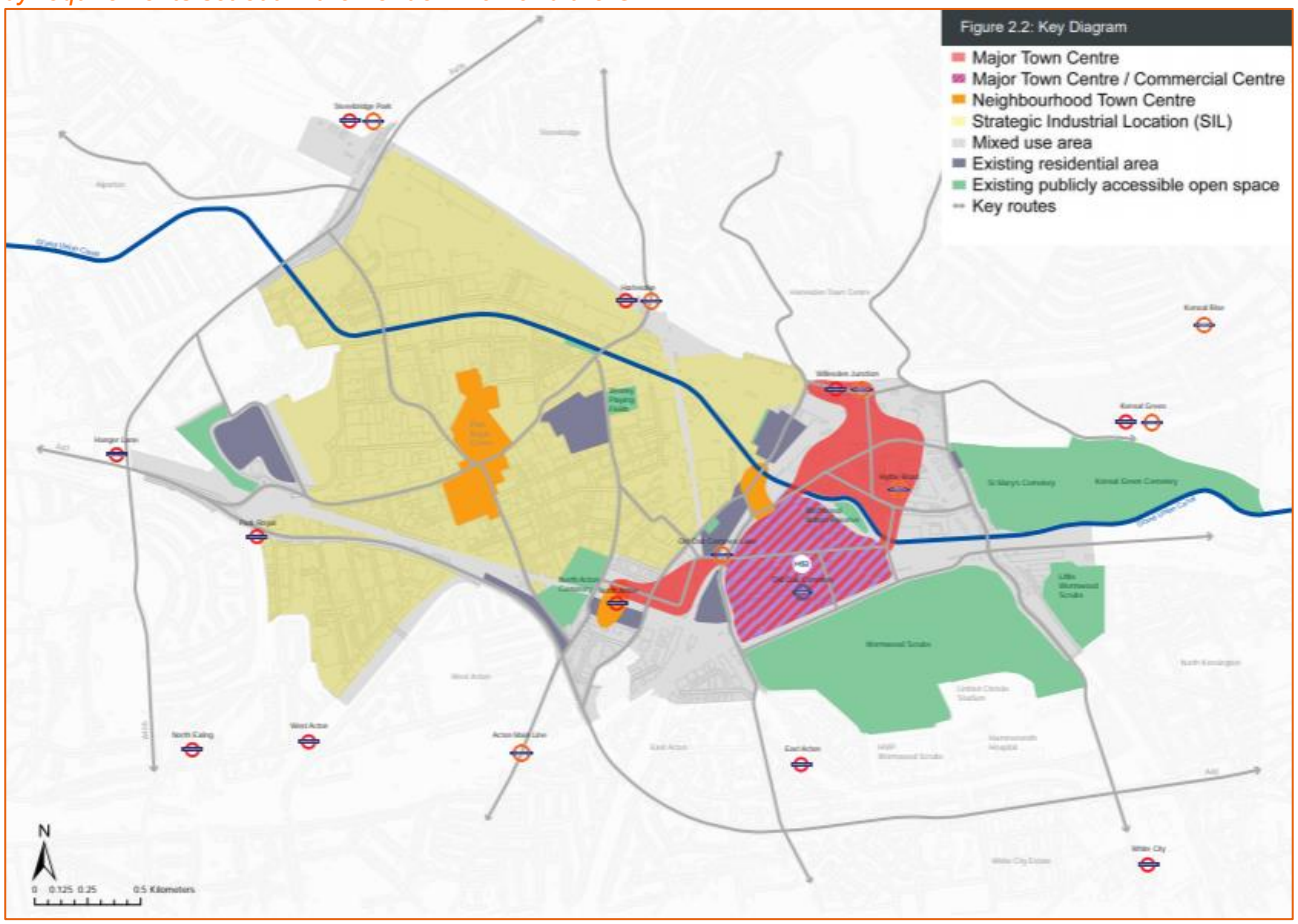
Figure 17: Land uses

In addition to Land Use Strategy principles, the OAPF also provides:

- Design strategy;
- Old Oak Strategy;
- Park Royal Strategy;
- Wormwood Scrubs Strategy;
- Transport Strategy;
- Environment Strategy; and
- Delivery Strategy.

Combined, the London Plan and the OAPF provide detailed requirements on the quantity of development that should be delivered through the OPDC Local Plan, its spatial distribution and various other planning policy requirements. OPDC considered these requirements carefully alongside considerations such as open spaces, industrial land, sensitive locations and the importance of sustainability. This consideration resulted in the Spatial Vision described in Chapter 2 of the Local Plan and summarised in **Figure 2.2**.

Figure 2.2: *Illustrative summary of the Spatial Vision for the OPDC Local Plan, which has been determined by requirements set out in the London Plan and the OAPF*



2.4 Reasonable alternatives to requirements from the London Plan and the OAPF

2.4.1 Requirement to consider reasonable alternatives

Box 2.7: SEA Regulations Schedule 2, paragraph 8

… an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Box 2.6: SEA Directive Art. 5(1)

Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.

For the purpose of satisfying the requirements of an SEA Environmental Report, it is necessary for the IIA report to identify and evaluate the environmental effects of proposals in the Local Plan, alongside the identification and evaluation of environmental effects of reasonable alternatives to these proposals. The purpose of assessing reasonable alternatives is to demonstrate how the chosen plan has been arrived at when compared to the reasonable alternatives.

Determining if an alternative is reasonable is a matter of evaluative and qualitative assessment by the planning authority, i.e. it is a matter of planning judgment. SEA Guidance[14] states that "only reasonable, realistic and relevant alternatives need to be put forward". The SEA Directive and associated legislation do not define what constitutes a reasonable alternative, or how many alternatives must be considered. Reasonableness in the context of considering "reasonable alternatives" is informed by the objectives sought to be achieved by the Local Plan. An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan is not a "reasonable alternative" (case of R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] EWHC 776 (Admin)).

OPDC is under a legal duty to have regard to the London Plan in preparing its Local Plan (section 19(2) of the Planning and Compulsory Purchase Act 2004) and must be in general conformity with the London Plan (section 24(1)(b) of the Planning and Compulsory Purchase Act 2004). Therefore, the potential to consider alternatives associated with the scale and location of housing and employment is limited and the assessment of an option to deliver less housing than the London Plan's stated minimum would not be a reasonable alternative because to do so would not meet a key legal requirement of the Local Plan which is to be in general conformity with the London Plan.

This approach is corroborated by the approach recently taken in IIAs of Local Plans for other London boroughs, including the London Borough of Hounslow. The Planning Inspectorate 'Report to the Council of the London Borough of Hounslow', dated 31st July 2015[15] (Paragraph 37) states:

"London has a two-tier planning system in which the London Plan and the Local Plan are both part of the Development Plan. The London Plan sets out the broad strategy for the city as well as some more detailed provisions. It includes key policy requirements and the Local Plan is required to be in general conformity with it. This limits the scope for the consideration of alternative strategies on matters such as: the supply of housing (for which the London Plan sets a target for the Borough); the location of employment (for which the London Plan identifies some locations and employment types to be provided or protected); and the hierarchy of town centres…"

Paragraph 39 then states:

"For these reasons the preparation of the Local Plan and the requisite sustainability appraisal explicitly only explored policy options where the opportunity for proposing reasonable alternatives to national and regional policy existed, whether to meet local objectives or to respond to local distinctiveness. It could not explore policy options in respect of major development decisions that would have been in direct conflict with national and regional policy…and it would not avoid making provision for the housing requirement identified for the Borough in the London Plan."

Targets for growth set out in the London Plan for the OPDC area are based on an assessment of the anticipated capacity of sites in the OPDC area identified in the Strategic Housing Land Availability Assessment for London[16]. There is considered to be no scope for considering spatial options associated with the development of different sites, because all potential viable sites have been identified and are already included within the OPDC Local Plan.

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[14] Office of Deputy Prime Minister (2005), A Practical Guide to the Strategic Environmental Assessment Directive Practical guidance on applying European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

[15] Inspector's comments are available online at: https://hounslow.app.box.com/v/InspRep [Accessed 28.03.19]

[16] London SHLAA is available online at: https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/strategic-housing-land-availability-assessment [Accessed 26.03.19]

2.4.2 Strategic Options

The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified that the preferred option was to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. The Old Oak and Park Royal Opportunity Areas are referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the Greater London Authority (GLA) developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015 and was subject to an IIA. The current London Plan (2016) and the Draft New London Plan (2017) also continue to set out these homes and jobs targets.

These development capacities were appropriately tested further through OPDC's Local Plan evidence base including the various Development Framework Principles documents and the Development Capacity Study[17]. Section 2.2 of this Addendum further explains how the London Plan and OAPF have determined the quantity of development, to be delivered through the OPDC Local Plan.

Section 2.3 of this Addendum shows how the spatial strategy adopted in the Local Plan needs to conform with requirements in the London Plan which limits the scope for the selection and assessment of reasonable alternatives.

The OPDC Local Plan therefore proposes the only approach available in terms of quantity and spatial distribution of development i.e. the approach that conforms with key requirements from the London Plan, i.e. the stated minimum number of new homes that must be delivered in the Old Oak and Park Royal Opportunity Areas. An approach that did not conform with these requirements would not be sound and would not be in accordance with the relevant legal requirements set out in the Planning and Compulsory Purchase Act 2004.

A 'business as usual' or 'no plan' approach would not constitute a 'reasonable alternative' for the purposes of the SEA. The Mayor of London established the OPDC on 1 April 2015 as a 'Mayoral Development Corporation' in order for the OPDC to act as the local planning authority for the OPDC area and to produce a Local Plan in order to enable the transformation of the area and the delivery of new housing and commercial development. The need for the OPDC Local Plan is well established and a 'business as usual' approach, or a 'no Local Plan' approach, would clearly not qualify as a 'reasonable alternative' because it would in no way achieve the stated aims of the London Plan and so it would be inappropriate for the IIA to evaluate the environmental effects of 'business as usual' or 'no plan' as an alternative to the preferred strategy.

