



Cabinet
27 June 2016

**Report from the Strategic Director,
Regeneration and Environment**

Wards affected:
Harlesden, Kensal Green, Stonebridge,
Tokington

Old Oak and Park Royal Local Plan Consultation Response

1.0 Summary

- 1.1 The Mayor of London has established the Old Oak and Park Royal Mayoral Development Corporation (MDC) to drive forward the regeneration of the Old Oak and Park Royal Opportunity Area, focussed around the proposed High Speed 2 and Crossrail interchange. The London Plan (2015) identifies Old Oak as an opportunity area with capacity for a minimum of 24,000 new homes and 55,000 new jobs, whilst Park Royal opportunity area has capacity for 1,500 new homes and 5,000 new jobs. The Old Oak and Park Royal Development Corporation (OPDC) consulted on their draft Local Plan which provides detailed planning policy for the area and sets out how the targets in the London Plan will be realised. An interim response was submitted by Brent Council, subject to Cabinet approval and any further comments. Although the Council supports the principle of regenerating the area, there are a number of significant outstanding concerns regarding the detailed policies in the Plan.

2.0 Recommendations

- 2.1 That Cabinet, subject to any additional amendments it considers appropriate, confirms the response to the Old Oak and Park Royal Local Plan Regulation 18 consultation as set out in Appendix A.

3.0 Detail

- 3.1 The Mayor of London has established the Old Oak and Park Royal Mayoral Development Corporation (MDC) to drive forward the regeneration of the Old Oak and Park Royal Opportunity Area, focussed around the proposed High Speed 2 and Crossrail interchange to be delivered at Old Oak by 2026. The London Plan (2015) identifies Old Oak as an opportunity area with capacity for a minimum of 24,000 new homes and 55,000 new jobs, whilst Park Royal opportunity area has capacity for 1,500 new homes and 5,000 new jobs.

- 3.2 The Old Oak and Park Royal Development Corporation (OPDC) consulted on their draft Local Plan until the 31st March 2016. The Plan provides detailed planning policy for the area and sets out how the targets in the London Plan will be realised. This is a first stage of consultation. Further consultation on a revised Plan will be undertaken in early 2017, with anticipated adoption late 2017. Although the Council supports the principle of regenerating the area, there are a number of significant outstanding concerns regarding the detailed policies in the Plan. An interim response was submitted to the consultation, subject to Cabinet approval. The full response is attached as Appendix A. key comments are as follows:-
- 3.3 **General** - The introduction of the Local Plan highlights the opportunity development at Old Oak presents for the local area, in terms of overcoming severance and creating employment opportunities. It is considered that in this section should also acknowledge the need for the existing community to have access to services and affordable housing within Old Oak, and for the business community to benefit from supply chain opportunities. It also needs to be acknowledged that without sufficient mitigation the development could have a detrimental impact on the local area, by placing further pressure on the transport network and social infrastructure. The Local Plan needs to be more explicit in setting out how policies will ensure the surrounding communities will integrate with, and benefit from the development at Old Oak and Park Royal, and how potential detrimental impacts will be mitigated. The OPDC mission statement should include explicit reference to supporting the existing community and businesses, not just to participate, but to actively benefit from the regeneration of Old Oak and Park Royal. The Council welcomes the production of a Socio-Economic Regeneration Strategy and Fringe Masterplan, and trusts these will inform the next version of the Local Plan.
- 3.4 **Places: Old Oak (Willesden Junction)** – Whilst the Plan does set out an approach the response sets out that further joint working is needed to set clear guidance for development in and around Willesden Junction station. The redevelopment of Willesden Junction station presents an opportunity to open up connections to the north, and ensure the existing communities and Harlesden Town Centre benefit from the regeneration of Old Oak. At present the development capacity of Willesden Junction is constrained due to the surrounding railway lines. Initial studies indicate due to the spacing of the railway lines there is scope to allow development above the lines. This has significant advantages in terms of supporting the achievement of housing and employment targets, placemaking and creating a stronger link between Old Oak High Street and Willesden Junction. The Council considers development above the railway lines is essential to optimise the potential of this area. The Council would also welcome a greater concentration of commercial premises at Willesden Junction, as part of such development.
- 3.5 In the short to medium term it is important that pedestrian and cycle walkways from Willesden Junction into Old Oak North are of the highest quality and can remain in use when new streets are built. They must therefore be of a comfortable width to accommodate both pedestrians and cyclists.
- 3.6 It is noted the Local Plan currently omits an important connection throughout from Willesden Junction to Harrow Road and Harlesden. This is not consistent with the objective of reducing severance between Old Oak and the surrounding area.

- 3.7 **Places: Park Royal** - Identifying Park Royal as one place ignores the significant variations in character across the area from large scale industrial units, smaller workshops serving SMEs, office-led development at First Central, the Central Middlesex Hospital and adjoining supported housing, and residential pockets. A more fine grained approach is therefore needed to define the distinct places within Park Royal and set appropriate policy.
- 3.8 **Grand Union Canal** - It is essential development provides a continuous walking and cycling route along the canal both to maximise the recreational opportunities the canal presents, and to improve connectivity between Old Oak, Park Royal and Alperton Growth Area.
- 3.9 **Design** - The design approach should be led by the objective of creating a sustainable community rather than density. A combination of mansion blocks and taller landmark buildings around transport interchanges would enable density to be achieved whilst on the whole ensuring development at Old Oak is of a 'human scale' with a community feel.
- 3.10 **Affordable Housing** - The approach to affordable housing can't be considered in isolation, but needs to be informed by an understanding of CIL viability. Further viability testing is therefore needed to inform the preferred option for securing affordable housing. However, Brent Council would be opposed to any option which does not indicate a target percentage for affordable housing, whether fixed or viability tested. A target is essential to provide a steer to developers, and assists in controlling speculation on land values. Given the timescales Old Oak will be delivered over, there needs to be flexibility to regularly review the approach to affordable housing to ensure levels are maximised.
- 3.11 As the Council has stated from the outset, Brent Council's support for the regeneration of Old Oak is subject to nomination rights for affordable housing for Brent residents. An implication of the regeneration at Old Oak is that it will drive up values in neighbouring areas, it is therefore crucial to mitigate this impact residents are able to access the affordable housing the development will provide.
- 3.12 **Harlesden Town Centre** - Brent Council strongly object to the proposal for a major town centre at Old Oak. Whilst a town centre is acceptable in principle this is subject to the scale not being shown to have a detrimental impact on Brent's centres. Major town centres, as defined in the London Plan and this Local Plan, have a high proportion of comparison retail and attract a much wider catchment. Such a centre would draw trade from neighbouring centres such as Harlesden, to their detriment. In addition, at present there is nothing in the plan to prevent a significant quantum of retail floorspace being brought forward in early phases to the detriment of both nearby centres and Old Oak High Street. If demand for town centre uses is taken up in early phases, Old Oak High Street will not be realised. This will result in a disjointed connection, and be to the detriment of placemaking.
- 3.13 Recognition is needed that the Retail Study has identified the development of a centre at Old Oak, will impact on Harlesden's growth and the OPDC, working with Brent Council and the Harlesden Forum, must be active in mitigating negative impacts.
- 3.14 **Social Infrastructure**- Policy SI1 suggests social infrastructure will not be secured on-site in earlier phases. To promote Lifetime Neighbourhoods and community

cohesion it is crucial social infrastructure is integrated throughout the development. Brent Council has been clear that there is not sufficient capacity to extend existing primary schools in the area to meet additional demand from Old Oak. If it is proposed that social infrastructure will be delivered off site this must be backed up by evidence that there is sufficient capacity to extend existing facilities, and that this approach is supported by providers. Failure to develop a clear strategy to meet infrastructure needs will result in further pressure on existing services in the surrounding area, and ultimately impact on the quality of life of existing and new residents in the area.

