

# **Public Realm and Green Infrastructure Supplementary Planning Document (SPD)**

## **Consultation Statement**

**May 2024**

## 1. Introduction

- 1.1 The Consultation Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 to support the adoption of the Public Realm and Green Infrastructure Supplementary Planning Document (SPD).
- 1.2 In accordance with the Regulations, this consultation statement sets out:
  - who was consulted during the preparation of the SPD;
  - how they were consulted; and
  - each consultation comment and individual OPDC responses including how issues have been addressed in the adopted Revised SCI

## 2. Public Consultation Process

- 2.1 On 25<sup>th</sup> January 2024, OPDC's Planning Committee approved public consultation on the draft Public Realm and Green Infrastructure SPD. Public consultation took place for 6 weeks between 1<sup>st</sup> February 2024 and midnight on 14<sup>th</sup> March 2024. Consultation was run concurrently with the consultation for the Revised Statement of Community Involvement (SCI).
- 2.2 Awareness raising comprised the use of:
  - Dedicated consultation webpage ([https://consult.opdc.london.gov.uk/prgi\\_spd](https://consult.opdc.london.gov.uk/prgi_spd)) which received 201 visitors who visited the consultation platform webpage a total of 336 times
  - Public notices in local newspapers
  - Community e-newsletter and emails to stakeholders
  - Letters sent to over 18,000 addresses
  - Posters in the local area
  - Social media posts
  - 2 events (1 online and 1 in person drop in session)
  - Provision of paper copies in local destinations:
    - OPDC offices, 1st Floor, Brent Civic Centre, Wembley, HA9 0AF
    - Wembley Library, Brent Civic Centre, Wembley, HA9 0AF
    - Harlesden Library, Craven Park Road, NW10 8SE,
    - Brent Hub Community Enterprise Centre, 6 Hillside, NW10 8BN
    - The Collective, Old Oak Lane, NW1 6FF
- 2.4 Engagement events comprised an in-person drop-in event on 20<sup>th</sup> February at The Lab in Oaklands Rise and an online consultation event held on 4<sup>th</sup> March. The events were combined for both the Revised SCI and draft Public Realm and Green Infrastructure SPD. Approximately 30 people attended the drop-in event and 11 people attended the online event. The online event was recorded, and a video was posted on the consultation platform. Questions and Answers from the online event were also published on the consultation platform.
- 2.6 Comments on the SPD were able to be provided by email, post and the online engagement platform. Stakeholders were also provided with a telephone number and email address in order to ask OPDC officers and questions ahead of submitting a formal response to the public consultation.

## 3. Public Consultation Responses

- 3.1 Consultation responses to the draft SPD were received from 16 stakeholders, comprising 173 individual issues. Table 1 below sets out who raised the issue, the issue, and a response from OPDC.
- 3.2 Changes to the SPD have been made in response to 39 comments out of 173 found below in table 1. These are also set out in the SPD. The modification references are comprised of the Respondent Reference number and Comment Reference number provided in table 1 below, e.g. (3/19).

#### **4. Consultation on the SEA Screening**

- 4.1 As part of the process for developing the Public Realm and Green Infrastructure SPD, an assessment of the requirement for a Strategic Environmental Assessment (SEA) was needed. Screening consultations were undertaken to enable the Environmental Bodies as specified in section 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 to provide comment on the appropriateness of the screening process and its conclusion for this proposed SPD.
- 4.2 Those bodies are:
- Natural England;
  - Historic England; and
  - Environment Agency.
- 4.3 Other bodies were specifically invited to comment:
- London Boroughs of Brent, Ealing, and Hammersmith and Fulham; and
  - Greater London Authority.
- 4.4 The screening consultation period ran for 5 weeks from 6<sup>th</sup> February 2024 to midnight 14<sup>th</sup> March 2023.
- 4.5 Natural England responded to the SEA screening stating that the proposals will not have significant effects on sensitive sites that Natural England has a statutory duty to protect. They advised to look at the protected species and development guidance for local planning authorities (<https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications>). This was incorporated in the SPD. Natural England were invited to comment on the SPD and have made representations which are included in Table 1 below.
- 4.6 The Environment Agency also responded and welcomed continued engagement in the preparation of the document and to being consulted on the draft SPD. The Environment Agency acknowledged that the SPD is a good opportunity to provide detail on how development can contribute to the objectives and requirements of the Water Framework Directive and to ensure a Biodiversity Net Gain through the planning process. They also identified that there are also opportunities to improve habitat connectivity and create wildlife corridors across the OPDC area and the proposed SPD may outline key opportunity areas. The Environment Agency recommended consideration is given to Natural England's [Green Infrastructure Framework](#) as well as the [Green Infrastructure Planning and Design Guide](#). The Environment Agency were invited to comment on the SPD and have made representations which are included in Table 1 below.
- 4.6 OPDC's Determination Statement for the SPD (which can be viewed on OPDC's website along with the other SPD documents) confirms that the SPD will not change or introduce new planning policy over and above the Local Plan and, whilst there may be some environmental effects, these have already been considered in principle in the Integrated Impact Assessment of the Local Plan.

Table 1: Public consultation comments and OPDC responses

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
1	1	Old Oak Neighbourhood Forum	General	<p>The Old Oak Neighbourhood Forum was designated by OPDC in 2017. The Forum responded to consultations at all stages of the preparation of the OPDC Local Plan and participated in the Examination hearings held in 2019-2022. We have 150 members living or working within the designated neighbourhood boundary in East Acton, and in the surrounding parts of Ealing, Brent, North Hammersmith and North Kensington.</p> <p>This Draft SPD on Public Realm and Green Infrastructure was discussed at our monthly open meeting of Forum members on March 4th 2024.</p>	Noted
1	2	Old Oak Neighbourhood Forum	Introduction - Paragraphs 1.4 and 1.5	We submitted an initial representation on the previous consultation on the Draft Old Oak West SPD. This set out the detailed reasons why we considered that draft document could not lawfully be adopted as a SPD and would require adoption as a development plan document subject to being found sound at an Examination.	Noted

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
				In the case of this further draft SPD from OPDC, on Public Realm and Infrastructure, we consider that wording used in relation to the 'Principles' in the document have been chosen with greater care. Paragraphs 1.4 and 1.5 are clear that the SPD is guidance to encourage compliance with Local Plan and London Plan policies and does not create 'new policy'. Paragraph 1.15 uses the same form of words as in the amended Old Oak West SPD to explain the status of Principles and to make clear that these are not 'requirements' that can be applied to development control decisions.	
1	3	Old Oak Neighbourhood Forum	Introduction - Table 1: Street Family	Table 1 sets out a proposed 'Street Family' of different types of street. It would be helpful if this included an explanation of Highway Authority responsibilities for each level of 'street' (as between TfL and the Boroughs. The fact that OPDC is not the Highways Authority for the OPDC area but has many Local Plan policies on how roads and streets should be used or changed (see para 1.19 of the Draft SPD) has proved to be a source of continuing confusion for the public.	Change proposed. Paragraph 1.10 has been amended to make it clearer who the relevant highways authority is for different street types.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
1	4	Old Oak Neighbourhood Forum	Introduction - Paragraph 1.20	Wormwood scrubs: Paragraph 1.20 states The guidance in this SPD does not apply to Wormwood Scrubs. As a Metropolitan Park and Metropolitan Open Land, Wormwood Scrubs benefits from existing policies within OPDC's Local Plan. While there is little obvious logic in a SPD on Public Realm and Greening which does not apply to the largest area of open place within the OPDC area, we support the principle that the Wormwood Scrubs Charitable Trust, with input from the Friends of Wormwood Scrubs, should have primary responsibility for future plans for the Scrubs. We understand that the Biodiversity masterplan, worked up by the Trust in conjunction with LBHF and HS2, as recently been submitted to OPDC.	Noted

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
1	5	Old Oak Neighbourhood Forum	Introduction - Paragraph 1.21, Principle GIBP1	<p>Paragraph 1.21 of the Draft states The PRGI SPD does not cover anything that relates to the development of sites except for on-site public open space, on-site green infrastructure, public realm, communal and private open spaces.</p> <p>We feel that the coverage of the document needs a fuller explanation.</p> <p>For example, will householders undertaking works where planning consent is required to e.g. to their front gardens, front footpaths, cycle and bin stores and boundary walls within a conservation area (such as the Old Oak Estate) need to take account of the 29 sub-principles under Principle GIBP1: Conserving, restoring, enhancing and delivering urban greening and biodiversity?</p>	<p>Change proposed.</p> <p>The Introduction Chapter sets out how the guidance will apply. Paragraph 1.19 has been amended to provide further clarity on the application of the SPD related to development. The amendment explains how the guidance will apply to both new and existing streets, new and existing open spaces, large scale/major developments and minor developments and householder applications. The Old Oak Estate is not within the OPDC area; therefore, the SPD would not apply to this area.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
1	6	Old Oak Neighbourhood Forum	Chapter 5- Principle GIBP4	Do homeowners need to take account of Principle GIBP4: Water management through greening when revamping their front gardens and choosing surfacing? Or are such works definitely excluded from the definition of 'public realm'? If so, is this a missed opportunity to add policy guidance on means of achieving Local Plan policy EU3 in relation to domestic gardens?	Change proposed. Paragraph 1.19 has been amended to encourage best practise and overall make a positive difference to greening and water management where minor developments and householder applications come forward.
1	7	Old Oak Neighbourhood Forum	General	What about the small areas of green space integrated in the design of an area such as the Old Oak Estate?	No change proposed. The SPD applies to all proposals for new or enhancements to publicly accessible open space and public realm. Any improvements will also need to consider the Principles and Ambitions drawn out in the SPD. The Old Oak Estate is not within the OPDC area; therefore, the SPD would not apply to this area.



