



Paul Lewin, Team Leader, Planning Policy
planningstrategy@brent.gov.uk

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Dear Paul,

The Old Oak and Park Royal Development Corporation (OPDC) welcomes the opportunity to respond to the London Borough of Brent's consultation on its Regulation 19 draft Local Plan.

OPDC is generally supportive of policies and aspirations within the draft Local Plan and is keen to continue the positive joint working relationship with the council on cross boundary activities to deliver benefits for the local area and communities. OPDC has provided comments overleaf on the Local Plan and provided Statement of Common Ground which we hope will prove useful in informing the examination of Brent's Local Plan.

Should you have any queries on this response please contact us.

Yours sincerely,

Old Oak and Park Royal Development Corporation

Local Plan comments

Reference	Summary of issue(s)	OPDC comment	Suggested action
Chapter 5 - Places	Waste sites identified in the West London Waste Plan (WLWP) should be shown on the Place diagrams	To aid implementation and to provide clarity for the reader, the Place maps should show the waste sites identified and listed in the West London Waste Plan. This will help ensure this is captured as a planning consideration in the site allocations where relevant.	Amend diagrams to show locations of waste sites.
Policy BP5 South W & X	Create strong links between Harlesden Town Centre and Old Oak via Willesden Junction, and from Harlesden and Stonebridge to Park Royal, through wayfinding and public realm improvements. Enhance cycle routes from Harlesden to Old Oak.	OPDC supports the aspirations to create strong links between the OPDC area and locations in Brent. OPDC's draft Local Plan policy P11 supports creating better connections to Harlesden Town Centre to enable Brent residents to benefit from the regeneration associated with the new HS2 station. OPDC looks forward to continuing to work with the London Borough of Brent and engaging with Harlesden Neighbourhood Forum to deliver connectivity and public realm improvements.	None
Policy BH6 Housing size mix	A target of 25% of new homes as family sized (3 bedrooms or more) dwellings.	OPDC supports the family housing target and takes the same approach in its draft Local Plan.	None
BE2	Reference to the West London Waste Plan (WLWP)	It would be helpful to refer to the WLWP in the supporting text, as some sites within employment areas may be safeguarded for waste and, therefore, subject to the policies set out in the WLWP.	Provide a cross reference to the WLWP.
Policy BHC2	Policy BHC2 identifies view 17 (Abbey Road/Grand Union Canal Park Royal) which is located within the area of borough for which OPDC is the local planning authority.	OPDC supports the policy's aspiration to ensure development must not be to the detriment of views of the National Stadium Wembley; however, the justification text for the policy should recognise that BHC2 in relation to view 17 will only be implemented to determine applications within the borough where OPDC is not the local planning authority.	Amend paragraph 6.5.27 as follows: The London Plan Policy H3 Strategic and Local Views requires Local Plans to clearly identify important local views. It advises boroughs to use the principles of HC4 London View Management Framework for the management of local views. 17 views have been identified. View 17 is located within the part of the borough where OPDC is the local planning authority. BHC2 will only

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			be implemented in relation to this view for development proposals where the London Borough of Brent is Local Planning Authority.
6.8.6 and Figure 37	The text should reflect the status of the West London Orbital line project.	To refer to the fact that further work would be required to understand the location and connections of stations on the potential West London Orbital line.	Amend paragraph 6.8.6 to state that further work is required to understand the location and connections of stations on the potential West London Orbital line.
Figure 38	More extensive cycle routes are shown in OPDC's Local Plan.	Figure 38 shows cycling routes which extend into the OPDC area. To avoid duplication, the area of LB Brent within the OPDC should be removed from the map or be clearly depicted. Arrows denoted cycle routes should be depicted in the same manner as those shown within adjacent local planning authorities.	Amend Figure 38 to remove the OPDC area from the map or clearly depict the OPDC and reduce depiction of routes to locations directly. Amend paragraph 6.8.9 to state that more extensive cycling routes are proposed in the OPDC Local Plan.
BT3	Support should be given to freight consolidation	Freight consolidation is a way to minimise vehicle journeys and impact on the sub-regional road network. Therefore, it should be supported alongside the other measures referenced (use of rail, water etc).	Amend policy BT3 to refer to support for freight consolidation.
7.1.15	Health provision is a cross boundary issue and the need for ongoing joint working between OPDC and Brent should be recognised in the text.	OPDC's Infrastructure Delivery Plan has identified expansion of Park Royal Medical Practice at Central Middlesex Hospital, and expansion of the Willesden Centre for Health and Care, as necessary to support early development in the OPDC area. This has been informed by a Social Infrastructure Needs Study (SINS) prepared in cooperation with local CCGs. This should inform any needs assessment for health facilities to support growth envisioned in the Brent across the period of the emerging Local Plan. OPDC's IDP also identifies other social infrastructure projects within Brent for expansion to support development of the OPDC which should be considered, including expansion of emergency services facilities.	Amend 7.1.15 to refer to the potential expansion of healthcare provision in the Brent area to support growth in OPDC area and vice versa and the need for ongoing joint working between OPDC and Brent.

Statement of Common Ground comments		
Reference	Original text	OPDC comment and suggested action
1.8	Brent, Barnet, Ealing, Harrow and the OPDC state that they cannot meet or exceed the draft London Plan housing target. They await the outcome the Mayor's consideration of the Panel's recommendations.	OPDC does not agree that it cannot meet or exceed the draft London Plan housing target. OPDC is committed to accelerating the delivery of new homes and/or meeting to help to meet or exceed the draft London Plan housing target. Therefore, reference to OPDC should be removed from paragraph 1.8.
1.21	OPDC does not agree with the identification of the Abbey Road/Grand Union Canal Park Royal view if the expectation is that development within the OPDC area should not be to the detriment of this view.	For clarification, OPDC supports the identification of the viewing point; however, it should be noted that any development proposal within the OPDC area will be determined in accordance with OPDC's planning policy and guidance framework.
New	N/A	Health and education provision a cross boundary issue. The need for ongoing joint working between OPDC and Brent should be recognised. <u>Brent will continue to collaborate with OPDC in meeting educational and health needs through the delivery of new and/or improved social infrastructure.</u>