- 3.15 **Open Space** - Old Oak is within an area of open space deficiency, making it essential the Local Plan specifies the quantum of open space needed to meet the needs of the new community. The Plan currently doesn't recognise there will be a need to provide a range of open spaces in terms of size and function. It is expected the next iteration of the Plan will be informed by the finalised Green Infrastructure strategy, and address this concern.
- 3.16 **Extraction of Minerals** - Policy EU9 on Extraction of Minerals allows for shale gas fracturing ('fracking') within the OPDC area, subject to the 'consideration' of certain criteria. The process of extracting gas from the ground would result in significant detrimental impacts on local health and amenity, further worsening air quality in an existing Air Quality Management Area, and increasing noise pollution. As such, the promotion of shale gas extraction is not consistent with the promotion of Old Oak as a healthy new town, or the Local Plan objective to improve the quality of life, enhance health and well-being of communities. The Council is therefore strongly opposed to policy EU9 as worded.
- 3.17 **Transport Infrastructure** - The Council welcomes acknowledgment in the Local Plan that Willesden Junction Station should be delivered as part of the early phase of infrastructure delivery. Willesden Junction Station is a critical commuter station for Brent residents and for many years to come will be the primary public transport gateway to the Old Oak regeneration area. As such, a more detailed timescale is needed to ensure the station is upgraded as part of initial development phases.
- 3.18 The Local Plan should actively encourage improved public transport connections to Old Oak on existing and planned transport infrastructure. The Council welcomes reference to a Crossrail to West Coast Mainline link, providing additional connections to Wembley. Such a link would allow Brent to be better interconnected with the rail network, reduce time savings on travel and ease congestion at Euston.

4.0 Financial Implications

- 4.1 The Local Plan sets out proposed infrastructure priorities, and suggests potential funding sources including Community Infrastructure Levy and Section 106. The Local Plan omits costing for this infrastructure, as this is to be progressed separately through the OPDC Board of which Brent is a member.
- 4.2 The realisation of the Local Plan will result in the creation of public space and social infrastructure, which will have on-going revenue implications and details of this will need to progress through the OPDC board. The majority of infrastructure will be located in the London Borough of Hammersmith & Fulham. It is not envisaged significant infrastructure could be located in parts of the OPDC area falling within Brent, however, the response to the consultation makes it clear that boroughs need to

be closely engaged in infrastructure planning to ensure strategies are in place for on-going management and maintenance.

5.0 Legal Implications

- 5.1 The Local Plan is part of the Government's Planning Policy system introduced by the Planning and Compulsory Purchase Act 2004. Part 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the procedure for producing the Local Plan. The consultation constitutes that required under regulation 18.
- 5.2 Once adopted the OPDC Local Plan, alongside the London Plan, will form the Development Plan for the OPDC area. Brent Local Plan policies will no longer apply to parts of the borough falling within the OPDC area.

6.0 Diversity Implications

- 6.1 The Equality Act 2010 includes a public sector equality duty which requires public organisations and those delivering public functions to show due regard to the need to:
- Eliminate unlawful discrimination, harassment, victimisation;
 - Advance equality of opportunity; and
 - Foster good relations between communities.
- 6.2 Consequently, the Old Oak and Park Royal Development Corporation has undertaken an Integrated Impact Assessment (IIA) incorporating Equality Impact Assessment of the Local Plan, with the objective of ensuring it considers, enhances and supports equality for all. The IIA will be reviewed alongside the Local Plan.

7.0 Staffing/Accommodation Implications

- 7.1 At present the staffing implications for the Council relate to officer time in attending meetings with officers in the OPDC and responding to consultations.

8.0 Environmental Implications

- 8.1 An Integrated Impact Assessment (integrating Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment) has been undertaken and informed the Local Plan.

9.0 Background Papers

- 9.1 Local Plan Draft Regulation 18 Consultation (4 February 2016), Old Oak and Park Royal Development Corporation

Contact Officers

Any person wishing to inspect the above papers should contact Claire Jones, Policy & Projects, 020 8937 5301

LORRAINE LANGHAM,
Strategic Director of Regeneration & Environment



Brent Civic Centre
TEL Engineer's Way
FAX Wembley
EMAIL Middlesex HA9 0FJ
WEB 020 8937 2121
020 8937 5207
cllr.muhammed.butt@brent.gov.uk
www.brent.gov.uk

REF: MDC/BRENT

31ST MARCH 2016

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

Dear Sir Edward,

RESPONSE TO OLD OAK AND PARK ROYAL LOCAL PLAN REGUALTION 18 CONSULTATION

Thank you for the opportunity to comment on the Old Oak and Park Royal Local Plan. Brent Council has commented on early drafts of the Local Plan, and notes considerable progress has been made in its development. However, a number of significant outstanding concerns remain. The Council's key areas of concern are summarised below and a detailed response attached as an appendix. This response is interim, subject to consideration by Cabinet.

General

The introduction of the Local Plan highlights the opportunity development at Old Oak presents for the local area, in terms of overcoming severance and creating employment opportunities. This section should also acknowledge the need for the existing community to have access to services and affordable housing within Old Oak, and for the business community to benefit from supply chain opportunities. It also needs to be acknowledged that without sufficient mitigation and integration the development could have a detrimental impact on the local area, by placing further pressure on the transport network and social infrastructure. The Local Plan needs to be more explicit in setting out how policies will ensure the surrounding communities will integrate with, and benefit from the development at Old Oak and Park Royal, and how potential detrimental impacts will be mitigated. The OPDC mission statement should include explicit reference to supporting the existing community and businesses, not just to participate, but to actively benefit from the regeneration of Old Oak and Park Royal. The Council welcomes the production of a Socio-Economic Regeneration Strategy and Fringe Masterplan, and trusts these will inform the next version of the Local Plan.

Places: Old Oak (Willesden Junction)

Further joint working is needed to set clear guidance for development in and around Willesden Junction station. The redevelopment of Willesden Junction station presents an opportunity to open up connections to the north, and ensure the existing communities and Harlesden Town Centre benefit from the regeneration of Old Oak. At present the development capacity of Willesden Junction is constrained due to the surrounding railway lines. Initial studies indicate due to the spacing of the railway lines there is scope to allow development above the lines. This has significant advantages in terms of supporting the achievement of housing and employment targets, placemaking and creating a stronger link between Old Oak High Street and Willesden Junction. The Council considers development above the railway lines is essential to optimise the potential of this area, and enable commercial development around the station.

In the short to medium term it is important that pedestrian and cycle walkways from Willesden Junction into Old Oak North are of the highest quality and can remain in use when new streets are built. They must therefore be of a comfortable width to accommodate both pedestrians and cyclists.

It is noted the Local Plan currently omits an important connection throughout from Willesden Junction to Harrow Road and Harlesden. This is not consistent with the objective of reducing severance between Old Oak and the surrounding area.

Places: Park Royal

Identifying Park Royal as one place ignores the significant variations in character across the area from large scale industrial units, smaller workshops serving SMEs, office-led development at First Central, the Central Middlesex Hospital and adjoining supported housing, and residential pockets. A more fine grained approach is therefore needed to define the distinct places within Park Royal and set appropriate policy.

Design

The design approach should be led by the objective of creating a sustainable community rather than density. A combination of mansion blocks and taller landmark buildings around transport interchanges would enable density to be achieved whilst on the whole ensuring development at Old Oak is of a 'human scale' with a community feel.

It is noted the majority of the studies which will inform the design chapter are still in development. We would expect the next version of the Local Plan to be informed by these studies and be more specific to the local context.

Affordable Housing

The approach to affordable housing can't be considered in isolation, but needs to be informed by an understanding of CIL viability. Further viability testing is therefore needed to inform the preferred option for securing affordable housing. However, Brent Council would be opposed to any option which does not indicate a target percentage for affordable housing, whether fixed or viability tested. A target is essential to provide a steer to developers, and assists in controlling speculation on land values. Given the timescales Old Oak will be delivered over, there needs to be flexibility to regularly review the approach to affordable housing to ensure levels are maximised.

As the Council has stated from the outset, Brent Council's support for the regeneration of Old Oak is subject to nomination rights for affordable housing for Brent residents. An implication of the regeneration at Old Oak is that it will drive up values in neighbouring areas, it is therefore crucial to mitigate this impact residents are able to access the affordable housing the development will provide.

Harlesden Town Centre

Brent Council strongly object to the proposal for a major town centre at Old Oak. Whilst a town centre is acceptable in principle this is subject to the scale not being shown to have a detrimental impact on Brent's centres. Major town centres, as defined in the London Plan and this Local Plan, have a high proportion of comparison retail and attract a much wider catchment. Such a centre would draw trade from neighbouring centres such as Harlesden, to their detriment. In addition, at present there is nothing in the plan to prevent a significant quantum of retail floorspace being brought forward in early phases to the detriment of both nearby centres and Old Oak High Street. If demand for town centre uses is taken up in early phases, Old Oak High Street will not be realised. This will result in a disjointed connection, and be to the detriment of placemaking.

Recognition is needed that the Retail Study has identified the development of a centre at Old Oak, will impact on Harlesden's growth and the OPDC, working with Brent Council and the Harlesden Forum, must be active in mitigating negative impacts.