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1	8	Old Oak Neighbourhood Forum	Chapter 8	Where areas of public green space do not currently meet the high standards of biodiversity and 'greening' to which the SPD aspires, are landowners (including the Boroughs) expected to achieve compliance with these guidelines when drawing up contracts for grounds maintenance of these parts of the public realm? Or does this policy guidance apply only to significant new developments which include new areas where the public will have access to open spaces, landscaped areas, pedestrian/cycle routes or other parts of the 'public realm'?	No change proposed. The SPD applies to all proposals for new or enhancements where planning permission is required. OPDC will consider compliance with the SPD at pre-planning and planning stage. Local Plan Policy SP8 requires the submission of a Green Infrastructure and Open Space Strategy and Management Plan (GIOSSMP). All GIOSSMP are secured by condition which includes details on the management and upkeep of green infrastructure provision. Chapter 8 Principles provides supplementary details for considerations within any GIOSSMP.
1	9	Old Oak Neighbourhood Forum	General	The SPD is 127 pages in length, very technical in places and with much jargon (we had to look up the meaning of 'refugia'). Although the public are becoming more familiar with national and local ambitions on biodiversity, sustainability and climate change, the level of detail in this document goes beyond comparator planning documents issued by e.g., RBKC in its new Local Plan and by Ealing in its Regulation 19 Draft Local Plan.	Change proposed. We have reviewed all technical language and amended it where appropriate.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
1	10	Old Oak Neighbourhood Forum	General	Summary: Hence the need for the document to clarify its primary intended audience, and to explain to the general public the contexts and circumstances where this planning guidance needs to be read, understood, and heeded.	Change proposed. The Introduction Chapter sets out how the guidance will apply. Paragraph 1.19 has been amended to further explain the application of the SPD. The amendment explains how the guidance will apply to both new and existing streets, new and existing open spaces, large scale/ major developments and minor developments and householder applications.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
1	11	Old Oak Neighbourhood Forum	Consultation - General	As with other OPDC planning documents, we have concerns over the extent of consultation and whether residents have appreciated the implications of this SPD? Answers to the questions above, if added to the draft document, may allay many of the concerns.	No change proposed. The consultation undertaken for the SPD fully accorded with national legislative requirements and OPDC's published Statement of Community Involvement. A variety of consultation and engagement techniques were employed to ensure that community members were aware of the consultation and had a variety of means of engaging and responding to the consultation.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
1	12	Old Oak Neighbourhood Forum	Consultation - General	<p>The draft document, and details of consultation sessions, have been published on the OPDC 'consultation platform'. For the public to find their way to the relevant web page, they need to navigate via a link on the main OPDC landing page headed 'Get involved'. An alternative route of navigating via 'Planning Policy and Guidance' takes one onward to 'OPDC Planning Policy' with a link saying 'find out about all our planning documents'. Clicking on this page takes one through to a page which shows five other SPDs including the recently adopted Planning Obligations SPD. But the Draft Public Realm and Greening SPD is not mentioned on this web page.</p> <p>We made the same comments in relation to the Draft Old Oak West SPD. A web-based navigation route which starts with 'Get Involved' does not seem to be the most effective means of bringing to public attention important new sets of planning guidance. Only 4 individual members of the public responded to the Old Oak West draft SPD.</p> <p>We appreciate that OPDC circulates newsletters</p>	<p>No change proposed.</p> <p>The SPD consultation was carried out to ensure it was accessible and inclusive to enable it to be communicated to as many people as possible. This involved a multimedia outreach campaign (including emails, community newsletters, social media posts, local newspaper adverts), a dedicated page on our online engagement platform, an afternoon and early evening in-person drop-in event, an online evening event and multiple options for providing responses.</p> <p>Online information relating to the Public Realm and Green Infrastructure SPD consultation is easily available through searches via search engines with all consultation material, including event materials, available on our dedicated online engagement platform - <a href="http://consult.opdc.london.gov.uk">consult.opdc.london.gov.uk</a>. The consultation page has had 336 visits, 113 visitors have downloaded the SPD. Further information on engagement techniques is provided in the introduction to the Statement of Consultation.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
				and flyers to several thousand homes in the OPDC area. But it was disappointing that the online consultation session on this SPD attracted only a small public audience made up largely of OONF and GUA members. We were surprised that no developers and potential applicants joined this session.	

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
1	13	Old Oak Neighbourhood Forum	General	<p>Impact on financial viability of development proposals: We asked at the online session on March 4th whether OPDC has taken account of the impact on financial viability of new developments, were applicants to strive to meet all the relevant 'principles' in the SPD. We counted 267 principles in all, many of which include numerous sub-principles.</p> <p>While we were assured that the impact on viability had been taken into account in the drafting of the SPD, we will be interested to see how landowners, developers and potential applicants respond to this consultation.</p>	<p>No change proposed.</p> <p>Strategic viability work was carried out which underpinned the proposals in the Local Plan that included open space provision, the Urban Greening Factor and various other policies. Financial viability testing will also be done when sites come forward for development as they are subject to their own viability assessments. The SPD's focus is to illustrate how those policies could be delivered and provides details and examples of different ways they can be applied rather than a standard approach.</p>
1	14	Old Oak Neighbourhood Forum	General	<p>As with the Old Oak West SPD we think that this document would have benefited from an Examination at which the tests of 'soundness' would have been open for comment by all parties. OPDC would have needed to demonstrate that a suite of policy requirements on public realm and greening (as opposed to 'guidance') could be shown to be positively prepared, justified, effective, and consistent with national policy.</p> <p>We think that this would have led to prioritisation of the most important of the 246 topics covered</p>	<p>No change proposed.</p> <p>The OPDC Local Plan has been considered sound through its examination. The SPD supplements the existing policies in the Local Plan and provides guidance on how to deliver those policies in order to achieve high quality public realm and open spaces. While we appreciate the document includes significant detail in places, there are numerous factors that need to be considered in public realm design and green infrastructure provision. It is not a one size fits all approach and we therefore need to set out a variety of guidance for different typologies. We</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
				in this draft SPD, and to more realistic prospects of these being delivered. As it is we fear that many developers and applicants will focus on what are already an extensive set of 2021 Local Plan policies on greening and public realm while ignoring much of what they view as excessively detailed 'guidance'.	therefore consider the level of detail in the document to be appropriate and justified.
1	15	Old Oak Neighbourhood Forum	General	<p>Conclusion: This consultation response focuses on general concerns about the Draft SPD and its practical utility and effectiveness in providing clear guidance to applicants large and small. We do not have the technical expertise to comment on the detail of most of the 'principles'. Our basic questions are:</p> <ul style="list-style-type: none"> <li>• How will householders identify the extent to which this document applies to works which require planning consent, in respect of their own homes and gardens?</li> <li>• Will major developers pay any serious heed to 'policy guidance' which involves 267 'principles'</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>• The Introduction Chapter sets out how the guidance will apply. Paragraph 1.19 has been amended to further explain the application of the SPD.</li> <li>• OPDC will consider compliance with the SPD at pre-planning and planning stage. The SPD supplements the existing policies in the Local Plan. The SPD's focus is to illustrate how those policies could be delivered and provides details and examples of different ways they can be applied rather than a standard approach.</li> </ul>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
				and many further sub-principles be taken into account? Is it realistic to assume that such guidance will be assessed even by those developers with the technical and professional resources and capacity to undertake the work?	
2	1	Transport for London	General	Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA).	Noted



Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
2	2	Transport for London	General	<p>Thank you for giving TfL the opportunity to comment on the OPDC's draft Public Realm and Green SPD.</p> <p>The London Plan was published in March 2021. Local Plan policies and SPDs should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy. For an SPD such as this which focuses on the public realm, we would expect to see support for the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.</p> <p>We therefore welcome policies in the draft SPD which support shifting journeys to sustainable modes, we are particularly supportive of the strong emphasis on green infrastructure, active travel and diversity and inclusion. As per TfL's initial comments, the document remains quite repetitive and could benefit from some further edits to make sure that it only fills gaps in</p>	<p>No change proposed.</p> <p>OPDC's Local Plan sets out policies to deliver Healthy Streets and implement the Mayor's Transport Strategy.</p> <p>Regarding repetition, given the structure and content of the SPD addresses various typologies, minor repetition was deemed necessary in order to clearly set out the application of the principles for the relevant type of typology. As a result of the early engagement with TfL, the SPD was reviewed, and further signposts were added to simplify the content and remove repetition where possible.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				existing guidance documents which provide policy advice in relation to the public realm. In some cases, a simple signpost to relevant guidance may suffice. Alternatively, some clearer signposting at the beginning might help the user to navigate the document more easily.	
2	3	Transport for London	General	We have a number of detailed comments and suggestions for amendments on specific policies, area plans and site allocations. These are included in the table in appendix A, below.	Noted.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
2	4	Transport for London		In addition, the Mayor's Strategy on Violence Against Women and Girls (VAWG) sets out the importance of creating positive spaces in the public realm that women and girls of all backgrounds, including disabled and non-disabled, are empowered to use, as is their right, without fears for their safety. Although this Mayoral Strategy has been raised within individual elements, due to the importance of this issue, an overarching reference to this strategy is strongly recommended.	Noted. Gender inclusive design is a key element of the SPD. The SPD signposts the Mayor of London's Violence Against Women and Girls Strategy. The SPD provides guidance on public realm and green infrastructure. Within the remit of designing spaces, the SPD addresses women, girls and gender diverse safety across the document and specifically provides detail through Principle HCDP3 (Creating a safe environment), HCDP6 (Lighting) and EDIP4 (Designing and improving 24Hour safety).
2	5	Transport for London	Chapter 5 - HCDP2 & HCDP3	For these principles, it would be worth referencing public safety, i.e. striking an appropriate balance between ground floor residential privacy and some activity and overlooking for the street. Although the content on community safety is good, there could a stronger steer on activity and overlooking from non-residential ground floor units. This would be in line with the Mayor's Strategy on ending Violence Against Women and Girls (VAWG).	No change proposed. Local Plan policy D2 provides guidance for delivering safe public realm. Principles HCDP2 & HCDP3 expand on this policy and do not distinguish between residential and non-residential uses. As acknowledged, Principle HCDP2 (Approaches, frontages and boundary treatments) addresses overlooking and animated frontages to support safety.  Safety considerations for cycle parking has been addressed in Principle MIP3.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				HCDP2 Principle A i) This should include short stay cycle parking.	
2	6	Transport for London	Chapter 5- EDIP1	c) it is recommended that the Design and Access Statements include information on inclusive design for both day and night. An explicit mention of the night-time environment would be helpful.	Change proposed. Principle EDIP1 (Delivering equitable, diverse and inclusive public realm and open spaces) has been amended to include Design and Access Statements include information on inclusive design for both day and night.
2	7	Transport for London	Chapter 5- EDIP2	The outline statement should make it clear that it is required both 'day and night'.	Change proposed. Principle EDIP2 (Delivering equitable, diverse and inclusive public realm and open spaces) has been amended to outline statement to include reference to both day and night.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
2	8	Transport for London	Chapter 5- EDIP2	Missing here is any reference to the relationship between pedestrian and cycle infrastructure. It could state a preference for separate, dedicated facilities for both users, but then state the conditions under which shared use could be appropriate if there are no reasonable alternatives. Alternatively, reference could be made LTN1/20 and LCDS, either here or upfront in the document, which consider such issues.	Change proposed. Signposts amended to add reference to DfT Cycle Infrastructure Design LTN1/20 and TfL London Cycling Design Standards.
2	9	Transport for London	Chapter 5- EDIP2	On Crossings, it would be helpful to clarify that controlled crossings are generally required (signal-controlled or zebra/parallel) rather than uncontrolled or courtesy crossings (this is stated later in the document – principle SMIP1). The text in policy MIP2 (p77) could highlight the benefits and problems of different types of crossings and indicate a preference for controlled crossings. Sufficient and safe space for parking adapted bikes is needed.	No change proposed. Paragraph 6.40 explains controlled and uncontrolled crossings. Allowing for a localised approach and based on vehicular traffic, controlled crossings have been recommended for Secondary Streets. Principle MIP2 applies to all streets, therefore no preference is stated.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
2	10	Transport for London	Chapter 5- Equity Diversity and Inclusion	Pedestrian principle on safety could provide clearer definition between road safety and personal safety, in line with the definition within the GLA Guidance Women, Girls and Gender Diverse; Safety in Public Spaces. This should be considered in the context of the Mayor's VAWG Strategy.	Change proposed. Paragraph 5.116 has been amended to provide clarity on both road and personal safety.
2	11	Transport for London	Chapter 5- Equity Diversity and Inclusion	DfT requires a footway width of 2m minimum, to allow two wheelchair users to pass each other comfortably. While wide footways are mentioned, footway widths really depend on footfall. TfL's Pedestrian Comfort Guidance (PCG) could be referenced, which includes our requirement of at a least B+ pedestrian comfort level (i.e. 9-11 people per minute per metre).	No change proposed. Principle EDIP2 (Designing in and improving accessibility) states that where it is appropriate, greater width pedestrian routes of typically 3 metres will be preferred. This is to support varying speed of pedestrians and mobility aids.  TfL's Pedestrian Comfort Guidance has been signposted for Principle MIP2 (Pedestrian routes) and further mentioned in Paragraph 6.42.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
2	12	Transport for London	Chapter 5- All public realm and open spaces	<p>Surface materials colour and contrast can be useful for navigation, especially the use of tactile paving for a visually impaired pedestrian to locate a safe crossing point.</p> <p>Navigation – wayfinding should acknowledge alternative routes used at night (avoiding parks for instance) or those including other attributes such as step free.</p> <p><u>Paragraph 5.129</u> Refers to alternative routes for users uncomfortable using a certain route for safety reasons. This should be explored to address perceived safety concerns that can result in a lack of use on certain routes and therefore compound the issue.</p> <p><u>Paragraph 5.134</u> Could include reference to PCG as a valuable aid in designing comfortable crossings. Time to cross and appropriate ‘wait times’ for pedestrians are important for meeting their needs. Pedestrians will generally wait no longer than 30 seconds, but will comply to wait 40 seconds at complex junctions (TRL ‘Effective signal strategies for the safety of pedestrians’ - PPR 414).</p>	<p>No change proposed.</p> <p>Paragraph 5.129 - The SPD takes an approach on designing spaces that considers the needs and preferences of all users to improve safety.</p> <p>Paragraph 5.134 - Principle MIP2: Pedestrian Routes refers to Comfort Assessment and signposts Pedestrian Comfort Guidance for London, (2019).</p> <p>Drainage - Principle EDIP2: Designing in and improving accessibility refers to the need for minimising uneven surfaces and gaps by delivering flush covers and gratings with the footway and gullies and drainage slots positioned as far as possible from the main pedestrian flows.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				<p>Drainage could be an added as a separate paragraph, to explain types of drainage that could be used and what should be avoided, especially, for wheelchair users. While routes should be sealed, drainage needs to be efficient to prevent ponding of surface water that could then become icy in cold weather.</p>	



Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
2	13	Transport for London	Chapter 5- Para 5.220	There is reference to design and material selection for street furniture including bus stops. Bus stops are TfL's infrastructure and would need to maintain a commonality of design across our estate.	No change proposed. Paragraph 5.219 refers to street furniture proposed by developments.  Para 5.220 then provides a comprehensive list of environmental sustainability measures to achieve that.
2	14	Transport for London	Chapter 6 - Principle MIP1	Worth adding the Mayor's VAWG Strategy and GLA Guidance: Safety in Public Spaces – Women, Girls and Gender Diverse People.  Reference could be made to providing lighting and other measures to address personal security concerns particularly for evenings/night times.  Part i)- all traffic calming measures on bus routes should accord with TfL guidance.	No change proposed.  Principle HCDP6 (Lighting) and Principle EDIP4 (Designing and improving 24hour safety) signpost the Mayor's VAWG Strategy and GLA Guidance: Safety in Public Spaces – Women, Girls and Gender Diverse People.  Principle MIP1 (Inclusive, safe and accessible movement) (part I) refers to providing lighting and safety measures in line with Principle HCDP6 and Principle EDIP4.  Principle MIP4 (Public transport) part d) refers to delivering all traffic calming measures on bus routes in line with TfL guidance.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
2	15	Transport for London	Chapter 6, - Principle MIP1	It could be worth also signposting the 'Access Control guidance note' under other documents.	Change proposed. Signpost list amended to add reference to Access Control guidance note.
2	16	Transport for London	Chapter 6, - Principle MIP1	Item k) mentions raised boarding areas at bus stops. This should reference TfL Accessible Bus Stop Design Guidance and mention that 140mm is the preferred kerb height at bus stops to enable the ramp to deploy from the bus. Bus stop design would need to be in line with TfL's Accessible Bus Stop Design Guidance (2017), which should be referenced in this Public Realm document in the same way as the London Cycle Design Standards on page 79.	Change proposed. Paragraph 6.53 refers to Accessible Bus Stop Design Guidance and how bus infrastructure should be accessible. To provide more clarity, Part K has been amended to add kerb height and reference to the Accessible Bus Stop Design Guidance.
2	17	Transport for London	Chapter 6, - Principle MIP1	Note that principle MIP1 has a section on 'kerbside areas'. Generally this is good to pull out, although it might be easier not to label as a buffer and make clearer what should be in the <u>carriageway</u> (EV charge points, street tree set outs, e-scooter parking...) and what on the <u>footway</u> (space for walking, essential street furniture, pause areas and so on)	No change proposed. Chapter 6 - Introduction - Paragraph 6.6 explains street components including footways, kerbside area, carriageways.

2	18	Transport for London	Chapter 6, - Movement- pedestrians	<p>The basic ingredient for ease of movement should be prioritising pedestrians and cycling, as sustainable modes of transport together with buses. Especially, based on DfT's new Highway Code change in road user hierarchy that now prioritises pedestrians.</p> <p><u>Paragraph 6.22</u> Could include reference to PCG on footway width provided to deliver comfortable unhindered movement. It might be useful to mention that, where the footway is narrow (2-3 metres) then localised widening should be considered around bus stops. Preferably a bus stop should have a shelter, but this is hard to achieve satisfactorily where the footway is only 2 metres wide.</p> <p><u>Paragraph 6.24</u> It may be best to mention, the maximum number of steps for a flight (manageable) is 12.</p> <p><u>Paragraph 6.25</u> The radius of a kerb also affects space available as pedestrian footway. Discussion of corner radii might usefully reference the CIHT's Manual for Streets.</p> <p><u>Paragraph 6.32</u> Good visibility through the route of the underpass is essential for supporting personal safety. Particularly, during hours of darkness. The design of underpasses should also consider the 'feeling of safety' as defined within Safety in Public Spaces – Women, Girls and Gender Diverse People.</p> <p><u>Paragraph 6.36</u> Should also include the need for an Equality Impact Assessment. This is another assurance exercise, to be undertaken through</p>	<p>No change proposed.</p> <p>Paragraph 6.22: Principle MIP2 (Pedestrian Routes) refers to Pedestrian Comfort Guidance for London, (2019). Principle MIP4 (Public transport) (part d) (ii) refers to maximising space at bus stops to create suitable conditions for passengers to wait for, alight or board buses. (Part e) further addresses bus shelters.</p> <p>Paragraph 6.24: Given that this depends on the location of the site and its topography, we consider it appropriate to not be definitive for this.</p> <p>Paragraph 6.25: Principle MIP1 (Inclusive, safe and accessible movement) and Principle MIP2 (Pedestrian Routes) - signpost list refers to Manual for Streets.</p> <p>Paragraph 6.32 sufficiently covers safety of all users by addressing measures like well-lit, well-maintained and good visibility.</p> <p>Paragraph 6.36 An Equality Impact Assessment is not current a requirement in OPDC's Validation Checklist.</p> <p>Paragraph 6.38: Principle EDIP2 (Designing in and improving accessibility) supporting Paragraph 5.115 refers to the Planning for Walking Toolkit and its seven design principles.</p>
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				<p>the design process. Crucially, it ensures the design development pays due regard to designing for inclusivity as part of the Public Sector Equality Duty under the 'Equality Act 2010'.</p> <p><u>Paragraph 6.38</u> This could include the pedestrian design principles, referenced in TfL's 'Planning for Walking Toolkit'.</p>	
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Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/Figure/ Principle Ref.	Comment	OPDC Response
2	19	Transport for London	Chapter 6, - Principle MIP2	Add 'at all times of day and night' to end of main statement.	No change proposed. Chapter 1 - Introduction (Paragraph 1.16) states that where relevant, the SPD provides specific guidance to support the use of spaces during the day and night. In addition, Principle EDIP3 (Designing and improving usability and comfort) refers to supporting navigation at night.
2	20	Transport for London	Chapter 6, - Principle MIP2	e) and alternative routes where needed to address night-time safety to avoiding walking through parks and paths being step free.  Worth adding the Mayor's VAWG Strategy and GLA Guidance: Safety in Public Spaces – Women, Girls and Gender Diverse People. Alternatively, we would recommend reference to this document is made up front and is then signposted throughout the document where relevant.	No change proposed. The Mayor's VAWG Strategy and GLA Guidance: Safety in Public Spaces – Women, Girls and Gender Diverse People is already signposted at appropriate locations in the SPD.
2	21	Transport for London	Chapter 6, - Principle MIP3	As above, could we signpost TfL's Cycling Quality Criteria, the updated Strategic Cycling Analysis in TfL's Cycling action plan 2, and the Access Control guidance note, LTN1/20	Change proposed. The signpost list has been amended to add reference to TfL's Cycling Quality Criteria, Strategic Cycling Analysis in TfL's Cycling action plan 2, the Access Control guidance note and LTN1/20

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
2	22	Transport for London	Chapter 6, - Principle MIP3	There is a need to be careful about terminology – cycle lanes and cycle tracks – as they are different legally. ‘Cycle route’ is a problematic term to use because it can be understood to mean solely the branding rather than physical infrastructure and could exclude cyclable streets and spaces that don’t happen to have any particular route branding. Generally refer to LTN1/20 and LCDS for definitions (LTN1/20 needs to be in the list of signposts). It would generally be useful to clarify which, if any, of the requirements are over and above LTN1/20 and LCDS.	<p>No change proposed.</p> <p>The SPD employs similar terminologies to the OPDC Local Plan related to cycling i.e. ‘cycle lane’, ‘cycle infrastructure’ and ‘cycle route’.</p> <p>The SPD has drawn in various guidance from TfL. Some have been directly signposted whilst others have been given a localised approach to respond to OPDC constraints and opportunities.</p> <p>Signpost list amended to add reference to LTN1/20 as a response to previous comments.</p>
2	23	Transport for London	Chapter 6, - Principle MIP3	While the intent is supported, the reference to ‘different’ surface materials, road markings and colour might be misleading. Road markings need to conform with TSRGD (traffic signs regulations and general directions) and the Traffic Signs Manual. Surface materials may or may not be different from standard carriageway materials, depending on context – while legibility of space for cycling is significant, the safety and durability of the chosen material is equally if not more important and, in many cases, particularly for cycle lanes, standard asphalt surfacing may	<p>Change proposed.</p> <p>Principle MIP3 (Cycling) (part a) (iii) has been amended to add flexibility and reference to TSRGD (traffic signs regulations and general directions) and the Traffic Signs Manual.</p> <p>Signpost list has also been amended to add reference to TSRGD (traffic signs regulations and general directions) and the Traffic Signs Manual.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
				be the best choice with choice of colour being discretionary. TfL's approach is not to use colour on cycle lanes other than for safety reasons – i.e. when the presence of a cycle lane needs to be highlighted to drivers who will need to cross it.	
2	24	Transport for London	Chapter 6, - Principle MIP3	Guidance on how to accommodate cycles and pedestrians safely in the same or adjacent spaces would be useful – as a minimum, a reference to the content of LCDS and LTN1/20 on shared use.	No change proposed. Principle MIP2 (Pedestrian routes) refers to safe routes. Supporting Paragraph 6.38 acknowledges the conflict with other street users such as cyclists.
2	25	Transport for London	Chapter 6, -Para 6.48	This mentions integrating cycle parking stands with existing street furniture such as bus shelters. It's not clear how this would work in practice and TfL would not support any proposal that compromises the safety and accessibility of the passenger waiting environment at bus stops.	Change proposed. Paragraph 6.48 has been amended to remove reference to bus shelters and replaced with planters to align with TfL practice.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
2	26	Transport for London	Chapter 6, - Principle MIP4	<p>Point d) i) – This says ‘deliver all traffic calming measures on bus routes’..... It’s unclear what this means, traffic calming measures can be detrimental to bus users, so it would be useful to have this statement caveated as traffic calming measures may not always be appropriate on a bus route.</p> <p>This references a ‘minimum distance of 0.5m from the kerb’ for shelters. We would recommend this level of detail should be removed, as the scenarios and dimensions are covered in detail in TfL’s Accessible Bus Stop Design Guidance, which is mentioned in point e) i) and should be mentioned in all points that refer to bus stop or shelter proposals/design.</p>	<p>No change proposed.</p> <p>Principle MIP4 (Public transport) (part d) (i) refers to any calming measures to be in line with the TfL guidance.</p> <p>The SPD sets out the 'minimum' requirement as per TfL’s Accessible Bus Stop Design Guidance to indicate that in the OPDC scenario, this will be prioritised.</p> <p>TfL’s Accessible Bus Stop Design Guidance is listed under signposts for Principle MIP4 which indicates that the guidance needs to be considered in relation to public transport.</p>
2	27	Transport for London	Chapter 6, - Principle MIP4	<p>As well as lighting at bus stops in d(vii)) consideration should be given to what other measures might be needed to address personal security concerns particularly for evenings/night times on access routes and at waiting areas e.g. CCTV, natural surveillance, use of transparent materials, no hidden corners/ overgrown vegetation, in line with the Mayor’s VAWG strategy.</p>	<p>No change proposed.</p> <p>Consideration and measures for safety have been addressed in great detail through Principle HCDP3: Creating a safe environment, Principle HCDP6: Lighting, Principle EDIP2: Designing in and improving accessibility and Principle EDIP3: Designing and improving usability and comfort. These principles have been signposted in part d) (vii) to avoid repetition.</p>



Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
2	28	Transport for London	Chapter 6, - Principle MIP5	It might be useful to make an explicit reference to promoting delivery by cargo cycles within a development, i.e., within the off-street facilities provided on-site. At the moment, point f) iii) reads as if providing some on-footway cycle parking 'in close proximity' is enough.	No change proposed. The guidance in the SPD covers public realm and cannot suggest delivery of infrastructure within a development. On plot servicing as a preference in dealt with in the Local Plan.
2	29	Transport for London	Chapter 6, - Para 6.53	It is good to see a section on Bus infrastructure, which refers to the TfL Accessible Bus Stop Guidance and there is some reference to bus stops having adequate facilities, which is supported. However, point 6.55 states 'bus stops should be located where they do not interfere with the normal operation of other vehicles or create conflicts or hazards for drivers or pedestrians', which seems to put too much emphasis on ensuring buses are out of the way of other vehicles. We would welcome some emphasis on options for bus priority and how this could support increasing mode share for public transport and reducing mode share for private cars.	No change proposed. The following sentence in Paragraph 6.55 identifies that bus stops should be designed to allow buses to enter and exit smoothly and quickly. In addition, Paragraph 6.53 acknowledges that bus systems can provide efficient, affordable, and environmentally friendly transportation options. Principle MIP4 (Public transport) (part c) and (d) covers bus related infrastructure comprehensively.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
2	30	Transport for London	Chapter 6, - Principle MIP6	This policy seems quite balanced in addressing what you want to see at the kerbside. Loading bays are expected to include signage clearly defining restrictions but should also include something about providing such bays in easily accessible locations for the recipient business, where appropriate.	No change proposed. The signpost refers to TfL's Kerbside Loading Guidance. Locations of loading bays depends on the local circumstances of the street/site. OPDC adopts a case-by-case approach to allow for flexibility.
2	31	Transport for London	Chapter 6, - Principle MIP6	We would recommend deleting the first sentence which appears to encourage provision of on-street parking. We would suggest the following wording instead 'Development proposals should be car free or provide the minimum necessary car parking in line with Local Plan policies. If on street vehicle parking is justified, it should address the specific needs of street users without detracting from the quality of the environment.'	Change proposed. Principle MIP6 outline sentence amended as suggested to prioritise car free development in line with Local Plan policies.
2	32	Transport for London	Chapter 6, - Streets principles	It is unclear why a separate set of principles is presented for all the different street types. This has resulted in a lot of repetition that could be confusing for users of the SPD. There could therefore be some merit in consolidating advice for all street types into one set of principles.	No change proposed. The content of the SPD addresses various typologies in order to clearly set out the application of the principles for the relevant type of typology. As a result of the early engagement with TfL, the SPD was reviewed and further signposts were added to simplify the content and remove repetition where possible.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
2	33	Transport for London	Chapter 6, - Streets principles	Whilst it is understood the SPD is for the end-state, given that there will be a significant amount of construction activity underway during the lifetime of the SPD, we recommend some consideration should be given to how this may impact on the proposed function of different streets e.g. the aspiration may be for a street to have cycle lanes, but is that appropriate if the route is going to be heavily used by HGV's? Is a different design potentially needed until the bulk of the construction work has been completed? Is the role/ function of some streets likely to change during the construction phase compared to the end-state?	No change proposed. The need for interim or meanwhile or phased public realm and green infrastructure provision where streets are to be used in the interim for construction traffic can be considered on a case by case basis as there are likely to be a number of specific circumstances which impact on the preferred approach to public realm and green infrastructure delivery.
2	34	Transport for London	Chapter 6, - Figures-general	There are a number of street sections included but their purpose and status isn't explained. If they are intended to show best practice, it should be made clear that dimensions shown are only indicative and not designed to be prescriptive. Space may preclude all the elements shown and they may not be relevant for all streets. Some flexibility is required.	No change proposed. As a result of the early engagement with TfL, the SPD was reviewed to add a supporting paragraph to each street section acknowledging that the layout will need to respond to the existing context including land use designations, access roads and constraints such as existing buildings and open spaces.

2	35	Transport for London	Chapter 6, - Streets section	<ul style="list-style-type: none"> <li>• It would be useful to indicate where dimensions are recommended, maximum or minimum. For example, general traffic lanes should be no more than 3.25 metres – and only that wide when buses and other large vehicles need to use them. Other lanes can be 3.0 metres wide. Footways should be a minimum of 2.0 metres – ideally more.</li> <li>• Cycle lanes are likely to need greater width to separate from live traffic lanes on primary streets than is indicated here – an absolute minimum of 0.5 metres.</li> <li>• While having cycle lanes between the planted strip and the carriageway is one acceptable option, it would be useful to show that other configurations are also desirable, such as having the planted strip adjacent to the carriageway and a cycle track between it and the footway. This is likely to be a better layout if any parking or loading needs to be accommodated. In figures 6.15 and 6.16, for example, there would be a risk that the cycle lane is used by vehicles for parking and loading.</li> <li>• Fig 6.12 shows a bus stop bypass arrangement – however, the bus stop island, at 1.5 metres, is not wide enough. It should be a minimum of 2.5 metres for full bus accessibility, as stated in the text. Narrowing of the cycle track to the rear of the bus stop can also be a good strategy to encourage cycles to slow and not overtake through the bus stop area – so it may not be helpful to state that the cycle track</li> </ul>	<p>Change proposed.</p> <ul style="list-style-type: none"> <li>• The illustrations bring together various principles and presents what OPDC envisions our streets to look like. Where necessary, minimum and maximum dimensions and signposts have been set out across the SPD corresponding to the principles and supporting text. For example, Paragraph 6.22 addresses the recommended 2m minimum width of footway.</li> <li>• As mentioned, cycle lanes need greater width to separate from live traffic lanes on primary streets, therefore Principle MIP3 sets out the recommended minimum cycle lane width of 2 metres for one-way lanes.</li> <li>• Street sections have considered different scenarios to illustrate different principles within the SPD.</li> <li>• Figure 6.12 was erroneous and has been amended to show the 2.5m width. text has been added to 6.71 to identify the potential for narrower cycle lanes to slow cyclists down and make this arrangement safer for pedestrians.</li> <li>• The supporting text has been amended at para 6.87 next to Figure 6.23 to identify a further caveat that the design must be informed by pedestrian and cyclist comfort analysis.</li> </ul>
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				<p>should be 2.0 metres wide in this location.</p> <ul style="list-style-type: none"><li>• Fig 6.23, town centre street cross-section, shows a cycle lane between the bus stop and carriageway. This arrangement (usually known as a shared use bus boarder) needs some caveats as it raises some issues about pedestrian/cycle interaction and inclusive access. These have only been used in quieter locations and are not recommended for general use.</li></ul>	
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Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
2	36	Transport for London	Chapter 6, - Supporting inclusive, safe and accessible movement for streets that are: Primary	<p>Paragraph 6.69 Push button units are vital for safe pedestrian accessibility at pedestrian crossing facilities. Units (with a rotating cone underneath) at signal-controlled crossings are an expected feature by visually impaired pedestrians who are guided by the blister tactile tail.</p> <p>TfL's general rule is: A minimum width for signal controlled crossing of 3.2m and (DfT's) maximum of 10m. Widths of crossings are important to ensure comfort and reduce potential congestion, as pedestrians tend to deviate from crowded spaces, which can increase road safety risks for all road users not just pedestrians.</p>	<p>Change proposed.</p> <p>Para 6.69 has been amended to make push buttons a requirement at pedestrian crossing facilities.</p> <p>Principle PMIP1: Supporting inclusive, safe and accessible movement (part a) has been amended to consider DfT requirements related to inclusive and accessible movement routes.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
2	37	Transport for London	Chapter 6, - Principle PMIP1	It is acknowledged that the principle states any provision should reflect local circumstances which is supported. Although they may be the preferred option, at-grade signalised pedestrian crossings may not be feasible in all locations on the TLRN. The use of guardrails on the TLRN is a sensitive topic and best determined at a London-wide level. We would not want to see area specific guidance being developed specifically for the TLRN. There could be problems at boundary locations and potential conflict with the policy of the three local highway authorities covering the OPDC area.	No change proposed. Principle PMIP1: Supporting inclusive, safe and accessible movement (part b) provides a flexible approach to at grade signalised pedestrian crossings and acknowledges at the beginning of the principle that this will be supported where appropriate.
2	38	Transport for London	Chapter 6, -Para 6.71	Refers to bus stop bypasses. We would discourage the use of these as they are perceived as being less beneficial to bus passengers, segregating them between cyclists and traffic. These should only be considered where space is at a premium, unlike Old Oak Common where space is not as limited as it is in more built-up areas. Figure 6.13 references a bus stop bypass in West Sussex but the photo appears to be in London?	No change proposed. The SPD is not area-specific. Para 6.71 defines a bus stop by pass and provides information on what considerations should be made if deemed appropriate. It also makes reference to Department for Transport's Cycle Infrastructure Design.  Although Old Oak is brownfield it does have a number of constraints.  Change proposed Figure 6.13 caption amended to London.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
2	39	Transport for London	Chapter 6, -Fig 6.14	The image shows a large amounts of car parking which is discouraged in Local Plan policies and we would therefore recommend inclusion of an alternative image.	Change proposed. The car parking has been removed from the figure.
2	40	Transport for London	Chapter 6, - Secondary streets	<u>Paragraph 6.75</u> Pelican crossings are no longer implemented, as stand-alone crossings are now PelX to facilitate Pedestrian Countdown at Traffic Signals (PCaTS) where this is feasible	Change proposed. Para 6.75 amended to remove pelican crossings and add reference to PelX crossings.
2	41	Transport for London	Chapter 6, -Local streets	<u>Paragraph 6.81</u> Low speed limits are vital to the context of local streets to support safety perception and avoid road danger. Maintaining low speeds can be encouraged by reducing carriageway widths, to provide more space for walking and cycling. Consideration should be given to implementing lower speed limits (e.g., 20mph zones), where appropriate.	No change proposed. Setting speed limits for streets is a highways authority function so it was not considered appropriate to prescribe speed limits in this SPD.



Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/Figure/ Principle Ref.	Comment	OPDC Response
2	42	Transport for London	Chapter 6, -Fig 6.23	Shows an example of a 'Town Centre Street street-section in a mixed use area' with a 6 metre carriageway. The preferred minimum lane width for a bus is 3.2 metres on a straight alignment, so we would like the carriageway to be a minimum of 6.4 metres.	No change proposed. The carriageway can be 3m if there is no actual bus lane and buses simply share with general traffic. General traffic lanes can be 3m (even with buses). Dedicated bus lanes are recommended to be slightly wider to allow space for cyclists to pass
2	43	Transport for London	Chapter 6, -Town centre	<p><u>Paragraph 6.88</u> Pelican crossings are no longer implemented, as stand-alone crossings are now PelX to facilitate Pedestrian Countdown at Traffic Signals (PCaTS) where this is feasible.</p> <p><u>Paragraph 6.90</u> It is important to mention, centre islands need to accommodate waiting pedestrians comfortably to minimise risks of crowding as this can be problematic for some protected characteristic groups (e.g. pedestrians who are disabled, elderly, or women). Ideally, crossings should be straight across arrangements. Staggered facilities are generally not complied with by pedestrians, who prefer direct routes (Study by Urban Movement - 'Staggered crossings' March 2019).</p> <p><u>Paragraph 6.92</u> Seating in 'Pause areas' will provide great benefits for pedestrians. A reference to TfL's Streetscape Guidance could be helpful regarding types of suitable seating (ie. with backs and arm rests) and location of</p>	<p>Change proposed.</p> <p>Para 6.88 amended to remove pelican crossings and add reference to PelX crossings.</p> <p>Para 6.90 amended to acknowledge accommodating waiting pedestrians comfortably to minimise risks of crowding and consider all pedestrians including, those who are disabled, elderly, pregnant women and users with mobility aid.</p> <p>No change</p> <p>Paragraph 6.92: Paragraph 5.115 (pedestrian routes) explains how pause areas can be designed to incorporate seating among other features.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
				seating that plays a role in supporting personal safety.	
2	44	Transport for London	General	There doesn't seem to be anything to address micromobility and e-scooter parking. Whilst it is acknowledged that they can't currently be legally used outside of private land, we would recommend reference is made somewhere to explain how parking provision would be made.	No change proposed. The use of e-scooters is still emerging. You can only legally use e-scooters on private land or on the highway where there is a trial rental scheme in place. Given the emerging context for e-scooters, it is not considered appropriate for the SPD to provide guidance on appropriate parking provision for this sort of transport mode.
3	1	LB Brent	Introduction - Para. 1.15	<p>This currently reads: 'Ambitions set out more ambitious standards. They are not required in planning policy and will not be a material consideration when determining a planning application but have been provided as guidance to developers seeking to deliver best practice development.'</p> <p>We would suggest that different wording is considered. Such best practice measures are likely to be a material consideration when development proposals are assessed as a</p>	No change proposed. OPDC has used Principles and Ambitions across its SPDs to structure guidance. To ensure consistency the PRGI SPD will continue to align with definitions in other SPDs.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
				whole. For example, they might help to enhance the quality of a scheme which in certain other respects does not fully meet standards. It might be better to say “their incorporation will not be necessary to gain planning consent”. We note that para. 1.23 on page 9 states ‘The guidance in this SPD is a material consideration for the determination of planning applications’.	
3	2	LB Brent	Introduction - Para. 1.23	<p>We acknowledge the value of setting out guiding principles for developers which highlight areas they should consider while proposals are being developed prior to submission. However, we are also mindful that many of these measures will add to the cost of delivery of schemes, which in some instances may affect scheme viability.</p> <p>We welcome para 1.24 on page 9 which acknowledges that it might be more challenging to meet elements of the SPD guidance in certain circumstances, such as when proposals are responding to specific site issues and context. A few words could be added at the end of the first sentence to encompass scheme viability, for example: ‘and balancing different objectives outlined within Principles as well as other scheme delivery considerations’.</p>	<p>No change proposed.</p> <p>As part of the process for the Local Plan, strategic viability work was carried out which underpinned the proposals in the Local Plan that included Local Parks, the Urban Greening Factor and various other policies. The SPD’s focus is to illustrate how those Local Plan policies could be delivered and provides details and examples of different ways they can be applied rather than a standard approach.</p> <p>In addition, Para 1.24 acknowledges that ‘each site is different, and proposals will be judged on a case-by-case basis’.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
3	3	LB Brent	Chapter 5- Principle GIBP2	We welcome the reference within criterion c) to ensuring that tree root spread does not conflict with existing and/or proposed underground utility services. We are aware that if such conflict is not identified early on, it can result in trees having to be delivered in planters (rather than in the ground) where they are much less likely to thrive.	Noted.
3	4	LB Brent	Chapter 6- Principle MIP1	In addition to the requirement to 'provide lighting and safety measures' (point l), consideration should also be given to undertaking women's safety audits as a means of improving the safety of women and girls when walking and cycling. (This could also be considered under Principle HCDP3: Creating a safe environment and/or Principle EDIP4: Designing and improving 24hour safety).	No change proposed. Principle EDIP1 sets out requirements to ensure that all proposals should submit information on how a scheme has considered inclusive design for all protected characteristics as part of Design and Access Statement (see EDI Statement). This would consider safety of women, girls and gender diverse people.
3	5	LB Brent	Chapter 6, Principle MIP5	As well as a shift to cleaner freight (point f), the guidance should also consider the need to reduce overall freight movements through supporting and facilitating the provision, use and functioning of freight consolidation facilities.	No change proposed. OPDC Local Plan policies and Place policies supports opportunities for freight consolidation of servicing and deliveries. Such facilities will be provided within the development sites in the form of consolidation centres, which is not within the remit of this SPD.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
4	1	LB Ealing	General	<p>I am writing on behalf of the London Borough of Ealing regarding the consultation on the draft Public Realm and Green Infrastructure Supplementary Planning Document, which I understand closes on 14 March 2024.</p> <p>Ealing is supportive of much of the plan and welcomes the consideration of safety, accessibility and inclusion for all throughout the plan, alongside the creation of the best possible environment for residents. Ealing would encourage work with stakeholders and delivery partners to implement this jointly and maximise placemaking, connectivity and local investment. An exemplar for this approach will be welcome in North Acton to co-produce a masterplan for the area.</p> <p>This plan has the opportunity to complement Ealing's approach to 20-minute neighbourhoods, with locally accessible town centres that can deliver a range of facilities and services for residents. It can emphasise health prevention, addressing inequalities and delivering towards the key building blocks for health in the area. Ealing welcomes the plan's approach to encouraging local procurement that will invest in the local economy, it can build upon that to also</p>	Noted.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				create an environment to support town-centre activation, leisure uses and the night-time economy. Comments on the SPD are set out within the attached table as Appendix 1.	
4	2	LB Ealing	Fig 5.2 & Fig 6.1	Include long-term connectivity south from Park Royal to West Acton station as identified through Park Royal Connectivity Study; & include A40 subway crossings also – Allan Way & Masons Green Lane?	Change proposed. The figures have been amended to include this route and the subway crossings. The GLA's Park Royal Connectivity Study informed historic Opportunity Area Planning Framework content and has been superseded by more up-to-date OPDC evidence base.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
4	3	LB Ealing	Chapter 5 - Principle HCDP2	Emphasise activation of primary and secondary frontages with opportunities to bring life to streets and centres that become an active and participatory place	No change proposed. OPDC's Local Plan does not identify primary or secondary frontages within the Town Centres. Principle HCDP2 (Approaches, frontages and boundary treatments) and Principle HCDP4 (High quality and inclusive active destinations) emphasise the importance of animating building frontages and providing spill-out space and creating attractive and welcoming destinations and meeting points.
4	4	LB Ealing	Chapter 6 - Principle MIP1, para d)	400mm set back required from kerb edge for Ealing	No change proposed. The minimum 0.2m guidance allows for borough specific requirements such as in LB Ealing where a minimum 0.4m is required.
4	5	LB Ealing	Chapter 6 - Principle MIP1 & MIP2	Primary A40 & A406 street family treatment: approach to crossings and underpasses could be extended to give greater definition to how this will be handled on Primary Routes to provide optimal integration of all transport modes	No change proposed. Principles in Chapter 6 apply to all public realm and street family. This includes MIP1 (Inclusive, safe and accessible movement) and MIP2 (Pedestrian Routes). Paragraph 6.31- 6.33 addresses underpasses and signposts Department for Transport's Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (Underpasses). Paragraph 6.33 states how 'Underpasses for all modes (vehicles, cyclists and pedestrians) should in addition to the above, enable all users to move safely and efficiently'.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
					Similarly, crossings have been addressed within Principle MIP1 and MIP2 and supporting text Paragraph 6.40. This also includes reference to TfL Streetscape Guidance. In addition, Principle PMIP1: Supporting inclusive, safe and accessible movement applies to Primary Streets. Where necessary, principles responding to each street family have addressed specific needs.
4	6	LB Ealing	Chapter 6 - Principle MIP1, para j) ii)	Clarity on cyclist segregation from pedestrian routes and treatment alongside vehicles, 2-way cycle routes may be required	No change proposed. Detailed guidance for cycle infrastructure is set out in TfL's LTN 1/20 "Cycle Infrastructure Design" and as the SPD does not seek to duplicate the principles and specifications contained therein, the SPD signposts this guidance within the document. This also allows for providing flexibility reflecting the relevant street typologies.
4	7	LB Ealing	Chapter 6 - para 6.30	Include conflicts due to a lack of space here also	Change proposed. Paragraph 6.30 amended to include lack of space as a conflict between pedestrians, wheelchair users and cyclists.



Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/Figure/ Principle Ref.	Comment	OPDC Response
4	8	LB Ealing	Chapter 6 - Principle MIP3 / para a)	Also include speed alongside directness as many cyclists will avoid facilities that cause delay even if they improve safety	No change proposed. Principle MIP3 (Cycling) part a) (i) and (ii) details on how connectivity, comfort, safety, and directness can be achieved. This includes traffic signage and road markings which will indicate speed.
4	9	LB Ealing	Chapter 6 - Principle MIP3/ para a) v) A	Drainage slots undesirable (Slots parallel to likely travel direction unacceptable) – grids better.	No change proposed. Drainage slots comes under a type of 'linear channel drainage' and ideal in areas of heavy duty loading. Principle MIP3 refers to 'gullies and drainage slots' which covers all aspects as gully and grid are interchangeable terms.
4	10	LB Ealing	Chapter 6 - Principle MIP3 f) iv) B	Stands must be at least 800mm from kerb, whether end-on or parallel – bikes are bigger than the stands.	No change proposed. 0.5m is taken from DfT guidance. This is a minimum and if boroughs have specific higher standards these can be secured on a case by case basis.
4	11	LB Ealing	Chapter 6 - Principle MIP4	Onward travel connectivity and interchange could be extended to positively facilitate easy onward travel via multi-modal transport offer	No change proposed. Principle MIP4 (Public Transport) part b) addresses public transport infrastructure should integrate within the surrounding context which includes coordinating multi-modal transport offer such as 'other nearby public transport services, cycle facilities, junctions and wayfinding to enable onward travel.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/Figure/ Principle Ref.	Comment	OPDC Response
4	12	LB Ealing	Chapter 6 - Principle MIP5	Use of lorries with direct vision to be strongly promoted in line with TFL Direct Vision Standard and HGV Safety Permit Scheme	Change proposed. Principle MIP5: Freight, servicing and emergency access, supporting text Paragraph 6.56 has been amended to make reference to TFL Direct Vision Standard and HGV Safety Permit Scheme to support safety of vulnerable road users.
4	13	LB Ealing	Chapter 6 - Principle MIP5 f) iii)	Cycle facilities need to be sized for cargo bike use.	No change proposed. Principle MIP3 (v) sets out cycle parking to cater to different types of bicycles such as accessible bikes, adapted bikes, cargo bikes and child trailers.
4	14	LB Ealing	Chapter 6 - Principle MIP6	Allow for door-opening zone (1 metre plus) when ensuring parking spaces are clear of cycle desire lines	No change proposed. Principle MIP6: Parking and loading bays (part a) (i) refers to accommodating parking and loading facilities that do not conflict with pedestrians and cycle desire lines. The broad principle allows for a localised approach. In general, door opening zone is accounted for the width of carriageways where streets are considered suitable for cyclists. Parking at junctions are setback

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
					to ensure that it does not obstruct visibility for all users including cyclists.
4	15	LB Ealing	Chapter 6 - Fig 6.12	1.5 metres is not enough width to turn a powered wheelchair coming off a bus	Change proposed. 1.5m in Fig 6.12 is a typo that has been amended as paragraph 6.72 suggests that the width should be minimum 2.5m.
4	16	LB Ealing	Chapter 6 - Fig 6.16	2m not wide enough for loading bay adjacent to cycle track – vans are up to 2.5 metres wide, and doors open at least a metre wide, same would apply to car charging points	Change proposed. The DfT standard is for loading bays to be a minimum 1.8m but the standard also says this should be set back a further 0.5m from a cycle lane and so a minimum 2.5m is appropriate. Figure 6.16 has been amended.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/Figure/ Principle Ref.	Comment	OPDC Response
4	17	LB Ealing	Chapter 6 - Principle LMIP2	On quieter roads, which cyclists share with motor traffic there should be a strict 20mph speed limit	No change proposed. It is not within the scope of the SPD to set speed limits. This would be defined by the local highways authority.
4	18	LB Ealing	Chapter 6 - Page 93	Loading needs to be possible without blocking any cycle lane	No change proposed. Principle TMIP3 (Freight, servicing and emergency access) requires Transport Assessments and Travel Plans to allow for a localised approach. This will address any loading and cycle lane conflicts considered on a case-by-case basis. Principle TMIP3 also supports restricting freight and servicing activities to early mornings and late evenings to minimise conflicts with street users.
4	19	LB Ealing	Chapter 6 - Principle TMIP1	Cycle parking needs to be provided at frequent intervals in town centres – max 25 metres from any business premises. Same for local centre streets (page 98).	No change. Principle MIP3 (Cycling) applies to all streets and (part f) signposts TfL's London Cycle Design Standards (Chapter 8) which sets out the cycle parking space requirements in destinations.
4	20	LB Ealing	Introduction - Open space: Opportunities	Emphasise importance of connected smaller parks and public space as a network of green links and open spaces  Maximise routes to large high quality green spaces i.e. Wormwood Scrubs and Canal route to Ealing Regional Park	No change proposed. Opportunities within OPDC for open spaces acknowledges 'improved connections and routes'.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
4	21	LB Ealing	Chapter 5- Principle EDIP1 & 2	Maximise publicly accessible open spaces through future developments and forthcoming planning applications – set as a requirement for any courtyard developments and mixed use that permeability is paramount to placemaking for the forthcoming Old Oak West masterplan area	No change proposed. OPDC's Local Plan Policy EU1 (Open Space) requires 30% publicly accessible open space for non-SIL development. Old Oak West SPD provides guidance for permeability including to open spaces. This SPD, specifically Principle MIP2 (Pedestrian Routes), further sets out OPDC wide guidance on permeability.
4	22	LB Ealing	Chapter 5 - Principle HCDP6, Principle OSHCDP 1 & Principle LOSGIBP 1	Ealing's Council policy is not to introduce any further street lighting in parks Include a statement as to suitability of lighting in specific areas with consideration of context, users and biodiversity impacts	No change proposed. The guidance in this SPD has a balanced approach related to EDI and safety considerations that enable the use of open spaces during the day and night. The SPD provides guidance to support the use of open spaces, ensure their safety including for women, girls and gender diverse people, and mitigating impacts on wildlife. In particular, Principle HCDP6 applies to all public realm and open spaces. Principle HCDP6 (Lighting) sets out approach to lighting considering the space, content, and light levels. Part b) sets out considerations to taken for Lighting Strategies. Part b) (iv) requires proposals to accord with Principle GIBP1 (Conserving, restoring, enhancing and delivering urban greening and biodiversity and Principle GIBP2 (Delivering resilience and high quality greening) to avoid impacting wildlife and habitats.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
4	23	LB Ealing	Chapter 5- Principle GIBP1	Biodiversity NetGain (BNG) – The OPDC Biodiversity and Urban Greening Strategy references 10% BNG – Ealing is moving towards 20% as part of the Local Plan. Will developments within the OPDC in Ealing be subject to 10% or 20%? Is there an ability to increase to 20%	No change proposed. Developments within the OPDC boundary are subject to OPDC Local Plan policies. The Local Plan sets out a positive biodiversity net gain approach with a minimum requirement of the advised national regulations.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
5	1	Imperial College	General	<p>On behalf of Imperial College London on behalf of our client, Imperial College London ('Imperial'), we are writing in response to your recent invitation for comments on OPDC's Draft Public Realm and Green Infrastructure Supplementary Planning Document ('SPD').</p> <p>Imperial acknowledge that the SPD will form part of the guidance that supports the OPDC Local Plan (2022) and welcome the opportunity to engage with the council in producing a planning document that provides detailed guidance on Local Planning policies that relate to Public Realm and Green Infrastructure across the whole of the OPDC area.</p> <p>This draft SPD is of great interest to Imperial given their landholdings in North Acton including 140 Wales Farm Road, Woodward Halls and 1 Portal Way which are located in the southern area of the OPDC. 1 Portal Way received a resolution to grant permission for a major hybrid application comprising residential, student accommodation and associated employment development (21/0181/OUTOPDC) in October</p>	Noted

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				<p>2023 and will act as a major catalyst for regeneration in the wider area. This application also sought the provision of publicly accessible landscaped open space, associated highway works and public realm improvements meaning that Imperial have extensive experience developing and managing property which provides public realm and green infrastructure in the area. Imperial therefore can offer constructive, well informed feedback on this SPD.</p>	



Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
5	2	Imperial College	General	<p>In summary, our client supports many of the principles and aims outlined in the draft SPD, particularly the intention to “undertake a comprehensive approach to protecting, improving, delivering and connecting the natural environment” and commitment to “deliver an urban environment that offers a high-quality public realm and green infrastructure”. The graphics included on page 38 are also considered a very useful way of summarising and communicating the principles. The general approach of the SPD is also supported with Principles and Ambitions generally supporting development in the OPDC rather than being a barrier to it. This being said, there are a number of instances where the SPD is found to be overly prescriptive and unrealistic which may negatively affect development coming forward.</p> <p>In response to this, comments focus on: overly prescriptive policies relating to planting, tree canopies and building frontages, requirements for lighting strategies, sustainability targets and general thoughts on the language, length and formatting of the SPD.</p>	Noted

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
				Further details pertaining to Imperial's views on the SPD and information on where we are seeking amendments to, or further clarification on the guidance documents, is noted in section B below.	

5	3	Imperial College	General	<p><b>a. Imperial College London &amp; OPDC</b></p> <p>Imperial is regularly ranked amongst the top ten best universities in the world, has an international reputation for excellence in teaching and research, and is the only university in the UK to focus exclusively on science, engineering, medicine and business. Imperial is a committed, long-term local stakeholder in the West London region, founded in 1907 in South Kensington. Today, the University in its entirety is home to around 23,000 students and 8,000 staff with an international community attracting undergraduates from more than 125 countries. Imperial's mission is to tackle the world's biggest challenges through industry including climate change, future energy supplies, antibiotic resistance, and national security. Imperial has the greatest concentration of high impact research of any major UK university and was recently named by the QS World University Rankings 2024 as 6th in the world. Imperial was also named by the Guardian University Guide 2024 as 1st for graduate prospects, as their world-leading research and educational environment provides highly skilled graduates and lifelong learning opportunities for the UK labour force. Imperial is a significant stakeholder within the OPDC area, as a major landowner, operator and landlord of homes and workspaces in North Acton and West London as a whole. North</p>	Noted
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			<p>Acton is home to two of Imperial's newest halls of residence, the Kemp Porter and Woodward Buildings, which opened in 2020 and 2014 respectively. Together, they are home to approximately 1,200 first year undergraduates, and have given rise to a thriving student community in the local area. Imperial own and manage Clayworks residential apartments in North Acton, which includes key worker accommodation. Imperial is also a proud sponsor of the Park Royal Design District which made its debut at the 2021 London Design Festival.</p> <p>Significantly, Imperial own 1 Portal Way in North Acton, which received a resolution to grant permission in October 2023 from OPDC's planning committee for their major hybrid application for a major mixed use multi-phase scheme (Planning Ref. 21/0181/OUTOPDC). The scheme will provide a range of residential typologies including, co-working and student accommodation as well as flexible workspaces (21/0181/OUTOPDC) and was developed in conjunction with OPDC's planning team.</p> <p>Imperial are supportive of Old Oak and Park Royal as the single largest development opportunity in London. Imperial are developing a vision for innovation growth that draws from activities across multiple boroughs in West London, that builds a strong and meaningful ecosystem of research; start-ups, scale ups and corporates. Through the White City Innovation</p>	
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			<p>District and facilities at Hammersmith Hospital, Imperial are the early adopters of this vision, whilst also playing an active role in bringing forward sustainable development in and around North Acton.</p> <p>The White City Hammersmith Campus is a significant eco-system for science and innovation in London with many occupiers now seeking additional space to expand their operations as their firms scale. Science and innovation scaling firms require appropriate development space within proximity of their current research facilities.</p> <p>Imperial are owners, developers, and operators of affordable workspace including the Incubator at White City, providing office and laboratory space for early-stage companies. Imperial's experience to date has been shared with OPDC through previous consultations and has supported our comments in this representation. This letter sets out Imperial's thoughts in respect of a number of the draft principles and aims published within this SPD, as well as identifying matters which are not addressed at this stage for consideration in subsequent draft documents.</p>	
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Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
5	4	Imperial College	General	<p><b>b. Representations</b></p> <p>As already stated, Imperial are supportive of many of the principles outlined within the Draft Public Realm and Green Infrastructure Supplementary Planning Document but would like to make representations directly responding to several SPD Principles. This section provides representations that directly responds to the questions set out in relation to the relevant principles/ambitions within the Draft Public Realm and Green Infrastructure SPD consultation survey. These questions are in bold, and italics, with our response following.</p>	Noted