In R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] Env LR 1, Hickinbottom J summarised the law relating to reasonable alternatives:

"iv) "Reasonable alternatives" does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.
v) Article 5(1) refers to "reasonable alternatives taking into account the objectives… of the plan or programme… " (emphasis added). "Reasonableness" in this context is informed by the objectives sought to be achieved. An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". An option which will, or sensibly may, achieve the objectives is a "reasonable alternative". The SEA Directive admits to the possibility of there being no such alternatives in a particular case: if only one option is assessed as meeting the objectives, there will be no "reasonable alternatives" to it.
vi) The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority

[17] https://www.london.gov.uk/sites/default/files/opdc_development_capacity_study.pdf

rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process."

The fact that no reasonable alternatives to the quantity of development or spatial strategy proposed in the OPDC Local Plan were available is mitigated by the fact that during the preparation of the London Plan and the OAPF, alternatives were considered and appraised in the IIAs accompanying them. The reasonable alternatives tested in the IIA accompanying the London Plan that are relevant to the OPDC Local Plan include, but are not limited to, those presented in **Table 2.1**.

Reasonable alternatives were also tested during the preparation of the OAPF, including reasonable alternatives for:

- Need/demand for development;
- Intensity of development;
- Location of development;
- Timing of development (i.e. differently phases approaches); and
- Details on the development's implementation.

Reasonable alternatives to the preferred strategy in terms of quantity and location of development have been tested during the preparation of the London Plan and the OAPF which ensures that the development proposals in the OPDC Local Plan are sustainable and evidence-based, because these key decisions have been assessed and agreed, as against reasonable alternatives, at a higher level in the hierarchy of plans (see Article 4(3) of the SEA Directive).

Table 2.1: Reasonable alternatives considered in the October 2009 Integrated Impact Assessment full report of the replacement London Plan (aka FALP)[18]

Location in the IIA	Alternative dealt with relevant to the OPDC Local Plan	Comments
5.1.3 Strategic Spatial Options	Three strategic spatial development options were developed and considered in the London Plan Review process to help guide policy development. • Strategic Spatial Development Option 1: No change, business as usual scenario • Strategic Spatial Development Option 2: Current London Plan direction plus enhanced growth in metropolitan town centres • Strategic Spatial Development Option 3: Current London Plan direction plus enhanced growth in new Strategic Outer London Development Centres	The assessment highlights that generally, of the options considered here the second is likely to contribute most towards meeting the IIA objectives. This is predominantly due to the fact that it builds upon the existing London Plan's focus on inner London and promotes an improved distribution of development in outer London by focussing on enhancing growth at metropolitan town centres.
6.1.3 Housing Target Options	Three options relating to annual housing growth were considered for assessment purposes: • Housing Option 1: Current Plan Housing Targets – 30,500 homes • Housing Option 2: Increased Housing Target – 33,380 homes • Housing Option 3: Increased Housing Provision – 41,154 homes	The assessment of the housing growth options highlights that Option 2 is likely to be most sustainable as it provides the enhanced benefits arising from additional housing beyond that of Option 1, without the exacerbated effects associated with the greater provision of housing and higher densities associated with Option 3.

OPDC were committed to the ensuring that reasonable alternatives were considered, within the context within which the Local Plan sits. As such, four different approaches to affordable housing were appraised for their likely effects on the IIA Framework in Section 5.1 of the Reg 19(2) IIA Report. The report presented the following summary of this appraisal:

[18] Entec (2009) on behalf of the GLA, Integrated Impact Assessment full report of the replacement London Plan, available online at: https://www.london.gov.uk/sites/default/files/iia_report_oct_09.pdf

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

In addition to reasonable alternatives for the Affordable Housing strategic policy, OPDC also considered an extensive range of reasonable alternatives to the preferred policies.

For some policies in the OPDC Local Plan, it was considered that there were no reasonable alternatives available because the Local Plan is required to be in general conformity with the London Plan. However, reasonable alternatives were identified for 29 of the policies in the Local Plan, which are presented in **Table 2.2**.

Each of the reasonable alternatives for policies listed in Table 2.2 were appraised in the IIA. The full results of these appraisals are presented in Appendix G of the IIA report accompanying the Regulation 18 consultation on the OPDC Plan[19].

[19] Integrated Impact Assessment (including Habitats Regulation Assessment Screening) Appendices, Local Plan Supporting Study, Draft for Regulation 18 Consultation, 4 February 2016. Available online at: https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan_draft_iia_report_appendices_new_cover.pdf [accessed 20.03.19]

Table 2.2: *Reasonable alternatives to policies proposed in the OPDC Local Plan. For the full versions of the policies, see the Regulation 18 version of the Local Plan*[20]

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
D5: Alterations and extensions	1. Guidance is not provided for alterations, extensions and shopfronts.	n/a	To support the delivery of a high quality built environment.
D7: Amenity	1. London Plan policies are used to manage amenity	n/a	To recognise specific requirements of high density development in delivering an appropriate standard of amenity.
H2: Housing supply	1. Seek to deliver a higher number of new homes within the Local Plan period.	n/a	For the Local Plan period, the Local Plan does not provide targets greater than those defined in the London Plan based on testing set out in the Development Capacity Study. However, policy SP10 seeks to ensure that an optimised and comprehensive approach is taken to the development of site allocations so that targets can be met or exceeded. This reflects London Plan policy 2.13(B)(c).
H3: Housing mix	1. Allow a proportion of new housing (micro-housing) to not comply with London Plan space standards or Building Regulations M4(2) and M4(3)	n/a	To ensure that new homes will have adequately sized rooms and efficient room layouts which are functional and fit for purpose.
H5: Existing housing	1. Take a more flexible approach to the loss of existing stock. 2. Allow the conversion of smaller family sized units and not require a proportion of these to be replaced as family homes	n/a	1. To ensure the loss of existing housing stock to other uses does not undermine the overall housing supply. 2. To prevent the loss of much needed family sized units.
H6: Housing in the Private Rented Sector	1. Make it mandatory for PRS proposals to sign up to London Rental Scheme (LRS)	n/a	Following the change in Mayor, this proposal was no longer sought.

[20] Available online at: https://www.london.gov.uk/sites/default/files/opdc_draft_local_plan.pdf

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
H7: Housing with shared facilities	1. Encourage the conversion or loss of shared housing without replacing it.	n/a	Policy H7 was amended to provide criteria to manage the conversion or loss of existing shared housing to ensure that appropriate shared housing was not removed from the market.
H10: Student accommodation	1. Require student housing proposals to be linked to specified educational institutions	To help to demonstrate there is a local or London-wide supply and ensure the accommodation will be supporting London's higher education institutions.	
E2: Old Oak	1. Support for focusing B1(a) uses in and around Old Oak Common Station is not provided. 2. Support for B1(b) and B1(c) uses in Old Oak north is not provided.	n/a	1. To support the development of a commercial centre in Old Oak South. 2. Specific support for B1(b) uses is not provided in policy P2; however, a range of B1 uses are supported within Old Oak North including specifically B1c along the Haul Road.
E3: Park Royal	1. SIL boundary is not extended. 2. Additional land in Park Royal is released, such as the High Speed 2 construction work sites north and south of the canal, to accommodate other forms of development.	n/a	1. To ensure the ability for intensifying Park Royal is optimised. 2. The release of the Channel Gate High Speed 2 construction work sites would prohibit the Local Plan from meeting the London Plan jobs targets for Park Royal Opportunity Area and intensification aspirations.
E4: Open workspace	1. Delivery of onsite open workspace is required for residential and/or commercial proposals. 2 2. Delivery of small-scale workspaces is supported with coordinated delivery of rented small-scale residential units outside of the SIL.	2. To avoid conversion to residential units of live-work units provided in a single unit.	1. Policies E2 and E3 were drafted to support a range of employment floorspaces, and not solely focus on open workspaces, to support a diverse employment offer.
TC2: Town centre hierarchy	1. Identify Old Oak High Street as a Metropolitan Centre. 2. Two centres are designated in Old Oak - a District Centre to the north of the canal and a	n/a	1. To reflect the quantity of retail and leisure floorspace required to support the needs of development as defined in the Retail and Leisure Needs Study.

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
	Neighbourhood Centre around Old Oak Common Station. 3. Two centres are designated in Old Oak - a District Centre to the south of the canal around Old Oak Common Station and a Neighbourhood Centre to the north of the canal. 4. Park Royal is not identified as a Neighbourhood Centre and a different approach is taken to town centre uses in the area.		2. / 3. To reflect the geographic size of Old Oak North and Old Oak South and deliver a comprehensive and coordinated town centre over the long term. 4. To ensure local business and residential communities are well served by town centre uses.
TC3: Vibrancy	1. Take a more flexible approach to betting shops, pay-day loan shops and takeaways.	n/a	To support the health and well-being of local people and the vibrancy of town centres.
TC4: A-Class needs	1. Identify OPDC as a more significant retail destination with a higher quantum of retail over and above that required to serve the needs of the development.	n/a	To reflect the evidence base in the Retail and Leisure Needs study recommending the delivery of a Major Town Centre during the plan period and to manage impacts the vitality and viability of surrounding town centres.
TC5: Culture, sports and leisure facilities	1. Set a quantum threshold for culture, sports and leisure uses.	n/a	To support the ability for culture, sports and leisure uses to aid with placemaking and support the potential for a major cultural, sports or leisure use to locate in the area and act as a catalyst for regeneration.
TC7: Evening night time economy	1. Take a more flexible approach to hours of operation for night-time economy uses in Old Oak, particularly in vicinity of Old Oak Common station.	n/a	To manage the cumulative impacts of night-time economy uses on residential uses.
SI1: Strategic policy for social infrastructure	1. Require new social infrastructure to be provided solely on-site rather than looking to expand surrounding existing facilities.	n/a	To ensure the needs of residents in early phases of development are met and help to knit together new and existing communities.