Social Infrastructure

Policy S11 suggests social infrastructure will not be secured on-site in earlier phases. To promote Lifetime Neighbourhoods and community cohesion it is crucial social infrastructure is integrated throughout the development. Brent Council has been clear that there is not sufficient capacity to extend existing primary schools in the area to meet additional demand from Old Oak. If it is proposed that social infrastructure will be delivered off site this must be backed up by evidence that there is sufficient capacity to extend existing facilities, and that this approach is supported by providers. Failure to develop a clear strategy to meet infrastructure needs will result in further pressure on existing services in the surrounding area, and ultimately impact on the quality of life of existing and new residents in the area.

Open Space

Old Oak is within an area of open space deficiency, making it essential the Local Plan specifies the quantum of open space needed to meet the needs of the new community. The Plan currently doesn't recognise there will be a need to provide a range of open spaces in terms of size and function. It is expected the next version of the Plan will be informed by the finalised Green Infrastructure strategy, and address this concern.

Extraction of Minerals

Policy EU9 on Extraction of Minerals allows for shale gas fracturing ('fracking') within the OPDC area, subject to the 'consideration' of certain criteria. The process of extracting gas from the ground would result in significant detrimental impacts on local health and amenity, further worsening air quality in an existing Air Quality Management Area, and increasing noise pollution. As such, the promotion of shale gas extraction is not consistent with the promotion of Old Oak as a healthy new town, or the Local Plan objective to improve the quality of life, enhance health and well-being of communities. The Council is therefore strongly opposed to policy EU9 as worded.

Transport Infrastructure

The Council welcomes acknowledgment in the Local Plan that Willesden Junction Station should be delivered as part of the early phase of infrastructure delivery. Willesden Junction Station is a critical commuter station for Brent residents and for many years to come will be the primary public transport gateway to the Old Oak regeneration area. As such, a more detailed timescale is needed to ensure the station is upgraded as part of initial development phases.

The Local Plan should actively encourage improved public transport connections to Old Oak on existing and planned transport infrastructure. The Council welcomes reference to a Crossrail to West Coast Mainline link, providing additional connections to Wembley. Such a link would allow Brent to be better interconnected with the rail network, reduce time savings on travel and ease congestion at Euston.

Brent Council hopes to continue to work positively with the Development Corporation to ensure the next version of the Local Plan fully addresses our outstanding comments, to ensure the best outcomes are secured for the surrounding communities.

Yours sincerely,

Cllr Muhammed Butt
Leader of the Council

CC: Carolyn Downs, Chief Executive
Lorraine Langham, Strategic Director Regeneration and Environment
Aktar Choudhury, Operational Director Regeneration

Appendix

Question Para/Figure/ No.	Comments
Introduction	
I.34	The introduction of the Local Plan highlights the opportunity development at Old Oak presents for the local area, in terms of overcoming severance and creating employment opportunities. This section should also acknowledge the need for the existing community to have access to services and affordable housing within Old Oak, and for the business community to benefit from supply chain opportunities. It also needs to be acknowledged that without sufficient mitigation the development could have a detrimental impact on the local area, by placing further pressure on the transport network and social infrastructure. The Local Plan in general needs to be more explicit in setting out how policies will ensure the surrounding communities will integrate with, and benefit from the development at Old Oak and Park Royal, and how potential detrimental impacts will be mitigated. The Council welcomes the production of a Socio-Economic Regeneration Strategy and Fringe Masterplan, and trusts these will inform the next iteration of the Local Plan.
Figure 8	The key omits reference to Ealing Town Centre.
Spatial Vision & Objectives	
QVO2	<p>It would be beneficial for the mission statement to include reference to achieving the '<i>highest standards of design and sustainability</i>', to be consistent with the wider objectives of the Local Plan.</p> <p>The mission statement should include explicit reference to supporting the existing community and businesses, not just to participate, but to actively benefit from the regeneration of Old Oak and Park Royal.</p>
Figure 10	The boundary for Old Oak High Street included in the key diagram encompasses a significant area. Brent Council is concerned such a high quantum of town centre uses will have a detrimental impact on the viability of Harlesden Town Centre. In addition, it is questioned if there is sufficient demand to support commercial uses over such an extended area, or if this will result in vacant units. The need for a more focussed town centre is discussed further in relation to the town centre chapter.
QVO3	Reference to the need to fully connect to the surrounding area is welcomed. The objective should refer specifically to the need to redevelop Willesden Junction station, as this is critical to linking Old Oak to communities to the north, including Harlesden and Stonebridge.
Figure 13	It would be beneficial for the land use diagram to include proposed locations of open space.
3.18	Typo – <i>new and improved connections</i> .
OSP3	Given that, as acknowledged, creating strong connections will be fundamental to the successful regeneration of the area; it is considered the current policy wording is not sufficiently strong. The wording ' <i>OPDC will support proposals</i> ' should be strengthened to ' <i>proposals will be required to deliver</i> .' The policy should require connections to be delivered at the earliest stage to enable development.
Figure 16	Figure 16 omits a number of key connections, including the connection to Park Royal station and to Harrow Road via Willesden Junction. As acknowledged elsewhere in the Local Plan, it is crucial to improve links to Park Royal station

	to promote the use of public transport and take pressure off the road network in Park Royal. In addition, if residents in Harlesden are to benefit from the regeneration of Old Oak, the current connection between the station and Harrow Road, and on to Harlesden High Street needs significant improvement. This is recognised in the adopted Opportunity Area Planning Framework
OSP4	Supporting text should provide clarification as to what is meant by ‘ <i>key destinations</i> ’ and ‘ <i>contribute to placemaking</i> ’ as this is open to interpretation.
Figure 18 & 3.23	It is stated that to achieve the housing target for Old Oak, development will need to exceed the standards in the London Plan’s density matrix. However, an alternative option which needs to be fully explored is the scope to optimise development by bridging over the West Coast Mainline to enable the comprehensive development of Willesden Junction. At present the development capacity of Willesden Junction is constrained due to the surrounding railway lines. Initial studies indicate due to the spacing of the railway lines there is scope to allow development above the lines. This has significant additional advantages in terms of placemaking and creating a stronger link between Old Oak High Street and Willesden Junction.
OSP5	The policy wording ‘ <i>proposals over a certain size will be encouraged to submit a meanwhile strategy</i> ’ is considered too vague. In accordance with paragraph 3.30 it should be a requirement for developers to submit a meanwhile strategy. It is Brent’s experience that even major developments at the smaller end of the scale, present opportunities for meanwhile use. It is therefore strongly recommended all major developments should be required to provide a strategy, with the level of detail in the strategy being proportionate to the scale of development.
The Places	
4.24	Should state railway lines to the ‘ <i>east with Scrubs Lane beyond</i> ’, rather than west.
4.26	Typo – ‘ <i>a mix of town centre and catalyst uses,</i> ’ rather than ‘ <i>a mix of town centres.</i> ’
4.28	The vision needs to emphasise the retail offer in Old Oak North is to serve the new population, and make specific reference to complementing the offer at Harlesden Town centre.
Figure 29	<p>Further detailed work is needed to resolve the indicative layout of development around Willesden Junction station, as currently this is unclear. At present figure 18 and supporting text indicate there will be taller elements of the development to the south of Willesden Junction station, but this is not reflected in figure 29 which identifies this location as a pedestrian route. It is not clear from figure 29 where development could be accommodated. Further detailed discussions are needed with Brent Council, the OPDC and Harlesden Neighbourhood Forum to identify a stronger vision for this area. As discussed, a more ambitious option incorporating further bridging over the West Coast Mainline, would result in a more comprehensive scheme which could accommodate a higher level of development and improve connectivity. This will also improve safety and natural surveillance as streets overlooked by buildings are much safer than pedestrian walkways which have few escape routes.</p> <p>In the short to medium term it is important that pedestrian and cycle walkways from Willesden Junction into the Old Oak site are sustainable and can remain in use when the new streets are built. They should therefore be of</p>