5	5	Imperial College	<p>Chapter 5 - Principle GIBP1 and Ambition GIBA1</p> <p>Imperial agrees with the OPDC's intention to "inform the design of new buildings and public realm improvements in Old Oak and Park Royal to enhance, protect and maximise opportunities to create a living natural network" and consider that the Principles and Ambitions are generally successful in setting out the principles for landscape design. Despite this however, there are a number of points within Principle GIBP1 and Ambition GIBA1 that Imperial seek to amend.</p> <p>Principle GIBP1 sets out guidance on conserving, restoring, enhancing and delivering urban greening and biodiversity in OPDC. Whilst the majority of the Principle enables flexibility on how to achieve this e.g. Part R - "all development proposals should, where possible, provide greening that acts as a noise and safety buffer between vehicles and pedestrians" or recites adopted requirements from the London Plan e.g. Part O - "all development proposals should deliver at least the relevant Urban Greening Factor of 0.3 for commercial-led, 0.4 for residential led developments", Part S does not and as a result acts against the intentions of the Principle.</p> <p>Part S, point iii) requires all developments to "include planting that is at least 50% - 70% native". This is far more prescriptive than any other requirement / suggestion within the</p>	<p>No change proposed.</p> <p>Principle GIBP1 (Part S)(iii): The range for native species was informed by specialist advice to help local nature recovery and contribute towards valuable habitat creation while adapting to climate change.</p> <p>Principle GIBA1: Paragraph 1.15 defines Ambitions. They are a more ambitious standards and will not be a material consideration when determining a planning application. They have been provided as guidance to developers seeking to deliver best practice development.</p> <p>The range of guidance in the SPD enables a flexible approach while also securing the habitat creation.</p>
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			<p>principle and therefore appears out of place.</p> <p>The same can be said of Ambition GIBA1 (Optimising urban greening and biodiversity) Point a) which aims for at least 20% of the future tree canopy cover percentage to be above vegetation at ground level. Imperial considers that the inclusion of a blanket requirement for planting types and tree coverage is too specific and may stifle innovative design therefore risking the homogenisation of green infrastructure in OPDC. Imperial suggest re-focussing on the use of pollinator friendly species and a range of plants to improve biosecurity and that tree variety and coverage density should be judged on a site-by-site basis to ensure that a variety of different landscapes and public realm is delivered.</p>	
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Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
5	6	Imperial College	Chapter 5 - Principle GIBP2 Point J)	Finally, Principle GIBP2 Point J) which concerns delivering resilience and high quality greening states that all development proposals should support resilience by “ensuring trees that die within 5 years are replaced at equal size having considered if alternative species is appropriate”. The inclusion of this requirement is not considered appropriate in an SPD and Imperial see it to be better suited as a condition on a planning permission.	No change proposed. It is considered appropriate to provide this guidance as the SPD frames what OPDC seeks to secure via condition or through S106 agreement.
5	7	Imperial College	Chapter 5 - Heritage, character and design: General	Imperial agrees with the broad aims of the Heritage, character and design chapter and considers that it offers a good level of guidance to deliver high-quality, inclusive, accessible, coordinated and multifunctional public spaces. Imperial also considers that the requirements for creating safe and active environments are generally fair and that the guidance relating to the choice of materials (Principle HCDP5) is realistic and applicable to a range of building uses and typologies.	Noted
5	8	Imperial College	Chapter 5 - Principle HCDP2	Principle HCDP2 concerns approaches, frontages and boundary treatments and aims to enhance the relationship between the public realm, open spaces and adjacent buildings or structures. Whilst Imperial support the broad	No change proposed. The SPD provides guidance for determining applications on a case by case basis. What is considered sufficient as a set back will be informed by

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
				<p>intentions of this Principle, Part a) states that all development proposals should support the function and character and create a strong sense of place by “providing a sufficient setback width from the boundary line to the kerb line to define strong relationships between ground floor uses and the public realm. This should accommodate i) areas for spill out uses”. Similarly to the response to Principle GIBP1, Imperial consider that this blanket requirement is too prescriptive and may deter certain developments from coming forward.</p> <p>Imperial consider that each site should be judged independently on its ability to facilitate a “sufficient setback” as for some, the loss of developable area may affect viability and their ability to bring the site forward. This especially will be the case after April 2024 with the loss of space to Biodiversity Net Gain requirements further limiting a site’s developable area. Further clarification is needed from the OPDC on whether developments that are flush to the boundary line and therefore unable to provide a “sufficient setback” will be supported.</p>	the specific site constraints and ability to deliver the guidance set out in the SPD.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/Figure/ Principle Ref.	Comment	OPDC Response
5	9	Imperial College	Chapter 5 - Principle HCDP6	With regards to Principle HCDP6 (Lighting), the SPD requires that lighting Strategies are considered early in the design process and included in pre-application discussions to enable wider coordinated placemaking opportunities. Whilst supportive of this, Imperial request OPDC to ensure that officers are available with enough capacity to attend preapplication meetings and deliver feedback on a regular basis. This is to avoid logjams of applicants waiting for preapplication responses which will stall development progress.	Noted. OPDC's DM team is sufficiently resourced to deal with such caseload.
5	10	Imperial College	Chapter 5 - Principle ESP1	Principle ESP1: Achieving Environmental Sustainability seeks to ensure materials used in the creation of the public realm are sustainable. Whilst supportive of these intentions. Imperial has concerns over the impact of Point B and Point C of this Principle on the delivery of development in OPDC. Point B) states that all development proposals should minimise environmental impacts by "promoting the local supply chain, employing local people, prioritising suppliers within the local area where possible and at a minimum, Greater London". Imperial agrees with the broad intentions of the policy but, judging from the experience of the 1 Portal	No change proposed. Principle ESP1(B) is considered to be a key component in achieving environmental sustainability and is worded to be sufficiently flexible to accommodate local circumstances. The principle would be applied pragmatically but it is considered important to have a clear starting point principle that local supply chains and employment opportunities are supported where feasible.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
				Way scheme, encourage the council to recognise that employing local people for specific, high skilled jobs, is not always possible and that the local supply chain cannot always provide what is required. This is particularly the case given the quantum of proposed development locally and the nature of high rise development.	
5	11	Imperial College	Chapter 5 - Principle ESP2	The policy also states that proposals should use materials that comprise at least 20% recyclable material and use 100% timber that is FSC (Forest Stewardship Council) certified. For the same reasons as our response to the requirement for developers to prioritise the local supply chain, the ability to comply with this Principle is dependent on the availability and cost of the resource at the time of construction.	No change proposed. Principle ESP1(B) is a repeat of planning policy in OPDC's Local Plan.
5	12	Imperial College	Chapter 6 - Table 5 (OPDC Street Family reference matrix) and Table 6	The Public Realm Chapter sets out a hierarchy of movement routes which consider transport and place-based elements. Whilst the intention to provide guidance relating to specific Street Family typologies is appreciated, Table 5 (OPDC Street Family reference matrix) and Table 6 (OPDC Open Space reference matrix) are considered to be of limited value due to the similarity of data within them. Almost every	No change proposed. The tables are considered to be useful reference material to help navigate the overlapping elements of guidance set out in the SPD.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
			(OPDC Open Space reference matrix)	street typology has the same principles as being applicable meaning that (according to the table) there is little variation between them. Imperial suggest including a table which only shows policies that are specific to a certain typology to avoid date being repeated.	
5	13	Imperial College	General	<b>Other Comments</b> There are a number of comments on the SPD Imperial intend to make which do not relate to a specific question. These pertain to questions that should be asked during this consultation, the relevance of case studies provided and the general language, formatting and length of the SPD.	Noted
5	14	Imperial College	Spatial Vision	Whilst broadly in agreement with its intentions, there are no questions within the consultation pack that allow the opportunity for consultees to provide feedback or suggested improvements to the Spatial Vision. Imperial would like to use this opportunity to agree with the Spatial Vision, particularly the aim to provide equitable access which celebrates diversity and inclusivity to ensure that the public realm and open spaces	Noted

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				meet the needs of all residents, employees and visitors.	

5	15	Imperial College	Case study	<p>Imperial would also like to comment on the relevance of the case studies used. Case studies are important as they gives consultees a realistic idea as to what types of development to expect from the SPD. Whilst there are a number of case studies used within the document, there are very few which are taken from projects in west London. An example is provided on page 68 (Figure 5.46) which shows the Portobello Pavilion in Kensington and Chelsea. Whilst this is a long way from the site, it is still an example of a West London public realm improvement scheme. The remaining examples are all outside West London e.g. Figure 5.47 shows Brixton Market, Figure 5.44 shows Bowes Park Primary School in Enfield and Figure 5.28 shows the Queen Elizabeth Olympic Park in Stratford. Imperial consider that more examples should be taken from local developments which have successfully delivered public realm / Green Infrastructure in the area. This would give applicants a clearer idea of what to aim for and what is achievable on their sites.</p> <p>OPDC could also provide examples of existing public realm or green infrastructure projects in the local area that could benefit from improvements. This could include local parks / open spaces such as Wormwood Scrubs which is of great importance to the local and wider community for recreational activities. The improvement of linkages to assets such as</p>	<p>No change proposed.</p> <p>The SPD is not location specific and provides wider spatial guidance. It is therefore not appropriate for the SPD to highlight local public realm projects which require improvement.</p> <p>Local Plan provides policies to enable new and enhanced connections to publicly accessible open spaces. An example includes Policy SP7(e) which supports new and enhanced pedestrian and cycle connections to Wormwood Scrubs.</p>
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			<p>Wormwood Scrubs should therefore be seen as a focus for this SPD.</p> <p>To achieve this, the Public Realm and Green Infrastructure SPD should focus on the same “potential new walking and cycling routes” that feature in Figure 5.5 of the recently adopted Old Oak West SPD and explore new ways to improve these connections. Policy 12 Section G of the adopted Local Plan (2022) states that there is a commitment to “improving access to Wormwood Scrubs for all Londoners by ensuring development contributed to new and improved sensitive walking and cycling access points”. To fully comply with and support adopted policy, Imperial consider that OPDC should include a section in this SPD which outlines intentions to improve connections to local parks and open spaces such as Wormwood Scrubs.</p>	
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Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
5	16	Imperial College	General	Finally, Imperial would like to comment on the general language, length and formatting of the SPD. Imperial consider that the document provides informative, detailed guidance on local plan policies but that the length, formatting and language of the document, the policies in particular, makes it difficult to read and interpret. There are many instances where the policy aims and objectives are repeated meaning that they lack clarity and “punch” making them more difficult for applicants to interpret and remember to embed into their proposals.	No change proposed. Given the structure and content of the SPD addresses various typologies, minor repetition was deemed necessary in order to clearly set out the application of the principles for the relevant type of typology. The use of visuals brings together components of the principles and help illustrate the guidance.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
5	17	Imperial College	General	<p>Additionally, Principles often seem to reiterate the Adopted OPDC Local Plan 2022 rather than providing clarity on the policy to which it relates. For instance, Policy EU2 of the adopted Local Plan 2022 states that development proposals will be supported where the “measurably conserve and enhance Sites of Importance for Nature Conservation (SINC) and other identified priority habitats or species”. However, SPD Principle GIBP1 states that “development proposals should conserve sites that are adjacent to Local Nature Reserves, Local Wildlife Sites or Sites of Importance (SINCs) by undertaking due care to avoid impacts on these sites” and that proposals should “enhance sites that support improvement, in condition or distinctiveness of existing Local Nature Reserves, Local Wildlife Sites, and SINCs”.</p> <p>Whilst imperial are not advocating for a more prescriptive approach, there are several examples similar to the above where the SPD doesn’t provide any supplementary information to articulate how the Local Plan policies should be achieved. Imperial suggest that a clearer distinction be made between the two documents</p>	<p>No change proposed.</p> <p>In some cases, there was a need to repeat limited elements of the Local Plan to support the usability of the SPD. Supporting Paragraph 5.7 provides some measures on how enhancement could be achieved.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				and that the SPD remove text that simply reiterates existing policy. The SPD will be of greater value to applicants if it is seen as a document which supports and clarifies existing policy rather than merely repeating it.	