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
SI2: Education	1. Do not promote the OPDC area as a location for higher education uses	n/a	To reflect the development potential of the OPDC area and the potential for education facilities to act as catalyst uses for the area.
SI5: Pubs	1. OPDC takes a more flexible approach to the loss of public houses and does not set out stringent requirements for information on accounts and marketing of the property.	n/a	To prevent the loss of public houses and their role in local communities.
T1: Strategic policy for transport	1. Giving priority to car travel	n/a	To support the delivery of the Healthy Streets, prevent congestion on the local street network, prevent contribution to air pollution and support the health and well-being of local communities.
T7: Car parking	1. Setting less stringent car parking standards. 2. Car free – no residential car parking. Only blue badge. 3. Take a more flexible approach to parking standards for new commercial developments in Old Oak.	n/a	1. To avoid contributing to congestion on the local street network. 2. To reflect the potential need for private vehicle transport before public transport services are improved and increased. 3. To reflect the excellent levels of future public transport accessibility and prevent congestion on the local street network.
T8: Freight, servicing and deliveries	1. No controls over deliveries and servicing. 2. Ban deliveries and servicing by larger vehicles.	n/a	1. To manage the impact of increased freight and servicing vehicles on the local street network. 2. To avoid unduly negatively impacting commercial uses.
T9: Construction	1. There is no control or co-ordination of construction transport 2. All freight has to be moved by rail or water	n/a	1. To protect local amenity and manage impacts on the local street network. 2. To recognise that it is not practical to move all freight by rail or water.
T10: Transport Assessments and Travel Plans	1. Requiring a transport assessment for all developments.	n/a	1. To align with TfL guidance and recognise that very small-scale developments are unlikely to have a minimal impact on the road network.

Preferred Policy	Reasonable alternatives	Reasons for selecting these alternatives	Reasons for choosing the preferred policy in place of the reasonable alternative
	2. Increasing the threshold for schemes that require a transport assessment.		2. To prevent development being delivered without the adequate assessment of its impacts on the transport network.
EU2: Smart technology	1. That the provision of interoperable, open and usable data is not specifically required.	n/a	To support the delivery of an appropriately open data environment to benefit local people and consultation activities.
EU4: Waste management	1. Safeguard all waste sites in Old Oak.	n/a	To enable development capacity to be optimised in Old Oak North where waste management capacity of lost waste sites can be managed elsewhere.
EU5: Circular economy and resource efficiency	1. Safeguard all waste sites in Old Oak.	n/a	To enable development capacity to be optimised in Old Oak North where waste management capacity of lost waste sites can be managed elsewhere.
EU6: Decentralised energy	1. To delete the policy reference to 'major' development, so that the policy requirements apply to 'all' development.	n/a	To recognise that delivering energy systems may negatively impact the viability of non-major development proposals.
EU7: Digital communications	1. OPDC does not specifically seek to integrate contemporary technology and accommodate future technologies to address challenges and create opportunities.	n/a	To ensure Old Oak and Park Royal is sufficiently robust to address challenges and create opportunities to support local residential and business communities.

3 Justifying the proposed approach

It is a requirement of the SEA Directive, as well as the SEA Regulations, for the SEA to give the reasons for the selection of the proposed approach in the Plan in light of the reasonable alternatives dealt with.

The SEA Directive Art 9.1 states:
"Member States shall ensure that, when a plan or programme is adopted, the authorities referred to in Article 6(3), the public and any Member State consulted under Article 7 are informed and the following items are made available to those so informed: (a) the plan or programme as adopted; (b) a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and (c) the measures decided concerning monitoring in accordance with Article 10."

Regulation 16 of the SEA Regs 2004 states, with regards to post adoption statements:
"Information as to adoption of plan or programme: 4) … (a)how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; … (e)the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f)the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme."

Section 3.4 of the OPDC Regulation 19(2) Second Revised Draft Local Plan IIA Report (May 2018) states that the purpose of the IIA assessments *"was to determine the sustainability strengths and weaknesses of each option, such that this information would be used by the plan-makers to develop the plan's policy options and preferred policies (section 6.3). The preferred policies and policy options were then assessed alongside one another in detail, which enabled a comparison of their predicted sustainability effects, to inform the development of the preferred policies. A matrix was used for this assessment enabling the policies and options to be easily compared."*

The IIA therefore made clear that OPDC's decision-making in terms of taking options was, in part, determined by their sustainability performance in light of the alternatives dealt with. However, as set out in both the SEA Directive and the SEA Regulations, the requirement to give reasons for selecting the proposed approach in light of the alternatives dealt with is typically satisfied within the post-adoption statement of the Plan. As such, it is expected that the post-adoption statement of the OPDC Plan will seek to further clarify the reasoning behind the selection of the proposed approach. Nonetheless, Table 3.1 presents how the policies recommendations from the IIA have been taken into consideration on the Local Plan.

Table 3.1: *How the recommendations of the iterative IIA process have influenced the development of the Local Plan*