	<p>the highest quality, well landscaped with good lighting, permeable surfaces, SUDS, seating and a comfortable width space to accommodate pedestrians and cyclists. There should be plenty of connections to the local area offering escape routes rather than long stretches of walkway which feel unsafe. The New York High Line and East London's Greenway are good examples which should be used as benchmarks for all routes.</p> <p>Figure 29 suggests there will be no pedestrian links from Willesden Junction to the east towards Harrow Road, Harlesden and Kensal. It is assumed this is an omission and there should be a route highlighted above the white dashed line.</p> <p>It's assumed the boundary to the north of Willesden Junction is identified as a sensitive edge but this is not clear in the figure.</p>
P2	<p>Transport - In addition to facilitating an enhanced Willesden Junction station, as set out above, development should be required to improve connections to the station both in the short, medium and long term. The policy should also require development to facilitate the delivery of bus, cycle and pedestrian routes throughout the development. This will be essential to ensure Old Oak is well connected to the surrounding area.</p> <p>Open Space - Old Oak is within an area of open space deficiency; therefore it is essential the policy specifies the quantum of open space needed to provide sufficient access to the new community. The provision of sufficient open space will be a key component of place making.</p>
4.38	<p>Brent Council supports the aspiration for the new bridge over the West Coast Mainline to be vehicular. A bus route would provide benefits in terms of linking Old Oak to the surrounding area, and ensuring communities on the fringe of Old Oak benefit from the regeneration. It also has advantages in terms of placemaking and creating a safe and well used route. It is not necessary to state in a policy document delivery of a vehicular bridge will be challenging. Given the scale of infrastructure needed to bring forward Old Oak and the significant shift from industrial to residential, the development as a whole presents challenges.</p>
QP2d	<p>The scale of the open space should be informed by the emerging Green Infrastructure Study. Subject to the findings of the study, Brent Council is of the view that as the north of Old Oak is currently deficient in open space, a large space is required to address need. Larger open spaces allow for a wider range of recreational and sporting activities, and thus promote both mental and physical health and well-being. The majority of residential development is to be located to the north of Old Oak, over 500m from Wormwood Scrubs the closest significant open space. Wormwood Scrubs is remote from parts of Old Oak and Park Royal and isolated by a railway line. So it is questionable whether this existing green area can be counted as providing open space within the proposed development area.</p>
QP2e	<p>It is essential development provides a continuous walking and cycling route along the canal both to maximise the recreational opportunities the canal presents, and to improve connectivity between Old Oak, Park Royal and Alpertown Growth Area.</p>
QP2f	<p>As discussed above the option of bridging over the West Coast Mainline would significantly increase the development capacity of the area.</p>
QP2h	<p>Heritage assets in Old Oak North. Brent Council supports the Local Listing of Car Giant, 44-45 Hythe Rd, London NW10 6RJ (the former Rolls-Royce</p>

	Motors building of 1939). The building is significant to the history of the area and has architectural importance with its Art Deco design – brickwork, stone columns, feature panels and original metal framed windows.
4.49	For clarity the vision should state ' <i>linking Harlesden via Willesden Junction to Old Oak Common Station.</i> '
4.50	<p>Brent Council objects to the designation of Old Oak as a major centre. The reason for the objection will be covered in detail under comments on the Town Centre chapter.</p> <p>Reference to town centre uses drawing people to the OPDC area from afar is at odds with the recommendations of the Retail and Leisure Needs Study. To ensure the development of Old Oak town centre is not to the detriment of the existing town centre hierarchy the retail offer is to be of a scale and offer to serve the new community. This needs to be clarified here.</p>
P3	The policy refers to a 'significant quantum' of A-class uses. This is open to interpretation. For example it could suggest a scale of retail development akin to a new Westfield shopping centre. For clarity the policy should cross reference the level of floorspace identified in the Retail and Leisure Needs study. To accord with the London Plan the policy should also include specific reference to maintaining the existing town centre hierarchy.
QP3b	<p>The character areas identified assist in establishing the differing functions of each part of the high street. However, Old Oak High Street covers a significant area, being approximately half the length of Oxford Street. Brent Council is concerned, in the context of increased online spending and a projected decline in retail floorspace demand, that there will be insufficient market demand for commercial uses to extent the length of the high street. The implication could be blank frontage, which will impact on connectivity and the quality of environment between Willesden Junction and Old Oak. A more detailed study of character areas within the high street needs to be undertaken to consider:</p> <ul style="list-style-type: none"> • Given the timescales for development and changing shopping behaviour, what is the potential future role of the high street? • Grand Union Street and Grand Union Canal – will there be sufficient demand for these streets to comprise secondary frontage? • Is it realistic for active frontage to extend along the length of the canal or could this be interspersed with residential ground floor uses? • Should demand change, how will the Local Plan enable flexibility?
P4	<p>The Council suggests that one canalside space be defined as an urban square with hard surfaces and active retail/cafe uses, potentially where Old Oak High Street crosses Grand Union Canal. Other canalside spaces, including one or two marinas with new basins could be created, these should be defined as green open spaces surrounded by residential buildings. There would be potential to link surface water Sustainable Urban Drainage Systems (SUDS) schemes into the canal at these points and enhance habitat creation opportunities. The Council supports the promotion of moorings.</p> <p>The towpath of the Grand Union Canal will become very busy with potential for conflict between boaters, anglers, cyclists, pedestrians, dog walkers and adjacent new residential occupiers. Potential for additional parallel routes needs to be explored at initial design stages and possible routes on the offside of canal.</p>

4.74	<p>This sentence seems out of context. Is it referring to the extant permission? <i>'At the western edge, the former Twyford Tip site benefits from an implemented planning permission.'</i></p> <p>Reference is included to Central Middlesex Hospital being within Park Royal neighbourhood centre. The neighbourhood centre designation relates to land within Ealing and currently does not include the hospital. Is the proposal to amend the designation to include the hospital?</p>
P5	<p>Identifying Park Royal as one place ignores the significant variations in character across the area. The character of Park Royal varies significantly from large scale industrial units, smaller workshops serving SMEs, office-led development at First Central, the Central Middlesex Hospital and adjoining supported housing, and residential pockets. A more fine grained approach is therefore needed to define the distinct places within Park Royal. The Park Royal Atlas should be a starting point to identifying the character across the area.</p> <p>Open Space - Park Royal is currently a dense built form of industrial buildings with pockets of residential development. The resulting area lacks open (green and urban) spaces. A solution might be to draw 400m walking distance radii from each of the residential areas. The intersection of these radii would determine the most appropriate areas for 'places' whether they are green or urban squares. The London Plan provides guidance on size of open spaces but the 0.4 km radius catchment area for local parks and 1.2 km catchment for larger parks has become the rule-of-thumb for assessing the distribution of open spaces in urban areas. The standard of 0.2 ha minimum local park size is also widely used (Chesterfield (2002:19).</p> <p>Connecting routes and opportunities for activity - Residential developments in Park Royal is poorly connected to Old Oak. Development should seek to connect residential areas and tube stations in Park Royal though improved streets with mixed use frontage to ensure daytime and night-time activity, making areas feel safer at all times of the day as well as creating an improved community environment. This commercial frontage could take the form of facilities serving workers, such as the cafes and restaurants which already exist in Park Royal, or ancillary outlets form the existing food and beverage industries within Park Royal. The retail/ leisure park at Park Royal is also an opportunity for redevelopment as an improved mixed use commercial centre and quality place.</p> <p>Amenity impacts – in identifying locations for employment uses the Plan should seek to address the impact on amenity of existing residents. For example by seeking to locate light industry closer to residential than heavy. Businesses requiring the use of large articulated vehicles should be located closer to the main arterial roads rather than on narrower streets as this causes congestion. In assessing impact on amenity consideration should be given to the odour from food industry places, which causes a nuisance to residential properties.</p> <p>Permeability - The railway lines create severance between Park Royal and the north and the surrounding tube stations. Increased connections across the railway are needed to reduce reliance on the car and increase walking and cycling.</p>

	<p>Proposed town centre - The 'town centre' for Park Royal is proposed to be on the current Asda site. However, this area does not receive significant footfall and access is largely dependant on private car. As highlighted above it would be preferable for commercial uses to extend along transport routes toward transport interchanges. These areas attract higher footfall and have the advantage of improving feelings of safety by activating the street. There is a need for smaller units offering community and town centre uses.</p> <p>Leegate Shopping Centre in Lewisham could be considered as an example of a redevelopment of a large supermarket. The scheme includes smaller retail units and car parking on the ground floor, a podium level garden above the car parking level. Although the Lewisham scheme includes residential within the Park Royal context consideration could be given to a redevelopment including commercial uses.</p>
Figure 39	The key includes public civic spaces, but these spaces are not highlighted on the figure.
QP5b	Reference is made to delivering workspace for small and micro businesses around stations. It would be beneficial for the Plan to identify these locations as smaller scale places.
QP5d	Brent Council supports the modification to the Strategic Industrial Location boundary providing an appropriate buffer is provided in proximity to residential uses.
Figure 44	A clear boundary for Park Royal centre is needed. It is unclear if it is proposed the centre is inclusive of Central Middlesex Hospital.
QP6b	The option of restricting residential development within the town centre is dependant on the extent of the proposed town centre boundary. Extra care units which benefit from proximity to Central Middlesex Hospital are located off Victoria Road. Therefore a policy to retrospectively restrict supported accommodation in this area would not be implementable or supported by Brent Council.
QP6c	Historically larger employers provided facilities such as crèches, gyms and community centres. As this is no longer the case these facilities need to be integrated into the town centre. In particular the provision of affordable childcare is a significant barrier to access to the workplace. The Local Plan should promote provision of crèche facilities within the centre.
Sustainable Development	
SD I	The policy applies to sustainable development in the sense of the presumption in favour of sustainable development as set out in the NPPF, rather than the common interpretation which is environmental sustainability. For clarity it would be beneficial to highlight policies related to environmental sustainability are included in the Environment & Utilities chapter.
Design	
General	<p>It is noted the majority of the studies which will inform the design chapter are still in development. We would expect the next iteration of the Local Plan to be informed by these studies and be more specific to the local context.</p> <p>There is opportunity to create a community which is more about 'streets and places' rather than high density development. It is debated that a return to perimeter mansion blocks (8-12 storeys maximum) creates this community feel rather than clusters of tall buildings (>30m) currently being developed in</p>

	<p>Nine Elms, London. The tallest mansion blocks could be located on the main routes throughout the site, reducing in size along secondary routes and reducing again next to sensitive areas such as existing terrace housing along the boundaries of the development site. There is the possibility for landmark (taller) buildings around transport interchanges which would comply with the London Plan, but on the whole development should be lower scale (yet still high density) across the site to encourage the 'human scale' community feel. This could be achieved with maisonettes or townhouses on the ground floor (with their own front doors on the street) and flats above. This should be interspersed with commercial activity at appropriate locations to encourage community spirit and vitality on the street at all times of the day.</p> <p>Building materials should be high quality and natural such as brick and stone. Non-traditional materials such as rain screen cladding should be kept to a minimum for example as accents on a building which complement the dominant building material. Design codes should be developed alongside the masterplan to ensure that there is a cohesive design for the whole area for example same materials and street furniture used throughout the public realm as well as materials for the buildings themselves. Different architects should be employed for each site to create variety in the streetscape.</p>
D1	For the policy to be locally specific it would be helpful for supporting text to highlight the positive elements of the existing area, such as the canal, former Cumberland Park Factory, Rolls Royce building and other heritage assets.
D2	<p>Improved public realm is very important for the existing environment as well as the new Old Oak development. Design codes should be drawn up as well as masterplans to ensure the whole area has a cohesive public realm scheme, with coordinated street furniture, wayfinding and paving throughout. This will unify the old and new.</p> <p>Within Park Royal pavements need to be widened to meet inclusive mobility standards and enable tree planting. Public realm improvements are needed around Harlesden and Stonebridge Park stations, including wayfinding and lighting, to improve connections and ensure existing residents benefit from the regeneration.</p> <p>To accord within the London Plan policy 5.10, policy D2 should include a requirement for streets and public realm to incorporate urban greening, and where appropriate SUDS.</p> <p>It is also good practice for streets to be designed to promote the use of sustainable modes of transport, and reduce the dominance of private vehicles. Given the pressures on the existing road network at Park Royal this is particularly relevant in the Local Plan area, and additional criteria should be included in the policy.</p> <p>With a large amount of new public realm and landscaping proposed, the borough councils will need a maintenance dowry to look after this in future years. The councils may not have sufficient resources to adopt new landscaping.</p>
QD2a	It is not clear which figure this question refers to. If it is in reference to Figure 16 this omits a number of key connections, including the connections to Park Royal station and Harrow Road via Willesden Junction.

6.25	The All London green Grid Area Frameworks are also relevant, which provide a more detailed assessment of opportunities for green infrastructure at a regional level.
D3	<p>A lot is said about ‘Green Infrastructure’ yet very little about actual open spaces, parks, squares, amenity space. Within development areas we need clearly defined public open spaces of well-defined shape, urban squares, public garden squares, small pocket parks, medium sized local parks and one large district park. These should be provided in addition to any network of linear spaces along railway lines and Grand Union Canal. The Places Chapter includes indicative locations for open space which are liable to change as development comes forward. To ensure sufficient open space is delivered to address need it is essential the Local Plan also identifies the quantum of space to be delivered within indicative locations.</p> <p>Further clarity is needed on what is meant by temporary public open space. It must be clear that this is not a substitute for permanent open space.</p> <p>To be consistent with the All London Green Grid the policy should state the canal will be enhanced as a biodiverse corridor.</p>
Figure 64	<p>To ensure the development will not result in open space deficiency, this figure should be informed by the open space benchmarks in table 7.2 of the London Plan, which identifies a suitable buffer zone based on the categorisation of open space.</p> <p>Figure 64 should distinguish between open green space and civic space.</p> <p>The canal does not appear to be identified as an open space in the figure.</p>
QD3a	As stated above the policy currently doesn’t recognise there will be a need to provide a range of open spaces in terms of size and function. The Plan should define the forms of open space to be delivered in line with the London Plan categorisation. E.g. district park, local park, small open space, pocket park or linear open space.
QD3b	There needs to be an appropriate balance between private and public open space. It is of concern that at present the Local Plan includes no reference to amenity space standards. Given the density of development proposed amenity space will be crucial to ensure development provides suitable amenity and quality of life.
D4	<p>To strengthen policy, suggest amending wording to ‘<i>be mindful of their surrounding context and seek to <u>improve the character and quality of the area.</u></i>’ This is consistent with the NPPF.</p> <p>London Plan policy 7.7 contains a more extensive range of criteria to be considered in assessing applications for tall buildings. Although it is not necessary to repeat in this policy it would be beneficial to cross-reference here or in the supporting text.</p>
Figure 70	<p>Roundwood Park and King Edward VII recreation ground should be highlighted as public open space.</p> <p>Omits Green Man Public House, High Road, W10 and 842 Harrow Road which are Grade II listed. In addition Kensal Green Cemetery is a Grade I Listed Park & Garden, whilst Roundwood Park is a Grade II listed Park & Garden.</p>

QD4a	It would be beneficial to set out the information applicants proposing tall buildings will be required to provide to assist in determining planning applicants. For example wind, daylight and sunlight studies. Given that such studies are essential to determining the suitability of any design they should be required from the outset and inform pre-application discussions.
D5	<p>Suggest small amendment to part B i) to '<i>relate sympathetically to the upper parts of the building, <u>adjoining properties</u> and the part of the shop front to be retained.</i>'</p> <p>It would also be beneficial for the policy to include an additional point around servicing and security features integrating with and complementing the building.</p>
D6	<p>The Council supports policy D6 and the principle of conserving and enhancing heritage assets. The Council would like to highlight the Grand Junction Arms Public House on Acton Lane as a heritage asset, which should be locally listed. Elements of the building date from the original Grand Junction Railway Inn beer house of 1861. It was updated in the inter-war period with a new façade and features a central pediment and green glazed blocks. It is a landmark building.</p> <p>Other buildings that should be Locally Listed include:</p> <p>Stonebridge Station - The line serving the station was opened by the London and North Western Railway as part of their 'New Line' project on 15 June 1912 and was first used by Bakerloo line trains on 16 April 1917. Intact. Pretty pavilion-type building in red bricks with stone dressings and window surrounds.</p> <p>Willesden Junction Railway Station - The 'Willesden New Station' or Low-Level station on the Watford DC Line was opened in 1910. Simple pavilion building in red brick, stone dressings and slate roof. Decorative bracketed canopy to entrance.</p> <p>Kolak Snackfood Ltd, 308-310 Elveden Road – two symmetrical industrial buildings from the inter-war period. Nicely detailed, Art Deco in style, the front entrance blocks (only) with streamlined windows and flag poles contribute to the streetscene.</p> <p>In addition, the Council would support the extension or introduction of a conservation area to encompass the remainder of the Grand Union Canal. This should also take in the Grand Junction Arms and the road bridge as they both form part of the history of the canal side setting.</p>
QD6a	Brent Council supports the designation of the Cumberland Factory Conservation Area. The former Cumberland Factory buildings are an important legacy of the industrial heritage of Old Oak, and contribute positively to the character of the area. As demonstrated by the Kings Cross Granary Square development, the retention of such industrial buildings can contribute to creating a sense of place and support successful regeneration.
D7	High density development can present particular challenges in terms of microclimate, wind turbulence and overshadowing, which can impact on the usability of amenity and open space. Therefore Policy D7 should include an additional criteria stating amenity and open space provided as part of developments must provide a usable and comfortable environment.
6.72	Lifetime Homes has now been superseded by Building Regulations requirement