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
Strategic Policies			
Places	IIA objective 1, P3 - It is suggested that further clarity with regards to green infrastructure is provided strategically, to which the requirement within the policy could refer to. It is also recommended that it is referred to as 'multifunctional green infrastructure' as, although SuDS are referred to in the supporting text, green infrastructure has the potential to provide greater benefits.	Yes	Policy SP8 has been drafted. Glossary definition refers to multifunctional role of green infrastructure.
	IIA objective 1, P4 - It is recommended that clarity is provided in the supporting text as to the nature of 'new and enhanced green and civic spaces' as required through the policy wording in relation to green infrastructure, and what their functions are intended to be.	Yes	Policy P3 now provides further details on the canal Local Park and smaller spaces. Policy P1 has been streamlined.
	IIA objective 4, P1 - It is suggested that the 'delivery' and 'transport' sections of the policy repeat the supporting of transport infrastructure. These two sections could be merged, to avoid repetition. It is also suggested that the 'streets' section (o) repeats the need for the new transport infrastructure to integrate with its surroundings. These two sections could be streamlined to avoid repetition.	Yes	This level of detailed is considered to be more appropriate for Supplementary Planning Documents.
	IIA objective 4, P7 - It is suggested that the proposed 'connections' across the A40 are explained more clearly in the policy text.	Yes	Policy H8 provides this additional information.
	IIA objective 4, P10 - The policy wording could specify that promoted access to Wormwood Scrubs would be via walking and cycling modes, as set out in the supporting text to the policy.	No	Policy P12 refers to walking and cycling routes.
	IIA objective 5, P5 - The policy could provide further information following the completion of the OPDC Gypsy and Traveller Accommodation Needs Assessment in light of emerging legislation.	Yes	To avoid repetition in place policies, policy EU3 provides a single reference point for surface water management.
	IIA objective 6, P4, P5, P6, P8 & P9 - Supporting text could include a strategy for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk.	Yes	Policy EU3 refers to vegetated SuDs.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	IIA objective 6, P7 - A scheme of planting, connected to a wider green infrastructure network, which may also include SuDS, could be included as a requirement in the Local Plan.	No	Policy P12 refers to SuDS to address surface water flooding issues.
	IIA objective 6, P10 - Supporting text could include a strategy for how surface water flood risk may be overcome that further relates to the Water Policy. This could help deliverability and reduce flood risk.	Yes	Supporting text has not been updated to repeat evidence base. Supporting text has been amended to refer to amenity management policies.
	IIA objective 7, P2 - The introductory text indicates that an Old Oak Common Decentralised Energy Strategy is currently in preparation. It is suggested that the findings of this study are reflected in the supporting text, to provide more detail in relation to the supported 'energy centre'. How potential pollution from this facility might be managed could be explained.	Yes	Supporting text has not been updated to repeat evidence base. Supporting text has been amended to refer to amenity management policies.
	IIA objective 7, P7 - It is suggested that following the development of further work on the A40, additional detail could be provided for the proposed 'connections' across the A40.	No	This level of detailed is considered to be more appropriate for Supplementary Planning Documents.
	IIA objective 8, P9 - Should further information be provided by HS2 regarding their waste management plans, policies are alternative guidance should reflect this.	No	HS2 waste management is not managed by the Local Plan.
	IIA objective 9, P1 - The management of water quality in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development.	No	This level of detailed is considered to be more appropriate for Supplementary Planning Documents.
	IIA objective 9, P1 - The management of water quality in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development.	No	This level of detailed is considered to be more appropriate for Supplementary Planning Documents.
	IIA objective 9, P4 - It is suggested that water quality issues are also included as a consideration when considering the future use of the canal.	Yes	Policy EU3 provides guidance to protect the canal in relation to future use.
	IIA objective 10, P1 - Improving connections could be tied to the development of an area-wide multi-functional Green Infrastructure Strategy. The Local Plan text states that this is currently being developed. It is suggested that, when this is available, relevant text is added explicitly to the policy wording to improve deliverability. The	No	Policy SP8 provides this guidance.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	management of biodiversity in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development.		
	IIA objective 10, P2 - The policy should provide further information in the supporting text relating to how development should be 'mindful' of these assets as well as how biodiversity may be enhanced within open spaces.	Yes	This level of detailed is considered to be more appropriate for Supplementary Planning Documents.
	IIA objective 10, P4 - It is recommended that measures to enhance biodiversity are encouraged through the policy wording and set out in the supporting text, including the rationale behind a specific lighting strategy. This should help enable successful implementation. It is suggested that some elements of the policy are re-ordered, so that impacts on the water environment and biodiversity are set out under 'environment' in connection with the green infrastructure network.	No	This level of detailed is considered to be more appropriate for Supplementary Planning Documents
	IIA objective 10, P6, P7 & P8 - It is recommended that measures to improve local biodiversity, such as through the extension of the green infrastructure network into the area, or through street planting/landscaping schemes, could be promoted through the policy to improve both biodiversity.	Yes	Policy P3 seeks to enhance biodiversity. Policy P6, P7 and P10 have been amended to refer to delivering green infrastructure.
	IIA objective 12, P1 - It is suggested that further detail relating to how development should reflect the historic character and appearance of the Old Oak area is reflected in the policy wording and supporting text. This should include the identification and protection of local views and the settings of historic assets. However, it is noted that the OPDC Heritage and Views Study is yet to be completed.	Yes	Policy P3 addresses this through biodiversity conservation. Policy P3 has been reordered accordingly.
	IIA objective 12, P2 - The policy should seek to reduce repetition within the policy with regards to the ecological and historical character of the Grand Union Canal as well as provide further information in the supporting text relating to how development should be managed in relating to enhancing nature conservation and heritage assets.	Yes	Policies to conserve and enhance heritage are included in policies P1 and P2.
	IIA objective 12, P3 - It is recommended that this requirement from the supporting text is included in the policy wording to improve implementation.	Yes	Repetition in Policy P3 has been removed. As the town centre crosses more than one place, this wording has been used to inform policy TCC1.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	IIA objective 14, P8 - Reference to active frontages, as included in the supporting text, should be specified in the policy wording to improve deliverability.	Yes	Policy P1 refers to conserving and enhancing heritage. Relevant assets are identified. Local views are identified in policy D7.
	IIA objective 14, P10 - The management of the park could include measures to reduce crime and the fear of crime when using or accessing the park, particularly if it would be open during the evenings.	Yes	Policy P6 refers to delivering Healthy Streets and new open spaces. Supporting text to P12 refers to addressing security and lighting.
	IIA objective 15, P6 - Health levels within the area could be improved through the extension of the green infrastructure network through this area, to create more pleasant walking and cycling routes.	Yes	Policies to conserve and enhance heritage are included in policies P1 and P2.
	IIA objective 16, P1, P2, P3 & P4 - Town centre uses could be specified to include education facilities where necessary.	No	Policy P10C1 to P10C4 provide guidance for active frontages.
	IIA objective 17, P1, P2 & P3 - The provision of training facilities could be specified as a requirement in this area in addition to the guidance set out in policy E5.	No	The NPPF does not define education facilities as town centre uses.
	IIA objective 17, P7 - It is unclear from the policy text under b) what exactly the policy is supportive of. This could be made clearer in the policy wording.	Yes	Policy P7 has been amended for clarity.
	IIA objective 18, P1 - It is recommended that this is a consideration, and measures to reduce the impact on neighbouring town centres be included within the policy or highlighted to ensure that the intention behind measures is made clear.	Yes	As the town centre crosses more than one place, this wording has been used to inform policy TCC1.
Design	IIA objective 6, D1 - Where necessary, appropriate mitigation measures should be incorporated into development.	Yes	Development Management Design policies provide guidance for mitigating impacts of the design of development.
	IIA objective 6, D3 & D5 - Where necessary and appropriate, flood risk mitigation measures and measures supporting climate change adaptation should be	Yes	Policy EU2 sets out the role of green infrastructure in relation to SuDS.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	incorporated into the design of open space in accordance with the proposed water policy in the Environment and Utilities Chapter.		
	IIA objective 7, D5 - Development should seek to incorporate sustainability measures during construction and operation.	Yes	Policy SP9 requires high levels of sustainable design, construction and operation.
	IIA objective 8, D4 & D5 - Where appropriate waste and recycling facilities should be incorporated and waste minimisation techniques should be encouraged.	Yes	Policy EU6 provides this guidance.
	IIA objective 9, D3, D4 & D5 - Sustainable water measures should be adopted where appropriate.	Yes	Policy EU3 provides this guidance.
	IIA objective 10, D2 & D3 - Where possible, green corridors should be encouraged within development.	Yes	Policies SP8 and EU2 provide this guidance.
	IIA objective 14, D2 - Development design should seek to optimise natural surveillance and ensure that new spaces and routes are safe.	Yes	Policies P2 and P4 provide this guidance.
Environment and Utilities	No recommendations.	n/a	n/a
Transport	IIA objective 9, T9 - Appropriate pollution prevention would need to be considered where water transportation is concerned.	Yes	Policy EU3 provides guidance to protect the canal in relation to future use.
	IIA objective 11, T5 - Recommendation to encourage use of low carbon buses and work with TfL.	Yes	Policy T6 supports delivery of low and zero emission buses.
	IIA objective 13, T1, T2 & T3 - A recommendation would be to ensure that the needs to vulnerable and wider diversity groups are factored in to all places as different groups can have different needs.	Yes	Policy D3 seeks delivery of accessible built environment; policy SP7 requires delivery of an accessible movement network; and policies T1 and T2 provide guidance in accordance with Mayoral guidance to ensure accessibility.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	IIA objective 14, T5 - Improved lighting and high-quality shelters should be implemented on all bus services and at all bus stops.	Yes	Bus infrastructure is referenced in policy T6. Further detail will be provided in Supplementary Planning Documents.
	IIA objective 15, T6 - We recommend that new streets should give consideration to connecting more isolated areas and seek to reduce social exclusion.	Yes	Policies SP7 and T1 provide this guidance.
	IIA objective 16, T1, T2, T3, T4 & T5 - We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools.	Yes	Through Policies SP7 and T1, this will be achieved
Housing	IIA objective 1 & 5, H3 - It is suggested that bullet point 3 of the policy is unnecessary and provides repetition that could be excluded.	No	Policy H3 provides guidance for housing mix supported by local evidence base.
	IIA objective 1, H7 - The policy could include a requirement relating to existing shared housing, similar to that included within the supporting text, within the policy wording.	Yes	This guidance provided in policy H7.
	IIA objective 1, H10 - Measures that could be included to create places within the local communities as a result of student housing could be suggested to enhance their presence within the built environment.	Yes	This is provided within the supporting text to policy H10.
	IIA objective 2, H8 - The policy wording could usefully identify the need for developments to be high density, if this is appropriate.	Yes	Policy SP9 provides this guidance.
	IIA objective 5, H1 - Details pertaining to what the housing needs will be within the area, in order to identify whether these needs are being 'met' within the housing policies, could be provided in the supporting text. This may be implemented in the next stage of the Local Plan, once the evidence-base studies are complete. It is unclear where the 10% of housing to meet building regulation M4(3) 'wheelchair user dwellings' has come from. Reference to the evidence-base for this proportion could be usefully provided in the supporting text. If this is a standard requirement within the building regulations, it is suggested that it need not be included within the policy wording.	Yes	This is provided in supporting text to policy H2. This is provided in supporting text to policy H3.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	IIA objective 5, H5 - It is further recommended that repetition with regards to housing mix is removed between housing policies H3 and H5. The policy could seek to require that conversions of existing and vacant buildings include provision for ensuring that the accessibility of buildings is brought up to the standard required for new developments.	No	Housing mix policies have been consolidated to policy H3.
	IIA objective 7, H5 - The policy could seek to require that conversions of existing and vacant buildings include provision for ensuring that the energy efficiency of buildings is brought up to the standard required for new developments.	No	This would repeat guidance provided in policy D3. This would repeat guidance provided in policy EU9.
	IIA objective 7, H8 - It is recommended that high quality design aspects also specify the need for energy efficient design, which should help to reduce the cost of living for older people and improve their health.	Yes	Policy H8 has been amended.
	IIA objective 8, H5 - The policy could add a requirement that conversions do not result in cumulative stress on the local environment, including pollution levels such as air, noise and light pollution as well as the potential impact on biodiversity, land quality and water quality.	Yes	Policy H5 has been amended. Other environmental policies also provide relevant guidance.
	IIA objective 9, H9 - The policy could include a requirement for the improvement of connections to services and facilities including utilities to the existing site, should this be necessary. Detail relating to this could be included in the supporting text.	Yes	This would repeat guidance provided in policy EU9
	IIA objective 12, H9 - Proposals for new gypsy and traveller sites could impact on the local historic environment. However, whether there is a need for new sites is currently unknown until the outcomes of the study are published. This could be included in the policy wording as a consideration.	No	Policy D8 provides guidance for conserving and enhancing the built environment.
	IIA objective 13, H5 - The policy could be reworded to seek that the conversion of existing dwellings and vacant buildings seeks to enhance the amenity of the local community, as opposed to seeking a minimal effect.	No	The approach to maintaining amenity of neighbourhoods is considered to be appropriate.
	IIA objective 13, H9 - The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts.	No	The approach to maintaining amenity of neighbourhoods is considered to be appropriate.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
	IIA objective 14, H9 - The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts. This could help to reduce a possible perception of fear of crime.	No	Policy H8 requires new sites to be accessible to public transport, services and facilities and be capable of support by local social infrastructure. This is considered to be appropriate. Policy H8 requires new sites to be accessible to public transport, services and facilities and be capable of support by local social infrastructure. This is considered to be appropriate. Policy SP4 supports social cohesion of all communities.
	IIA objective 15, H1 - The policy wording could specifically refer to the need for developments to be designed with the health and wellbeing of residents in mind. Design measures might also include measures such as high levels of thermal insulation and the provision of outside space/green roofs for all residents.	No	Policy SP2 and SP3 provide guidance for supporting health and wellbeing.
	IIA objective 15, H3 - It is recommended that the next iteration of the Local Plan considers human health as part of the mix of housing provision, through the consideration of design principles alluded to in the supporting text provided for policy H1. It is suggested that the requirements relating to housing mix within policies H1 and H3 are consolidated into the same policy.	No	This would repeat policy SP3 which provides guidance for improving health and reducing health inequalities. This applies to housing. Housing mix policies have been consolidated to policy H3.
	IIA objective 15, H5 - See recommendation under objective 13. The requirements for new development in terms of requirements for improving mental and physical health should also be applied to the conversion of existing and vacant dwellings, to seek that inequalities are not exacerbated.	No	This would repeat policy SP3 which provides guidance for improving health and reducing health inequalities. This applies to housing.
	IIA objective 15, H10 - It is recommended that the policy ensures that new student accommodation is supported by an appropriate level of services and facilities, to meet the needs of the students. This could also help to reduce impacts on residential amenity in a positive way. The creation of new facilities and services might include sports facilities, which could be shared locally.	Yes	Policy H10 provides this guidance.

Policy Topic	Policy Recommendations Made through IIA Process	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account (Policy numbering between the Regulation 18 and Submitted Local Plan versions changed)
Employment	IIA objective 6, E3 - Appropriate climate change mitigation and adaptation measures should be incorporated where possible - as per Preferred Policy Option EU3: Water.	Yes	Policy P4 provides this guidance.
Town Centres and Community Uses	No recommendations.	n/a	n/a
Delivery and Implementation	No recommendations.	n/a	n/a

4 Quality Assurance Checklist

4.1 SEA Checklist

Table 4.1 presents a quality assurance checklist from the Practical Guide to SEA[21]. This checklist provides a concise overview of where within the Reg 19 (2) IIA Report various requirements of an Environmental Report have been met. This was included in Appendix F of the Reg 19 (2) IIA Report. However, where necessary, further detail is provided in **Table 4.1** of this Addendum, to clarify how and why certain requirements have been satisfied in the way that they have been. A quality assurance checklist was originally provided in Appendix F of the Reg 19(2) IIA Report. This has been updated with additional detail in **Table 4.1**.

Table 4.1: *Completed SEA Quality Assurance Checklist*

Requirement for SEA	Comments
Objectives and context	
The plan's or programme's purpose and objectives are made clear	Chapter 1 of the IIA Reg 19(2) Report
Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets	IIA Scoping report, Chapter 3 of the Reg 19(2) report as well as Appendix B of the Reg 19(2) Report
SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate.	IIA Framework in Chapter 3, Section 9 of the Reg 19(2) Report
Links with other related plans, programmes and policies are identified and explained	IIA Scoping report, Chapter 3 of the Reg 19(2) report as well as Appendix A of the Reg 19(2) Report
Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described	Chapter 3 of the Reg 19(2) report
Scoping	
Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report	The IIA Scoping report was consulted on with the statutory consultees and the public. Responses received were factored in during the preparation of the IIA Report accompanying the Regulation 18 consultation.
The assessment focuses on significant issues	The scoring system used throughout the IIA distinguishes between major (significant) and minor (likely insignificant) effects. Minor effects are also identified to feed into the cumulative/synergistic effects assessment as multiple minor effects can cumulate into major (significant) effects.
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	Chapter 4, Section 8 of the IIA Reg 19(2) Report
Reasons are given for eliminating issues from further consideration.	IIA Scoping report determined the issues required for consideration in the IIA, as agreed with the statutory consultees.

[21] Office of the Deputy Prime Minister (2005) A Practical Guide to the Strategic Environmental Assessment Directive.

Requirement for SEA	Comments
	Summarised in the Reg 19(2) report in Chapter 4, Section 4.2 (baseline summary) and Chapter 4, Section 4.3 (key environmental issues / problems).
Alternatives	
Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	Chapter 8 – policy alternatives
Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant	Alternatives considered in the IIA of the London Plan included do-minimum scenarios
The environmental effects (both adverse and beneficial) of each alternative are identified and compared	Assessments in the Reg 19(2) identify effects ranging classified as major negative, minor negative, neutral/negligible, positive/negative, uncertain, minor positive and major positive
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained	Chapter 4, Section 4.1 – review of PPPSIs
Reasons are given for selection or elimination of alternatives.	Section 3.4 of the OPDC Regulation 19(2) TBC in Post-adoption statement
Baseline information	
Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described	Chapter 4 and Appendix B of the Reg 19(2) report.
Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan	Chapter 4 and Appendix B of the Reg 19(2) report.
Difficulties such as deficiencies in information or methods are explained	Chapter 3 on the methodology. Uncertainty is also discussed during the assessments of options in Chapter 5 (strategic options), Chapter 6 (vision and narrative) and Chapter 7 (policies) of the Reg 19(2) report.
Prediction and evaluation of likely significant environmental effects	
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate	The IIA Objectives factored in all topics of the SEA Directive. Assessments against the IIA Framework are therefore inherently assessments against the listed SEA Topics from Annex 1(f) of the Directive, the results of which are presented in Chapter 5 (strategic options), Chapter 6 (vision and narrative) and Chapter 7 (policies) of the Reg 19(2) report.
Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.	Assessment results presented in the Reg 19(2) report state whether effects are considered to be short-, medium- or long-term.
Likely secondary, cumulative and synergistic effects are identified where practicable	Secondary effects, also called indirect effects, are identified throughout the assessment process. Cumulative and synergistic

Requirement for SEA	Comments
	effects are identified and evaluated in Chapter 7 of the Reg 19(2) report.
Inter-relationships between effects are considered where practicable	Throughout assessment results in Chapter 7 of the Reg 19(2) report
The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds.	As explained in Chapter 3, the prediction and evaluation of effects is based on relevant standards and the best available data with respect to the PPPs identified during scoping. SEA experts carrying out the appraisals used methods successfully used for years throughout the UK and as recommended by bodies including the RTPI and ODPM.
Methods used to evaluate the effects are described.	Chapter 3, section 10, 'Assessment Methodology' of the Reg 19(2) report
Mitigation measure	
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	Where appropriate and feasible measures were identified, these were proposed to OPDC alongside the assessments in Chapter 5 (strategic options), Chapter 6 (vision and narrative) and Chapter 7 (policies).
Issues to be taken into account in project consents are identified	The mitigation measures presented in Chapter 5 (strategic options), Chapter 6 (vision and narrative) and Chapter 7 (policies) of the Reg 19(2) report sometimes relate to issues that could be taken into account during the project consents stage.
The Environmental Report	
Is clear and concise in its layout and presentation	Yes, public consultation responses have consistently not highlighted issues with accessibility of the report. NTS also included. The IIA purposefully follows a clear and logical layout and format avoiding overly-technical language to be as accessible as possible to laypersons.
Uses simple, clear language and avoids or explains technical terms.	Yes, public consultation responses have consistently not highlighted issues with accessibility of the report. NTS also included. The IIA purposefully follows a clear and logical layout and format avoiding overly-technical language to be as accessible as possible to laypersons.
Uses maps and other illustrations where appropriate.	Maps and illustrations were used extensively to present baseline data summarised in Appendix B of the Reg 19(2) report.
Explains the methodology used.	Chapter 3 – approach and method, including difficulties, of the Reg 19(2) report.
Explains who was consulted and what methods of consultation were used.	Chapter 9 of the Reg 19(2) report sets out the next steps, including consultation. Appendix C of the Reg 19(2) report presents responses received during the Regulation 18 and Regulation 19(1) consultation periods, as well as how these responses were taken into consideration in the preparation of the Regulation 19(2) report.

Requirement for SEA	Comments
Identifies sources of information, including expert judgement and matters of opinion.	Chapter 4, Section 4.2 – baseline summary Chapter 4, Section 4.3 – key environmental issues / problems
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA	Non-technical summary included with the Reg 19(1) and (2) reports
Consultation	
The SEA is consulted on as an integral part of the plan making process	Consulted on at the IIA Scoping stage, the Regulation 18 stage and two Regulation 19 stages.
Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.	
Decision-making and information on the decision	
The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.	Appendix C of the Reg 19(2) report.
An explanation is given of how they have been taken into account	
Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	
Monitoring measures	
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	Chapter 8 of the Reg 19(2) report.
Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.	
Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)	
Proposals are made for action in response to significant adverse effects.	

5 Conclusion

This Addendum has provided further clarity on how the IIA process accompanying the OPDC Local Plan has satisfied the various requirements of SEA and SA and has made a meaningful contribution towards informing the plan-making process.

With regards to reasonable alternatives, it is considered that the IIA has identified and evaluated the sustainability effects of reasonable alternatives insofar as this was considered to be possible. This includes reasonable alternatives to the affordable housing strategy as well as a range of other policies. This Addendum has clarified why (see Chapter 2), as a result of the London Plan it would not have been reasonable for the OPDC to assess as an alternative an option for a quantum of development less than that set out in the London Plan. The quantum and spatial distribution of development within the OPDC as set out in the London Plan was subject to SA and SEA processes as part of the IIA for the London Plan. The SEA Directive and the SEA Regulations include provisions to avoid duplication of assessment.

This Addendum has also detailed how the approach to sites assessments is compliant with the requirements of SEA and SA (see Chapter 3) and that the assessment results are robust and transparent, with further detail provided on how the OPDC have arrived at their preferred approach.

Chapter 4 provides an overview of how the IIA process is legally compliant and has made a positive impact in ensuring the OPDC Local Plan delivers regenerative and sustainable development.