	M4 (2) 'accessible and adaptable dwellings'.
Housing	
General	<p>The chapter omits reference to temporary accommodation to meet a statutory need.</p> <p>The next iteration of the Plan needs to consider the implications of the Housing & Planning Bill, particularly starter homes.</p>
7.5	Text is missing from the end of the paragraph.
QH2b & c	The Council questions on what basis it is suggested development of First Central site within Park Royal would not come forward until 2022 and 2037. Initial phases of office and residential development have already been delivered on the First Central site, and the infrastructure needed to support further development is not of the scale of that needed in Old Oak. In addition it is not constrained by the delivery of Old Oak Common Station. Further development could therefore reasonably come forward in the period 2017 to 2021. This would also assist in the OPDC five year deliverable housing supply.
QH2d	As set out in previous comments there is scope to optimise development by bridging over the West Coast Mainline to enable the comprehensive development of Willesden Junction
H3	The need for a high proportion of family housing is reflective of the findings of the Brent Strategic Housing Market Assessment. It is noted this brings challenges in high density developments, related to affordability and purchaser preferences for a house with a private garden.
H4	<p>Further viability work is needed to ascertain which option best enables the delivery of 48% affordable housing, the level of need identified in the OPDC Strategic Housing Market Assessment. The approach to affordable housing can't be considered in isolation, but needs to be informed by an understanding of CIL viability. In addition, the full implications of the Planning and Housing Bill, in particular the introduction of Starter Homes will need to be understood. The Council wishes to be engaged in discussions as to the preferred option further once further detailed work is available.</p> <p>Brent Council would be opposed to an option which does not indicate a target percentage for affordable housing, whether fixed or viability tested. A target is essential to provide a steer to developers, and assists in controlling speculation on land values. On this basis it is considered option 4 is the least suitable. Option 2 will discourage mixed communities, and therefore is not considered consistent with wider policy objectives.</p> <p>In addition to the options outlined, the OPDC should explore the use of the 'flexi-rent' model, whereby the Affordable Housing provision for individual sites can be reviewed and adjusted, on an open book basis over time, in order to optimise the Affordable Housing whilst protecting the scheme's viability. The policy should also set clear guidance on the social to intermediate housing split, informed by the Strategic Housing Market Assessment. In the Brent context a target of 60:40 social intermediate split has been applied, which is more reflective of local housing needs than the London Plan target of 70:30.</p> <p>Given the timescales Old Oak will be delivered over, there needs to be flexibility to regularly review the approach to affordable housing to ensure levels are maximised.</p>

	As the Council has stated from the outset, Brent Council's support for the regeneration of Old Oak is subject to nomination rights for affordable housing for Brent residents. An implication of the regeneration at Old Oak is that it will drive up values in neighbouring areas, it is therefore crucial to mitigate this impact residents are able to access the affordable housing the development will provide.
H6	Supporting text to the policy needs to clarify what is meant by an appropriate location for Private Rented Sector (PRS). In the interests of creating a mixed and balanced community Brent Council's preference is for PRS to be distributed across Old Oak rather than concentrated in one location.
7.55	Encouraging developers to offer deposit saving PRS options is an interesting concept, however, it is not clear how policy H6 will ensure this is achieved. Suggest encouragement is incorporated into policy wording.
QH10a	To ensure the delivery of student housing does not compromise local housing needs a target should be identified. In addition, the policy should define what would constitute an overconcentration of student accommodation. For example the Wembley Area Action Plan set the cap of 20% of projected population growth over the plan period. This was informed by the point at which provision would impact on achieving targets for conventional housing, and also regard for the population mix.
Employment	
QE1a	In seeking to attract new businesses to the area the OPDC should have regard to the LEP Jobs and Growth Plan, which highlights the opportunity for clusters of creative, tech and digital industries in Park Royal.
E2	Policy E2 states a range of flexible open workspace typologies should be provided in locations identified in the Places Chapter, however, with the exception of Old Oak Station the Places Chapter does not identify locations for these uses. To ensure flexible open workspace is secured, and help mitigate the impact of the significant loss of employment land, the Local Plan needs to be more specific as to where these will be delivered. Within Old Oak North open workspace suitable for SMEs should be secured at Willesden Junction Station and Cumberland Park Factory.
Alternative Policy Option	<p>From the wording of E2 it is not clear that the intention is to focus BI (a) uses in and around Old Oak Common station and BI (b) and BI (c) uses in Old Oak north, as set out in the Places chapter. For ease of reference clarification is needed.</p> <p>Policy P2 of the Places chapter refers to BI (b) and BI (c) uses being located adjacent to transport and utilities infrastructure. Given that Old Oak north is to deliver the majority of residential development, unless carefully managed, this approach could impact on residential amenity. The policy needs to be more explicit as to where BI (b) and BI (c) uses should be located. These uses could form a transition between Scrubs Lane Character area, including the Former Cumberland Factory area, and Old Oak North. In this location these uses could usefully form a buffer, which would help to mitigate the impact of noise from Scrubs Lane, in addition to providing much needed employment space.</p> <p>BI (a) is a main town centre use, which would be appropriate along Old Oak high street and should not be confined to Old Oak station.</p>
E3	The site numbers need to be cross-referenced in figure 86.

	<p>The policy should include criteria to ensure where SIL borders residential area, a suitable buffer and mitigation is provided to prevent negative impacts.</p> <p>Policy should include guidance as to where floorspace suitable for SMEs should be concentrated.</p> <p>Point (e) – it is unclear what is meant by appropriate town centre uses. The London Plan promotes residential in town centre uses, therefore this policy could result in residential uses in close proximity to SIL.</p>
Figure 88	Figure needs to include site numbers for proposed additional SIL sites.
8.27	This paragraph supporting ancillary uses such as retail, meeting, eating and drinking places is not reflected in policy E3. Rather than ancillary, to be consistent with the London Plan reference should be made to walk to facilities which serve the needs of businesses.
E4	Brent Council strongly supports this policy. Given a secondary impact of the regeneration of Old Oak is likely to be development pressure on workspace suitable for SMEs, it is crucial the Local Plan ensures redevelopment results in re-provision of affordable workspace. This policy will be important in mitigating the impact of loss of employment land at Old Oak.
E5	Brent Council strongly supports the commitment to maximising access to employment, skills training and preemployment support.
General	The Local Plan omits policy on work-live development.
Town centre	
TC2	<p>Town Centre Hierarchy</p> <p>Brent Council strongly object to the proposal that Old Oak High Street is a major town centre. Major town centres, as defined in the London Plan and this Local Plan, have a high proportion of comparison retail and attract a much wider catchment. Such a centre would draw trade from neighbouring centres such as Harlesden, to their detriment. London Plan policy 2.15 states changes to the town centre network should be coordinated strategically with relevant planning authorities. In discussion on the network and associated retail study there has been agreement that the retail offer of the centre at Old Oak will be primarily a convenience offer to serve residents and employees. This is not reflected in TC2. The policy has not been coordinated with Brent Council or regard for the existing network.</p> <p>Consideration also needs to be given to the impact a higher proportion of retail floorspace will have on achieving housing targets.</p> <p>Town Centre Boundary</p> <p>The Local Plan does not set a clear town centre boundary. The Old Oak places chapter indicates potential locations for town centre uses, and indicates the highest concentration of retail uses will be in Old Oak South, however, this is not reflected in policy TC2. There is nothing in the plan to prevent a significant quantum of retail floorspace being brought forward in early phases to the detriment of both nearby centres and Old Oak High Street. If demand for town centre uses is taken up in early phases, Old Oak High Street will not be realised. This will result in a disjointed connection, and be to the detriment of placemaking.</p>