6 References

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Appendix 1

Copy of Appendix G from Reg 18 IIA Report

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APPENDIX 3

LEGAL OPINION BY PAUL BROWN QC AND RICHARD MOULES

IN THE MATTER OF
OLD OAK & PARK ROYAL DEVELOPMENT CORPORATION
LOCAL PLAN EXAMINATION AND COMPLIANCE WITH THE REQUIREMENTS OF STRATEGIC ENVIRONMENTAL ASSESSMENT

OPINION

(1) Introduction

1. We are asked to advise the Old Oak and Park Royal Development Corporation ("**OPDC**") in relation to the draft OPDC local plan (**the Draft Plan**"). In particular, we are asked for our advice on the contention advanced on behalf of Old Oak Park Limited ("**OOPL**") that OPDC's sustainability appraisal fails to satisfy the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 ("**the 2004 Regs**").

2. We understand that a copy of this Opinion is to be provided to the Inspector examining the Draft Plan.

3. In summary, we consider that:

   (1) the sustainability appraisal does comply with the 2004 Regs;

   (2) the spatial strategy and quantum of housing and employment land for inclusion in the Draft Plan were decided in the Further Alternations to the London Plan (2015) ("**FALP**") and the Old Oak and Park Royal Opportunity Area Planning Framework (4 November 2015) ("**OAPF**") – both of which were the subject of their own integrated impact assessment ("**IIA**"). Accordingly, the IIAs for the various iterations of the Draft Plan were not required to duplicate the consideration of reasonable alternatives that had occurred at a higher tier of the plan-making process;

   (3) as a matter of OPDC's reasonable plan-making judgment, there were no reasonable alternatives to the spatial strategy and quantum of housing and employment that would have been consistent with the FALP and OAPF;

(4) OPDC has complied with the requirement to give reasons; and

(5) Accordingly, OOPL's objection is misplaced and should be rejected.

(2) Main material facts

OOPL's complaint

4. Before setting out the relevant factual background and history, it is helpful to begin by summarising OOPL's complaint. OOPL's legal objection to the sustainability appraisal is contained in the *Review of Integrated Impact Assessment (IIA) (February 2019)* by JAM Consult Ltd (**"the JAM Report"**) and an Opinion written by David Elvin QC dated 1 April 2019. OOPL alleges that:

   (1) OPDC has failed to consider and identify in a transparent manner reasonable alternatives to the main strategic policies in the Draft Plan;

   (2) OPDC has failed to give reasons not only for the identification of the reasonable alternatives and the ruling out of others, but also to identify what reasonable alternatives were actually considered; and

   (3) Consequently, OPDC has failed to meet the requirements of the 2004 Regs to consult on the environmental report detailing the assessment of the reasonable alternatives at the same time as the Draft Plan.

Summary of the Draft Plan process

5. OPDC consulted on the Regulation 18 Draft Plan and its supporting evidence base between 4 February and 31 March 2016. Next, OPDC carried on the first consultation on the Regulation 19 revised Draft Plan from 29 June to 11 September 2017. Following consideration of consultation comments, OPDC carried out a second consultation on the Regulation 19 revised Draft Plan between 14 June and 30 July 2018. OPDC submitted the Draft Plan for examination on 4 October 2018.

6. At each of the above stages of consultation, OPDC provided an Integrated Impact Assessment ("**IIA**") to provide information on the sustainability of the Draft Plan, its proposals and reasonable alternatives to its proposals.

The place of the Draft Plan in the plan hierarchy

7. The Draft Plan will form part of the development plan for its area, but crucially it will be a lower tier development plan document sitting beneath the FALP.

8. Section 19(2) of the Planning and Compulsory Purchase Act 2004 ("**PCPA 2004**")

provides that *"In preparing a local development document the local planning authority must have regard to... (c) the spatial development strategy if the authority are a London Borough or if any party of the authority's area adjoins Greater London"*.

9. Section 24(1)(b) of the PCPA 2004 states that the Local Plan "must be in general conformity with-...the spatial development strategy", i.e. the London Plan.

10. Consequently, OPDC's Draft Plan must be prepared having regard to, and be in general conformity with, the FALP in order to comply with the PCPA 2004 and be sound.

The FALP

11. The London Plan is the overall strategic plan for London which sets out an integrated economic, environmental, transport and social framework for the development of London over a 20-25 year period.

12. In terms of the spatial distribution of housing, the FALP identified Park Royal and Old Oak Common as an Opportunity Area and identified an indicative capacity for development. The FALP also identified a series of other planning policy requirements for the OPDC area at Table A1.1, as follows:

> Park Royal Opportunity Area – requirements for planning in the area from the FALP
>
> Area (Ha): 713
>
> Indicative employment capacity: 10,000
>
> Minimum new homes: 1,500
>
> OAPF progress: 2
>
> Park Royal is one of London's key industrial locations, with potential to meet modern logistics and waste management requirements as well as other industrial type functions. A range of opportunities exist for industrial related development and in selected locations outside of SIL for mixed use intensification where there is good public transport accessibility. These selected locations include a series of 'gateway' sites identified in the Park Royal OAPF comprising the Eastern Gateway at Willesden Junction, the Southern Gateway around North Acton station, the Western gateway around the Diageo First Central site and the Northern Gateway centred around the Northfields industrial estate. Development should take account of London's future rail and water freight requirements and their land use implications, and the scope for improvements in strategic rail accessibility. Planning for Park Royal should be integrated with Old Oak Common and take into account the relationships with White City and Kensal Canalside Opportunity Areas.
>
> Old Oak Opportunity Area – requirements for planning in the area from the FALP
>
> (Ha): 155
>
> Indicative employment capacity: 55,000
>
> Minimum new homes: 24,000
>
> OAPF progress: 2
>
> Old Oak Common has significant regeneration potential for new housing and jobs and

could make a major contribution to London's position as a world business centre. Regeneration would centre on a new strategic public transport infrastructure hub at Old Oak Common on the HS2 line between London, and Birmingham and beyond with an interchange with Crossrail 1, other national main lines and the London Overground. This should include a new branch of Crossrail 1 linking from Old Oak to the West Coast Main Line and extending via Wembley to Watford and potentially beyond. Provision of public transport infrastructure on this scale would drive substantial development which could yield 24,000 new homes and, subject to capacity and demand, up to 55,000 jobs and a variety of complementary and supporting uses in a commercial hub around the station and in the wider area. The potential for a network of new open spaces and green links connecting Old Oak Common station to North Acton, Willesden Junction, Wormwood Scrubs and the Grand Union Canal should be investigated. Public transport accessibility and availability of amenity space should support high density development which could include a cluster of tall buildings around the interchange. Wormwood Scrubs would provide a major amenity to support this scale of development and improved access to the Scrubs is essential to deliver sustainable residential communities. Planning for Old Oak Common should be integrated with the wider Park Royal Opportunity Area, including scope for business relocations. Linkages with Kensal Canalside and White City Opportunity Areas should also be considered, including the Imperial College campus expansion and associated potential for business creation and development at Old Oak/Park Royal. A vision document for Old Oak was published in June 2013 setting out a direction of travel for the future development of the area.

13. It is notable that the London Plan housing figures for the opportunity areas are minimums: see Policy 2.13B(c) and para 2.62, which state that:

> "Development proposals within opportunity areas and intensification areas should...contribute towards meeting (or where appropriate exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1" (Policy 2.13B (c))
>
> "The Housing SPG provides guidance where these ranges may be exceeded in justified, exceptional circumstances" (para 2.62) (Emphasis added)

The OAPF

14. The OAPF is Supplementary Planning Guidance to the London Plan. The OAPF provides further detail on the spatial distribution of development in the OPDC area. Having reviewed the geographic distribution of existing land uses, the OAPF set out the Land Use Strategy Principles for development in the OPDC area. Principles L1, L2 and L3 are particularly important and provide that:

> Principle L1 - Old Oak
>
> The core development area is focussed at Old Oak (see figure 17). This area should be redeveloped as a sustainable and healthy mixed-use part of west London. In conformity with the London Plan this new urban quarter should be comprehensively redeveloped to accommodate a minimum of 24,000 new homes, and 55,000 jobs. To achieve this, there will be a requirement for significant new transport, utility and social infrastructure provision to meet the requirements of the future population. OPDC will, through its Local Plan, carry out work to further consider the deliverable quantum of development. In accordance with Policy 2.17Bb of the London Plan, it is proposed that SIL is consolidated

into the Park Royal as shown in figure 17. The official de-designation process for SIL in Old Oak would be dealt with through OPDC's Local Plan. Requirements for replacement of any resultant loss of SIL should be considered at a strategic level. Old Oak will require a mix of town centre uses. These should primarily be clustered around Old Oak Common Station, around other transport hubs and along Old Oak High Street. There may be opportunities to locate town centre uses in other locations but only where there prove to be large flows of people. Hotels, specifically those supporting business tourism, will be promoted to contribute to London's competitiveness. Central to Old Oak's success will be clear connections into its surroundings so that Old Oak is knitted into the local area. The GLA will work with OPDC and the boroughs to develop appropriate mechanisms to achieve this aspiration. There is also a need to create a network of new streets and new amenity spaces within and across Old Oak, along the Grand Union Canal and to Wormwood Scrubs to ensure these places become integral parts of this network. Within Old Oak there is an opportunity to attract a variety of catalyst uses, from the small to the large scale, which should help play a role in attracting people to the area and creating a destination. Additionally, there are opportunities created by Old Oak's proximity to existing and emerging employment growth sectors generated at the Imperial College White City campus. Old Oak and Park Royal could accommodate the delivery of scaleup workspace in helping to develop both locations as leading smart technology clusters.

Principle L2 - Park Royal

Park Royal performs a vital role in supporting the London economy. Building on the area's existing success there is a fantastic opportunity for Park Royal to become the UK's leading industrial location. Park Royal could establish itself as a globally recognised centre for developing innovations such as smart and clean-tech industries. There are also opportunities to attract growing businesses from Imperial College Campus into Park Royal. This can be achieved by; continuing to protect Park Royal as a Strategic Industrial Location (SIL); identifying interventions to improve transport and utility (including connectivity) infrastructure; managing impacts generated during and after the redevelopment of Old Oak; and developing planning and design policies that encourage development that makes more efficient use of land and that works to attract different sectors to the area through the OPDC Local Plan. Today Park Royal houses approximately 1,200 workspaces, employing over 30,000 people in over 2.3 million square metres of gross floor area. The area's historical development has seen changes in the types and form of businesses. During the life of this plan there is a need to improve the operation of the estate and where possible to intensify uses to cater for up to 10,000 new jobs. Given the timescales involved what is most important now is the development of a place that functions well, and which is an attractive business location. Whilst there may be opportunities to support and promote the location of specific business sectors, it is important to retain flexibility to ensure Park Royal can evolve to changing market demands in a timely manner. Park Royal could also play a valuable role in accommodating displaced employment floorspace and businesses from Old Oak. Outside of SIL, development should be more mixed use, and should look to deliver a minimum of 1,500 homes. In the centre of Park Royal, the existing retail centre should be enhanced and expanded so that it can become a local hub for residents and businesses in Park Royal to include business support services and uses such as meeting spaces and business hotels. The existing character of the Wesley Estate and the nearby playing fields should be enhanced with the Heart of Park Royal reinvigorated to provide a range of services for local communities.

Principle L3 - Wormwood Scrubs

Continue the protection of Wormwood Scrubs as a valuable amenity and ecological space for Londoners and its wildlife, coupled with improved access and sensitive enhancements where appropriate. Wormwood Scrubs is located between Old Oak and White City. Improved access to the Scrubs would provide people with the opportunity to enjoy this space and would also help to improve connectivity between both places. OPDC will undertake a study of Wormwood Scrubs and any proposals would be agreed with the

Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and discussed with the local community Park Royal could also play a valuable role in accommodating displaced employment floorspace and businesses from Old Oak.

15. In addition to the Land Use Strategy principles, the OAPF also contains: the Design Strategy; the Old Oak Strategy; the Park Royal Strategy; the Wormwood Scrubs Strategy; the Transport Strategy; the Environment Strategy; and the Delivery Strategy.

16. The FALP (and earlier iterations of the London Plan) was subject to its own IIA process and reports satisfying the requirements of the 2004 Regs. The IIA for the FALP considered (as part of its scoping) four different spatial development options. The chosen option (option 4) was to "Enhance the existing spatial development model (set out in the London Plan 2011) by bringing forward more sites and increasing density based on transport accessibility to accommodate growth within London's boundaries without strategic extensions onto Green Belt and/open land".

17. The preferred option resulted in a number of proposed policy alterations that were then grouped into categories, one of which was: "Increase the focus on housing provision (and density) in town centres and opportunity areas". This preferred option was then assessed against two alternatives, namely: A – "Do not increase focus for housing provision (and densities) in town centres and opportunity areas"; and B – "Only include reference to either town centres or opportunity areas" (see table 4.5 of Amec IIA dated December 2013).

The Draft Plan

18. Against that background, it can be seen that the FALP and the OAPF provide detailed requirements on the quantity of development that the Draft Plan should deliver, as well as the spatial distribution of that development and the other planning policy requirements it should conform to.

19. In formulating the Draft Plan, OPDC assessed the minimum residential density required to deliver 25,500 homes across the available areas for residential development (i.e. the minimum number of homes indicated the FALP for the Opportunity Area). OPDC determined that this would require a density of 447 units per hectare to be delivered across all areas identified as suitable for housing, but that this approach would not be consistent with London Plan Policy 2.13 which requires that development should respond to opportunities presented by public transport access improvements and constraints generated by sensitive locations within a local context. OPDC therefore ensured that the quantum of development could be delivered consistently with the London Plan by revising the proposed housing figure in the Draft Plan to 20,100 homes

over the Plan period (and 26,500 homes across the full development period).

20. OPDC's Development Capacity Study also considered the office floorspace required in light of the FALP indicative employment capacity figure and determined that 40,400 jobs could be accommodated in the area within the Plan period and a total of 60,700 across the full development period.

(3) Analysis of the question asked

21. For the reasons given below, we consider that OPDC's IIA does comply with the 2004 Regs and that OOPL's objection is misplaced.

22. First, the spatial strategy and quantum of housing and employment land for inclusion in the Draft Plan were decided in the FALP and the OAPF – both of which were the subject of their own sustainability appraisal. The IIA for the Draft Plan was not required to duplicate the consideration of reasonable alternatives that had occurred at a higher tier of the plan-making process.

23. Directive 2001/42/EC on the assessment of the effects of certain plan and programmes on the environment ("**the SEA Directive**") expressly contemplates strategic environmental assessment being carried out at a higher level of plan making thereby obviating the need to undertake duplicate work when making a lower tier plan.

24. Article 4(3) of the SEA Directive provides:

> Where plans and programmes form part of a hierarchy, Member States shall, with a view to avoiding duplication of the assessment, take into account the fact that the assessment will be carried out, in accordance with this Directive, at different levels of the hierarchy. For the purpose of, inter alia, avoiding duplication of assessment, Member States shall apply Article 5(2) and (3).

25. Article 5(2),(3) of the SEA Directive provides:

> (2) The environmental report prepared pursuant to paragraph 1 shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.
>
> (3) Relevant information available on environmental effects of the plans and programmes and obtained at other levels of decision-making or through other Community legislation may be used for providing the information referred to in Annex I.

26. That approach is reflected in Regulation 12 of the 2004 Regs:

12.— Preparation of environmental report

(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of–

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

(3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of–

(a) current knowledge and methods of assessment;

(b) the contents and level of detail in the plan or programme;

(c) the stage of the plan or programme in the decision-making process; and

(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

(4) Information referred to in Schedule 2 may be provided by reference to relevant information obtained at other levels of decision-making or through other [EU] [1]legislation.

(5) When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.

(6) Where a consultation body wishes to respond to a consultation under paragraph (5), it shall do so within the period of 5 weeks beginning with the date on which it receives the responsible authority's invitation to engage in the consultation. (Emphasis added)

27. The consequences of Regulation 12(3)(d) can clearly be seen from Beatson J's decision in ***Shadwell Estates Ltd v Breckland DC*** [2013] EWHC 12. In that case, the claimant's challenge to an area action plan failed *inter alia* because the accompanying sustainability appraisal was not required to duplicate work done in relation to the higher tier core strategy with which the area action plan had to conform:

> 80. My summary of the sustainability appraisal shows that there are numerous references in it to biodiversity issues, impacts on stone-curlews, and alternatives, including developing the area to the south east of Thetford. Shadwell's criticisms of the appraisal (see [59], [60], and [69]) are of a highly detailed nature. Does the appraisal's treatment of the position of Kilverstone and the area to the north east of Thetford mean that it cannot be described as, in substance, a sustainability appraisal for the purposes of the Regulations? The answer depends on whether it was required to provide a comprehensive assessment of the entire body of evidence about stone-curlew activity, notwithstanding the quality of the evidence. I have concluded that it was not.
>
> 81. First, the sustainability appraisal was required to assess the likely significant effects on the environment of implementing the TAAP and reasonable alternatives. The Regulations make it clear that the information required is that which may "reasonably be required" taking account inter alia of the need "to avoid duplication of the assessment": EAPPR 2004, regulation 12(3)(d). The sustainability appraisal, strategic environmental assessment and

> Habitats Regulations assessment for the Core Strategy had not been challenged and were supported by Natural England and the RSPB. Those assessments led to the decision to adopt the orange and blue buffer zones in the designated areas. Shadwell's current position appears to be that the buffer zones should be altered either by including Kilverstone in the orange zone or by including it or part of it in the blue zone. But since the TAAP is required to conform to the Core Strategy, it is difficult to see how it would be possible to alter the buffer zones.

28. As set out above, in the present case, the spatial strategy and quantum of housing and employment land for inclusion in the Draft Plan have been determined by the FALP and OAPF and alternatives were tested appropriately at that higher tier stage. Consequently, the 2004 Regs do not require further assessment of alternatives as part of the Draft Plan process. On the contrary, such duplication is not assessment that is "reasonably required" within the meaning of Regulation 12(3)(d).

29. Secondly, OPDC has reasonably concluded that there are in fact no reasonable alternatives to the spatial strategy and quantum of housing and employment land for inclusion in the Draft Plan given the requirement that the Draft Plan be consistent with the FALP and OAPF.

30. Although a plan making authority is required to assess "reasonable alternatives" the SEA Directive and the 2004 Regs do not define what "reasonable alternatives" are. Instead, it is a matter of evaluative planning judgment for the authority to determine: (a) whether there are any reasonable alternatives; and (b) if so, what they are. The courts will not interfere with the authority's judgment save on conventional public law grounds such as *Wednesbury* reasonableness.