	<p>Retail Impact Assessment</p> <p>The adjoining Harlesden town centre has a high proportion of small shop units. The average size of convenience retail units in Brent's district centres is 215 sqm and 154 sqm for comparison. Meaning even a relatively small out of centre retail development could have a significant impact. In this context the threshold of 5,000sqm and 2,500sqm is not appropriate. The threshold has not been set with consideration for scale relative to town centres or cumulative effects, it is therefore not consistent with Planning Practice Guidance. As a minimum a threshold of 500sqm should be set.</p> <p>Option 3 (a district centre at Old Oak South and local centre at Old Oak North) combined with a Strategic Cultural Area designation, would minimise impacts on town centres consistent with NPPF. The designation of two centres will also have benefits in ensuring retail development is distributed across the area, and better support placemaking.</p> <p>Summary</p> <p>Designation of major centres must be undertaken at a strategic level, and cannot be designated through this Local Plan. As acknowledged in paragraph 9.12 the town centre hierarchy at major centre level can only be designated through the London Plan. At this stage the Local Plan should identify a district centre at Old Oak. A decision as to whether the centre should become a major centre, should be taken through the London Plan review. This approach allows a fuller consideration of the wider town centre hierarchy. It will also ensure earlier phases of development are not overly dominated by retail floorspace, at the expense of achieving residential targets.</p>
9.13	Old Oak does not need to be designated as a major centre to provide culture, sport and leisure facilities. Designation of a Strategic Cultural Area would be a more appropriate mechanism to promote the area for such uses.
9.14	Recognition is needed that the Retail Study has identified the development of a centre at Old Oak, will impact on Harlesden's growth. It needs to be clear that the OPDC working with Brent Council and the Harlesden Forum will be active in mitigating negative impacts.
TC3	<p>The requirement to provide a Retail Vision Statement is supported. The statement should set out how the development will complement the existing town centre hierarchy, and must be required from the outset to allow full consideration of the impacts of the development.</p> <p>The NPPF requires planning policies to provide clear guidance as to how a decision maker should react to a development proposal. With this in mind, policy TC3 should set clear policy as to what constitutes an overconcentration of betting shops, pay-day loan shops and games arcades. It should also set a clear limit on the proximity of takeaways to schools. OPDC may wish to consider Brent Council's emerging policy DMP 3 which sets a limit of 400m between schools and A5 uses. This buffer was informed by a study of takeaways consumption of local school students.</p>
TC4	For the reasons outlined in response to policy TC2 it is considered the quantitative need should be broken down further to identify how this will be distributed across Old Oak, and prevent the majority of floorspace being delivered in early phases as the expense of wider placemaking across Old Oak.

9.43	A threshold is needed to identify when a Town Centre Enhancement Strategy will be required.
TC6	Policy should also include reference to ensuring visitor accommodation does not compromise the supply of conventional homes. Policy should also be clear that visitor accommodation cannot become permanently occupied, and conditions will be applied accordingly. Brent Council has experienced problems with schemes consented as 'apart hotels,' which do not meet residential spacing standards, subsequently being advertised as permanent residential necessitating enforcement action.
TC7	Policy should acknowledge there is potential for a more flexible approach to opening hours in Park Royal, to serve buildings which operate 24 hours. This approach would also result in benefits in improving feelings of safety.
Social Infrastructure	
Si1	<p>Currently the policy is not sufficiently robust as it does not provide clear criteria as to when existing social infrastructure will be safeguarded. It would be beneficial for supporting text to include criteria setting out how it will be determined if social infrastructure meets a need. This assessment should include consideration of:</p> <ul style="list-style-type: none"> • Consultation with service providers and the local community • details of alternative social infrastructure in the locality which meets the need in a different way or in a convenient alternative location; • vacancy and marketing data; • the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use has been fully considered; • redevelopment is part of an agreed programme of social infrastructure re-provision to ensure continued delivery of social infrastructure and related services, as evidenced through a service delivery strategy.
10.6	The sentence ' <i>Within later phases, it is anticipated that social infrastructure will need to be provided on-site</i> ' suggests social infrastructure will not be secured on-site in earlier phases. To promote Lifetime Neighbourhoods and community cohesion it is crucial social infrastructure is provided throughout development and not just as part of later phases. Social infrastructure covers a wide range of facilities, including smaller scale facilities such as play space, which will need to be embedded within each phase of development. For clarity this sentence should be removed.
Alternative policy option	Again this text suggests the intention is that social infrastructure will not be delivered on-site as part of earlier phases. Brent Council has been clear that there is not sufficient capacity to extend existing primary schools in the area to meet additional demand from Old Oak. It is not clear which existing facilities are to be expanded. If it is proposed that social infrastructure will be delivered off site this must be backed up by evidence that there is sufficient capacity to extend facilities. Failure to do so will result in further pressure on existing services in the surrounding area, and ultimately impact on the quality of life of existing and new residents in the area. Until it is resolved the Local Plan fails to ensure that adequate social infrastructure provision will be made to support development, and therefore is not consistent with London Plan policy 3.16 and the NPPF.
QSI2a	To give developers a clear steer and ensure an all through school delivered it is crucial the next iteration of the Local Plan identifies a site for an all through school. As parts of Old Oak falling within Brent are dominated by rail infrastructure there is not a site of sufficient capacity within the borough which could support an all through school in the timescales.

10.2	It would be beneficial to cross-reference that to promote the area as a healthy new town, major developments will be required to be supported by a Health Impact Assessment. This is consistent with the OPDC validation checklist.
10.21	There are some omissions from this list notably community nursing and therapies, diagnostics and public health services. These should be referenced here, or text should be amended to ' <i>including, but not limited to,...</i> '
SI4	This largely repeats policy SI1.
10.31	It is incorrect to say the NPPF includes nothing explicit on the protection of public houses. Paragraph 70 of the NPPF recognises public houses are community facilities and states planning policies and decisions should plan positively for their provision and use to enhance the sustainability of communities.
SI5	Given that there is such limited provision of public houses across the OPDC area, 3 public houses within approximately 868ha, this policy needs to be strengthened further. The Grand Junction Arms public house within Park Royal falls within Brent. The Council considers this to be of heritage significance which as set out previously the Council feels is worthy of local listing. Many public houses, such as the Grand Junction Arms, make an important contribution to the character of the area in terms of both their appearance and function. Planning Inspectors are increasingly acknowledging the contribution a public house use can make to the character of an area, as referenced by a number of recent appeal decisions in Kensington and Chelsea. A further criteria is needed in the policy to ensure any proposed alternative uses would not detrimentally affect the character of the area and retain as much of the building' defining external fabric and appearance as a public house as possible.
10.34	Reference to CAMRAs Public House Viability test is welcomed, however, to comply with the guidance it should be noted that applicants should also be required to demonstrate they have considered diversification options to enable the retention of the public house. This could include changes to allow uses which complement the function of the public house, such as visitor accommodation or a restaurant.
Transport	
T1	The policy needs to state that development coming forward in advance of new stations and station redevelopment should be designed to support the delivery and connection to the street and route hierarchy. Development which would jeopardise the future achievement of the route hierarchy should be refused. It should also be a strategic principle for development to integrate with and create connections to the surrounding area.
Figure 102	Figure 102 suggests there will be no pedestrian links from Willesden Junction to the east towards Harrow Road, Harlesden and Kensal. As discussed previously this link is crucial to strengthen connections to the east, towards Harlesden Town Centre. An upgraded route needs to provide a higher quality environment and improve feelings of safety.
QT2a	As above.
Figure 110	The figure omits parts of the existing cycling network, including route 45 which runs to the north along Tubbs Road connecting the area to Wembley and Wealdstone and Notting Hill to the south.
QT3a	There is a lack of cycling connections to the tube stations on the periphery of Park Royal. Within Park Royal there are disjointed cycle routes along Rainsford Road and part of Lakeside Drive. There is also an issue of routes

	being gated. The Local Plan should seek to create a connection between these routes, to address severance.
T4	To be consistent with text elsewhere in the Local Plan policy must clarify it is not just capacity improvements needed to Willesden Junction station, but a wider station upgrade.
11.31	Park Royal Transport Strategy identifies the need to improve permeability to the station in Park Royal but this isn't reflected elsewhere in the chapter.
T5	It would be beneficial for the next iteration of the Local Plan to include a diagram indicating potential bus routes and how connectivity between Old Oak Park Royal and the wider area will be improved.
11.40	Although there will be a need to create connections to new rail stations this should not be at the expense of connections to existing stations.
Figure 113	Brent Council strongly supports the Crossrail to the West Coast Mainline (WCML) link. This link would allow Brent to be better interconnected with the rail network, reduce time savings on travel and ease congestion at Euston. The Council is concerned without this link commuters will instead drive to Old Oak or Willesden Junction to access the station, placing further pressure on the road network and car parking provision. As the transport chapter indicates if the road network around Old Oak and Park Royal is to cope with the increased level of development it is crucial the use of public transport is facilitated.
Environment & Utilities	
QEUa	Policy should also be included on preventing and mitigating the impacts of light pollution and odour. Given the concentration of food manufacturing in Park Royal residents are concerned about the generation of smells from industry.
Table 12	The OPDC Green Infrastructure Strategy should take into account the findings of the Brent Sites of Importance for Nature Conservation study (2014), EPR.
12.3	This paragraph is at odds with policy EU1, which states the targets in table 13 are environmental standards set by the OPDC, rather than interim targets which derive from the London Plan. Given that the OPDC Local Plan must be consistent with the London Plan to be found sound, the targets in table 12 should be minimum standards.
12.30	It would be beneficial to cross-reference relevant measures identified in the Thames River Basin Management Plan 2015 to help mitigate poor water quality. Of particular relevance to the Grand Union Canal is the control and management of invasive non-native species and managing pollution from waste water.
Figure 130	It would be beneficial for figure 130 to differentiate between Floodzone 3a and 3b.
QEU3a	Brent Council supports preferred IVMS option 4. Residual attention above ground provides the greatest opportunity to contribute to wider policy objectives including ecological benefits, and opportunities for recreation and place making. This option is also the most consistent with the drainage hierarchy as set out in London Plan policy 5.13 Sustainable Drainage.
EU4	Brent Council welcomes the commitment to continuing to safeguard waste sites in Park Royal in accordance with the West London Waste Plan. Supporting text should make it clear that in addition to policy EU4, proposals for waste development must accord with the policies in the West London Waste Plan. Businesses in Park Royal experience problems recycling waste and many use