31. In ***R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers*** [2015 Env LR 1, Hickinbottom J summarised the law relating to reasonable alternatives as follows:

> 88. I shall deal with specific aspects of those cases in due course; but I will first set out propositions concerning "reasonable alternatives" for the purposes of art.5(1) of the SEA Directive which I derive from them, of course read with the Directive itself. In these propositions, I simply refer to a "plan", rather than "plan or programme"; but both are intended to be covered. I refer to the relevant decision-maker as "the authority".
>
> i) The authority's focus will be on the substantive plan, which will seek to attain particular policy objectives. The EIA Directive ensures that any particular project is subjected to an appropriate environmental assessment. The SEA Directive ensures that potentially environmentally-preferable options that will or may attain those policy objectives are not discarded as a result of earlier strategic decisions in respect of plans of which the development forms part. It does so by imposing process obligations upon the authority prior to the adoption of a particular plan.
>
> ii) The focus of the SEA process is therefore upon a particular plan—i.e. the authority's preferred plan—although that may have various options within it. A plan will be

"preferred" because, in the judgment of the authority, it best meets the objectives it seeks to attain. In the sorts of plan falling within the scope of the SEA Directive, the objectives will be policy-based and almost certainly multi-stranded, reflecting different policies that are sought to be pursued. Those policies may well not all pull in the same direction. The choice of objectives, and the weight to be given to each, are essentially a matter for the authority subject to (a) a particular factor being afforded particular enhanced weight by statute or policy, and (b) challenge on conventional public law grounds.

iii) In addition to the preferred plan, "reasonable alternatives" have to be identified, described and evaluated in the SEA Report; because, without this, there cannot be a proper environmental evaluation of the preferred plan.

iv) "Reasonable alternatives" does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.

v) Article 5(1) refers to "reasonable alternatives *taking into account the objectives... of the plan or programme...* " (emphasis added). "Reasonableness" in this context is informed by the objectives sought to be achieved. An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". An option which will, or sensibly may, achieve the objectives is a "reasonable alternative". The SEA Directive admits to the possibility of there being no such alternatives in a particular case: if only one option is assessed as meeting the objectives, there will be no "reasonable alternatives" to it.

vi) The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.

vii) However, as a result of the consultation which forms part of that process, new information may be forthcoming that might transform an option that was previously judged as meeting the objectives into one that is judged not to do so, and vice versa. In respect of a complex plan, after SEA consultation, it is likely that the authority will need to reassess, not only whether the preferred option is still preferred as best meeting the objectives, but whether any options that were reasonable alternatives have ceased to be such and (more importantly in practice) whether any option previously regarded as not meeting the objectives might be regarded as doing so now. That may be especially important where the process is iterative, i.e. a process whereby options are reduced in number following repeated appraisals of increased rigour. As time passes, a review of the objectives might also be necessary, which also might result in a reassessment of the "reasonable alternatives". But, once an option is discarded as not being a reasonable alternative, the authority does not have to consider it further, unless there is a material change in circumstances such as those I have described.

viii) Although the SEA Directive is focused on the preferred plan, it makes no distinction between the assessment requirements for that plan (including all options within it) and any reasonable alternatives to that plan. The potential significant effects of that plan, and any reasonable alternatives, have to be identified, described and evaluated in a comparable way.

ix) Particularly where the relevant plan sets a framework for future projects (e.g. a core planning strategy), it may be appropriate and indeed helpful to have an SEA process that is iterative. If so, the appraisal has to evaluate the extant options at each stage in a comparable way. As part of an iterative SEA process, options which may be capable of achieving the objectives may be discarded on the way; but such options cannot be discarded without being subjected to an SEA Directive -compliant assessment.

x) Although an SEA process that is iterative may be particular appropriate for some framework-setting plans and programmes, it is by no means mandatory. The authority may adopt a non-SEA process to identify those options which meet the objectives. That non-SEA process may itself be iterative.

xi) The objectives an authority sets for plans caught by the SEA Directive are likely to be particularly broad and high level, as well as multiple and varied. An assessment as to whether the objectives would be "met" by a particular option is therefore peculiarly evaluative; but an option will meet the objectives if, although it may not be (in the authority's judgment) the option that best meets the objectives overall (i.e. the preferred option), it is an option which is capable of sufficiently meeting the objectives such that that option could viably be adopted and implemented. That, again, is an evaluative judgment by the authority, which will only be challengeable on conventional public law grounds. However, whilst allowing the authority a due margin of discretion, the court will scrutinise the authority's choice of alternatives considered in the SEA process to ensure that it is not seeking to avoid its obligation to evaluate reasonable alternatives by improperly restricting the range options it has identified as such.

xii) The authority has an obligation to give outline reasons for selecting (i) its preferred option over the reasonable alternatives, and (ii) the alternatives "dealt with" in the SEA process. Alternatives "dealt with" include both (i) reasonable alternatives (which must be dealt with in the SEA process) and (ii) other alternatives (which need not, but may, be dealt with in that process). The reasons that are required are merely "outline". The authority need only give the main reasons, so that consultees and other interested parties are aware of why reasonable alternatives were chosen as such (including, in appropriate cases, why other options were *not* chosen as reasonable alternatives)—and, similarly, why the preferred option was chosen as such. (Emphasis added)

32. In the present case, OPDC has lawfully concluded that there are no reasonable alternatives to the spatial strategy and quantum of housing and employment land for inclusion in the Draft Plan given the requirement that the Draft Plan be consistent with the FALP and OAPF. The FALP and OAPF both envisage significant levels of housing and employment development in the opportunity area. Indeed, the London Plan makes clear that the housing numbers for the opportunity areas are *minimum* figures and it is not therefore a reasonable alternative to plan to deliver less than the London Plan minimum figure.

33. An alternative that did not involve redevelopment of OOPL's Cargiant site as envisaged by draft Policy P2 would not meet the objectives of the Draft Plan or the strategic objectives set by the higher level FALP and OAPF. Consequently, that alternative would not be a *reasonable* alternative and OPDC was under no obligation to assess it as part of the Draft Plan process.

34. Whether or not a plan meets the requirement of "general conformity" is a matter for the judgment of the Inspector examining it. That being said during the passage of the PCPA 2004 the Minister explained "*it is the Government's policy that it is only where a LDD would cause significant harm to the implementation of the regional spatial strategy that the local development document should be considered not to be in general conformity*" (Lord Rooker, Hansard, 27 January 2004, Col. 155). The Cargiant site is the

Local Plan's largest site allocation by some margin given that it is allocated to provide 5,300 net additional housing units (see Local Plan Table 3.1; Site Allocations). If OPDC were not to allocate the Cargiant site for redevelopment these 5,300 new homes (plus the new job creation target) would not be achieved and this would cause significant harm to the new London Plan's target of 66,000 new homes (or 49,000 new homes per year as per the current London Plan) to be provided each year.

35. The current Mayor of London has placed great importance on the provision of new homes in order to tackle London's housing crisis and accordingly the new London Plan has been drafted on a more prescriptive basis in order to ensure it delivers upon its objectives:

> "*Unlike previous versions of the London Plan, which have often read as sweeping statements of ambition rather than concrete plans for action, this document places a specific focus on tangible policies and planning issues and provides greater clarity over how the plan will be implemented and where in London major development and infrastructure should be delivered.*"[1]

36. It is therefore clearly open to the Inspector to conclude that not allocating the Cargiant site for redevelopment would not achieve general conformity with the London Plan. As such OPDC was under no obligation to assess not allocating the Cargiant site as it was not a reasonable alternative.

37. We should add that OPDC's approach did in fact look at more than merely compliance with the London Plan. Section 2 of the Capacity Study assessed more than one option for how to deliver the objectives set by the London Plan. As such, OPDC appropriately tested the alternative ways of delivering the London Plan housing targets across its area. OPDC was not, however, required to assess alternative housing targets to those fixed by a higher tier plan.

38. Thirdly, there has been no breach of the requirement to give reasons as alleged by OOPL (e.g. at paragraphs 18, 38, 39 and 51(2) of David Elvin QC's Opinion). To the extent that reasonable alternatives exist, OPDC has assessed them and given adequate reasons. For example, OPDC has considered four alternative approaches to affordable housing and fully appraised them and given reasons in Appendix E of the Regulation 19 IIA. Similarly, OPDC identified reasonable alternatives to 29 of the policies in the Draft Plan and assessed those in Appendix G of the Regulation IIA.

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[1] Extract from the foreword to the Draft New London Plan

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39. OOPL is dismissive of those assessments of alternatives, but in reality its reasons complaint is tied to its allegation that OPDC has failed to consider a reasonable alternative to the spatial strategy and quantum of housing and employment land for inclusion in the Draft Plan. OPPL does not make a free-standing criticism of the assessment and reasons in relation to affordable housing and the 29 identified policies. For the reasons given above, OPDC lawfully concluded in the exercise of its planning judgment that there was no reasonable alternative to the spatial strategy and quantum of housing and employment land for inclusion in the Draft Plan. As such, there was no reasonable alternative to give reasons for rejecting. The premise of OOPL's reasons complaint is flawed.

(4) IIA Addendum

40. Finally, even if there had been a failure to explain the lack of reasonable alternatives (which, for the reasons given above, we do not consider to be the case) such explanation/reasoning has been provided in the IIA Addendum (April 2019) and which is submitted to the Inspector along with this Opinion. The use of addenda in this manner is perfectly lawful and in compliance with the 2004 Regs: see ***Cogent Land LLP v Rochford DC* [2012] EWHC 2542 (Admin); *No Adastral New Town Ltd v Suffolk Coastal DC* [2015] Env LR 28.**

(5) Conclusions

41. For the reasons given above our view is that:

(1) the sustainability appraisal does comply with the 2004 Regs;

(2) the spatial strategy and quantum of housing and employment land for inclusion in the Draft Plan were decided in the Further Alternations to the London Plan (2015) ("**FALP**") and the Old Oak and Park Royal Opportunity Area Planning Framework (4 November 2015) ("**OAPF**") – both of which were the subject of their own sustainability appraisal. Accordingly, the sustainability appraisal for the Draft Plan was not required to duplicate the consideration of reasonable alternatives that had occurred at a higher tier of the plan-making process;

(3) as a matter of OPDC's reasonable plan-making judgment, there were no reasonable alternatives to the spatial strategy and quantum of housing and employment that would have been consistent with the FALP and OAPF;

(4) OPDC has complied with the requirement to give reasons;

(5) even if there was a failure to give reasons for the lack of reasonable alternatives,

such reasons have been set out in the IIA Addendum (April 2019); and

(6) accordingly, OOPL's objection is misplaced and should be rejected.



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26 April 2019