	different contractors, placing further pressure on the transport network. To support the objectives of the Local Plan and help mitigate transport impacts a project is needed to seek to establish a coordinated approach to waste management making use of local contractors and waste sites.
12.42	Any relocation deemed necessary will need to be consistent with West London Waste Plan policy WLWP 2 in addition to London Plan policy.
EU5	Alternative policy option relates to policy EU4.
EU8	<p>Ambitious targets are needed for habitat creation, in addition to survey and protection of existing sites. Much of the biodiversity referred to lies alongside railway lines. This is all at risk of removal for railway operational reasons and will be difficult to protect. Therefore the Plan needs to secure other locations within development sites for creation of new green infrastructure. Development should include green and brown roofs, green walls, planting of native trees in addition to ornamental species. Also aquatic habitat creation could be allied to surface level SUDS schemes in swales and permanent ponds. SUDS can be included at a small scale for individual buildings visibly expressed externally as part of the storm water drainage arrangements, also at a district wide level in lakes or ponds for surface water attenuation.</p> <p>It is imperative that a full tree survey is carried out of the entire OPDC area in order to give a baseline of current tree stock, condition and life expectancy. This will help shape detailed tree policy for the life of the project and should inform a numerical tree planting target. Larger longer lived species should be planted wherever possible and the right tree right place approach applied. Generous pavement width should be promoted where possible to enable tree planting along naturalistic verges. The opportunity for tree planting to be used as screening for the HS2 compound should be promoted.</p>
QEU8b	<p>Site boundaries should be amended in accordance with the Brent Sites of Importance for Nature Conservation study (2014), EPR. The study recommends boundary changes in relation to:</p> <ul style="list-style-type: none"> • Diageo Lake & Coronation Gardens BI07 • Silverlink Metro BI06A • Abbey Road Mound BI07 • Harlesden to Wembley Central BI06D <p>The study can be viewed at: www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/local-plan/development-management-policies/review-of-the-sites-of-importance-for-nature-conservation/</p>
Figure 133	<p>The figure omits Grade II Site of Importance for Nature Conservation at:</p> <ul style="list-style-type: none"> • Coronation Gardens to the south of Lakeside Drive • South of Rainsford Road, First Central Site. • West of Rainsford Road, First Central Site.
EU9	<p>Although this policy does not refer specifically to shale gas fracturing ('fracking') it is assumed this is what is referred to. The statement that it is unknown whether there is potential for this activity in the plan area of the geology is suitable is inaccurate. Brent, as in much of London, is underlain by London clay (Croydon is the exception). This is not shale gas producing geology. The British Geological Survey has investigated the shale gas prospectively in the UK and found there are no shale reserves in Brent and currently virtually all sites identified with this potential are outside London.</p> <p>Brent Council strongly objects to policy EU9 which gives encouragement to</p>

	<p>shale gas fracturing within the OPDC area. The promotion of this activity within the area is in conflict with other policies within the OPDC Local Plan and London Plan policy, as it will result in significant detrimental environmental impacts. The process of extracting gas from the ground will have a detrimental impact on air quality in an existing Air Quality Management Area. This would be contrary to proposed Local Plan policy EU10 and London Plan policy 7.14, which require development proposals to address local problems of air quality and not lead to further deterioration of existing poor air quality.</p> <p>We would anticipate impacts on local health and amenity, due to impacts on air quality and increased noise. As such, the promotion of shale gas extraction is not consistent with the promotion of Old Oak as a healthy new town, or the Local Plan objective to improve the quality of life, enhance health and well-being of communities.</p>
EU10	Key issues for the Air Quality Policy should include that although traffic is the main source of air pollution other sources will contribute such as construction activities and Non-Road Mobile machinery and local industry.
Delivery & Implementation	
Figure 138	The Council questions on what basis the Development Capacity Study has suggested development of First Central site within Park Royal would not come forward until 2022 and 2037. Initial phases of office and residential development have already been delivered on the First Central site, and the infrastructure needed to support further development is not of the scale of that needed in Old Oak. In addition it is not constrained by the delivery of Old Oak Common Station. Further development could therefore reasonably come forward in the period 2017 to 2021.
13.9	Should cross-reference Table 16 on pages 340 to 345.
13.11	Development within the OPDC area, if not supported by adequate infrastructure, would give rise to unacceptable impacts and therefore <u>would not</u> be acceptable. Text in paragraph 13.11 should be amended from 'may not' be acceptable to 'would not.'
QDIa	<p>Given that Old Oak Common Station will not be delivered until 2026, the early redevelopment of Willesden Junction Station needs considerable early improvements and investment if it is to provide a credible gateway to Old Oak and this must be a shared delivery priority for regeneration in the area. Willesden Junction Station is a critical commuter station for Brent residents and for many years to come will be the primary public transport gateway to the Old Oak regeneration area. The redevelopment of Willesden Junction will be critical to creating improved links to Harlesden. The reconfigured station should be orientated to include a more direct access on to Station Approach. This would also enable sites surrounding Willesden Junction to be brought forward for development.</p> <p>The Council welcomes acknowledgment in the Local Plan that Willesden Junction Station should be delivered as part of the first phase, however, an additional timescale is needed to identify infrastructure to be delivered in advance of Old Oak Station.</p> <p>For the reasons set out above Brent Council also strongly supports the Crossrail West Coast Mainline link.</p>
QDIc	An additional item should be included around providing infrastructure to support the operation of the canal, such as to allow for the transport of goods

	during construction and in the longer term moorings. This is consistent with the Park Royal Transport Study which comments on the potential for freight movements utilising the canal and the OAPF.
Figure 141	For clarity it would be beneficial for this figure to differentiate between existing and needed infrastructure.
Table 16	<ul style="list-style-type: none"> • The phasing should be broken down further to identify infrastructure to be delivered in advance of Old Oak Common station to support development of Old Oak North. • T4 & T5 - need to define if connection is vehicular and/or pedestrian. • T12.3 A&B - public realm and capacity enhancements should not be restricted to Scrubs Lane. Transport studies indicate impacts to the A404, particularly the junction at Harlesden Town Centre. Therefore capacity enhancements are likely to be needed beyond Harrow Road. In addition to meet the objective of ensuring regeneration benefits to the surrounding area, it is essential public realm improvements and signage help improve connectivity to Harlesden. There needs to be a degree of flexibility to allow these improvements to extend as necessary. • T12 - on figure 140 does not correlate with Scrubs Lane. • T13 – on figure 140 this item appears to relate to the Crossrail and West Coast Mainline connector, rather than public realm and capacity enhancement on Victoria Road. • T28 should also include public cycle parking facilities and be across Old Oak and Park Royal. • SS1 & SS2 - to reiterate there is no further capacity to extend schools in the vicinity in Brent. • Emergency Services - have these figures taken account of service plans of providers? Many are consolidating their operations, so it may not be possible to extend existing facilities. • In relation to Park Royal, the following items from the Park Royal transport study can't be readily identified on the list:- <ul style="list-style-type: none"> - Carriageway surface improvements in the Park Royal area (locations to be identified) - New road connections in the Park Royal area (locations to be identified) - Provision of HGV corridors within Park Royal (locations to be identified) - Provision of electric Vehicle charging infrastructure (locations to be identified)
QDIf	In addition to monitoring within the OPDC area, it will be important to

	<p>monitor the impact on the surrounding communities, in particular:</p> <ul style="list-style-type: none"> • economic impact- in terms of employment, training, the health of Harlesden Town Centre • health impacts- based on local health indicators and deprivation • housing -residents benefitting from affordable housing through nomination rights
Glossary	NPPG is an acronym for National Planning Practice Guidance rather than National Planning Policy Guidance.