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
5	18	Imperial College	General	Imperial also consider that the level of detail should be reviewed across the SPD and measured against the purpose/ function of the document. In places it is too prescriptive for an SPD with Principles, such as Principle OS-HCDP1 d) and LOS-GIBP1 c) both stating that developments should “undertake topographical analysis of the context to “ensure” key views to open spaces are maintained” or “ensure rain gardens and swales are provided”. The frequent use of the word “ensure” is considered too strong for an SPD, especially in the case of Principle OS-HCDP1 where the Principle’s wording goes beyond the Local Plan which focusses more on “key views” (Policy D6) as identified in the views study which forms part of the Evidence Base.	<p>Change proposed. Principle OS-HCDP1 (part d) amended to set out that the topographical analysis is required in order to appropriately assess the impacts on key views.</p> <p>No change proposed. Principle LOS-GIBP1 (part c) refers to provision of rain gardens and swales to avoid any adverse impact on the biodiversity of waterways. Local Plan Policy P3 (Grand Union Canal) (part I) requires enhancing the water quality of the Canal. Principle LOS-GIBP1 (part c) supplements this policy.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
6	1	Canal and River Trust		<p>Thank you for your consultation on the above document.</p> <p>We are the charity who look after and bring to life 2000 miles of canals &amp; rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal &amp; River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.</p> <p>As you are aware, waterways are acknowledged as significant green infrastructure, but they also function as blue infrastructure, serving as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural</p>	Noted.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
				health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of its area.	
6	2	Canal and River Trust		The draft document is thorough and well considered, with good references to the Grand Union Canal and the Canal Placemaking Strategy. We are pleased to note that amendments have been made to take on board the Trust's earlier comments, and have the following further comments to make:	Noted.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
6	3	Canal and River Trust		<p>Page 23 5. All Public Realm and Open Spaces Biodiversity Net Gain</p> <p>The Canal &amp; River Trust's 2000 mile network of canals and navigable rivers, docs and reservoirs forms the UK's longest linear green and blue space. It is a home to protected species and everyday wildlife and plants. As well as an important space for nature in its own right, it links isolated habitats, giving wildlife room to flourish, and provides nearly 9 million people with access and connectedness to nature on their doorstep.</p> <p>The Trust may be able to assist developers in meeting BNG requirements by providing off-site biodiversity units. This would be subject to operational, management and commercial considerations. Developers wishing to discuss opportunities to secure biodiversity units on Trust land should contact <a href="mailto:bngenquiries@canalrivertrust.org.uk">bngenquiries@canalrivertrust.org.uk</a>.</p>	Noted.

6	4	Canal and River Trust	<p>The impact of development on the biodiversity of the Trust's network has long been a matter for consideration in the exercise of our statutory consultee function. How a development impacts upon habitats on the Trust's land and how these impacts are mitigated through Biodiversity Net Gain (BNG) is, therefore, a planning matter for the Trust in our role as a statutory consultee.</p> <p>It is anticipated that BNG will be implemented in accordance with all relevant legislation and recently published guidance including the following points which are of particular relevance to the Trust:</p> <ul style="list-style-type: none"> <li>- Planning applications that include land within 10m of a watercourse (including our canal network) will need to be accompanied by an assessment of the baseline condition of the watercourse and deliver a 10% net gain in watercourse biodiversity units.</li> <li>- Planning applications that include Trust land within the red line development site boundary will need to consider the habitat condition of that land within the BNG baseline and account for it in delivering a 10% net gain.</li> </ul> <p>The Biodiversity Metric supports off-site compensation and enhancement measures being undertaken close to the development site. The Trust considers that where there is an adverse impact on the biodiversity of its waterways, the strong presumption should be</p>	Noted. The Canal and River Trust would be consulted on relevant planning applications.
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			<p>that the impact is compensated for on its waterways.</p> <p>We would ask that where a local planning authority is aware of a proposal to undertake development within the Trust's statutory consultee notified area (especially when it is within 10m of our waterway) the developer is encouraged to undertake pre-application discussions with the Trust to ensure that appropriate BNG requirements and opportunities are discussed. Details on our pre-application advice can be found on our website here: <a href="https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/what-were-interested-in/pre-application-advice">https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/what-were-interested-in/pre-application-advice</a></p>	
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Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
6	5	Canal and River Trust		Applicants should also be reminded of the need to obtain the Trust's permission as landowner prior to undertaking any walkovers or surveys of our waterways or land in our ownership.	No change proposed. This requirement is outlined in OPDC's Local Plan.
6	6	Canal and River Trust		The Trust will, in its capacity as a statutory consultee, endeavour to advise local authorities on the biodiversity implications of proposed developments, including the extent to which Biodiversity Net Gain proposals will or will not compensate for the impact on the development on the Trust's network.	Noted.
6	7	Canal and River Trust		In circumstances where BNG would not deliver mitigation and/or enhancement on Trust land but legal and policy requirements would be met by the developer elsewhere, we may still seek biodiversity mitigation/enhancement measures on Trust land through the planning process where this is supported by appropriate evidence (for example in relation to the protection of specific species), planning policy and case law.	Noted.
6	8	Canal and River Trust		The Trust is keen to work with local authorities to identify and deliver opportunities for habitat enhancement on our waterways to meet local and national aspirations for access to green/blue space, habitat quality and connectivity. We therefore welcome this consultation and would	Noted.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
				ask that you continue to engage with the Trust on the formation and implementation of future guidance, policies and proposals on these matters.	
6	9	Canal and River Trust		Page 41 Principle HCDP6: Lighting We would welcome some specific reference to the canal environment in the policy, to avoid any presumption that the canal should be lit, as a key pedestrian and cycling route. We note that the canal is briefly covered in the supporting text on page 42, but would suggest this could be referenced further.	No change proposed. The current wording is considered to sufficiently recognise the sensitivity of the canal and potential for lighting to cause adverse impact and not be appropriate in these locations. Principle HCDP6 iv) identifies the need for proposals to avoid adverse impacts on wildlife and habitats and supporting text at paragraph 5.92 explicitly references the canal as an area of ecological sensitivity in relation to this.
6	10	Canal and River Trust		Page 75 - Water features Paragraph 5.171 states "Water features can contribute significantly to mental wellbeing. OPDC's Canal Placemaking Strategy identifies the Grand Union Canal as an asset for leisure and wellbeing. Any improvements should consider regular maintenance, cleanliness and adequate security measures that will contribute to creating a safe and enjoyable recreational environment along the canal side."	Change proposed. Paragraph 5.171 amended to suggested wording regarding boaters.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				As stated, these interventions may be appropriate and bring benefit as long as there is good natural surveillance and maintenance of seating areas and equipment, to avoid accumulation of litter and graffiti. There are limited references to boaters within the SPD and we would welcome the following highlighted addition in this paragraph: Events and canalside activity should consider canalside neighbours, <u>including boaters who live on the canal (at permanent or visitor moorings)</u> , and any impact on wildlife, including nocturnal wildlife.	
6	11	Canal and River Trust		Page 82 Overshadowing Paragraph 5.190 states A consideration of the sensitivity to overshadowing of adjacent Sites of Importance for Nature Conservation (SINCs) and priority habitats to the east, south, and west of any developments should be provided in any Preliminary Ecological Appraisal or Ecological Impact Assessment submitted with a planning application for such development." The Grand Union Canal should be considered a sensitive receptor for microclimate impacts such as overshadowing.	Noted. The Grand Union Canal is identified as a Site of Importance for Nature Conservation.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
6	12	Canal and River Trust		<p>Page 84 Wind mitigation #</p> <p>We would like to add a reference to navigation here: <u>"Tall buildings close to waterways can cause adverse wind impacts on the towpath or waterspace, which can affect navigation of boats (which have a shallow draft in the water), and developments should avoid creating a canyoning effect near waterbodies."</u></p>	<p>No change proposed.</p> <p>The section on page 84 deals with primary streets so it is not considered appropriate to provide guidance for wind impacts on the towpath or Grand Union Canal here. In any case, the SPD focusses on guidance for the public realm rather than in respect of impacts of tall buildings and mitigating impacts. These impacts are dealt with through policies in the London Plan and Local Plan, specifically Policy D9 and OPDC Local Plan Policies P3, D4 and D5.</p>
6	13	Canal and River Trust		<p>Page 105 - Principle OS-MIP1: Supporting inclusive, safe and accessible movement</p> <p>We note the amendment at point d) iii) to include "where possible, a minimum width of 3 metres"</p> <p>We would suggest that this could be clarified to include "where possible, a minimum width of 3 metres, <u>or a suitable alternative which provides sufficient space for pedestrians and cyclists to move safely.</u></p> <p>The supporting text could also include the following sentence <u>"The Grand Union Canal towpath is unlikely to be able to consistently achieve a 3m width due to a number of other</u></p>	<p>Change proposed.</p> <p>The suggested wording has been added to Principle OS-MIP1 and its supporting text to support suitable alternative which provides sufficient space for pedestrians and cyclists to move safely.</p> <p>Paragraph 7.25 has been amended to identify sufficient towpath width for both pedestrian and cyclist safety. The amendment also identifies the towpath's constraints and accommodation of operational functions.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
				<u>constraints and operational functions that also need to be accommodated"</u>	
6	14	Canal and River Trust		Page 114 Linear Open Space This section could include a requirement for canalside developments to improve access to the canal and improve walking and cycling along the canal where needed.	No change proposed. Requirements for developments to provide open space and contribute to walking and cycling are adequately dealt with already through Local Plan policies.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
6	15	Canal and River Trust		<p>We have suggested some amendments and additional comments on Principle LOS-GIBP1 as highlighted, below:  PRINCIPLE LOS-GIBP1: Delivering urban greening and biodiversity in linear open spaces  All development proposals should support high quality greening and biodiversity in Linear Open Spaces. Proposals should:</p> <p>b) where possible, <u>improve accesses to, and extend the width of green corridors created by canals, rivers and rail sidings to provide new or enhanced connections between these green corridors for walking and cycling;</u>  c) ensure rain gardens and swales are provided between the waterside and any nearby roads or car parks to intercept <u>and clean up</u> run off from hard surfaces <u>from entering waterbodies</u> such as the Grand Union Canal;  f) "where possible, provide a riparian zone between the interface between land and canal. This should consider:  i. creating new reedbeds or marginal planting where navigation constraints allow."</p> <p>Reed bed proposals within the OPDC area</p>	<p>Change proposed.  The suggested wording change for clean up has been incorporated, although the suggestions in section b) are already included. The need for consultation with the Canal and River Trust in respect of reed beds was already included in paragraph 7.62.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
				<p>should be considered in consultation with the Canal &amp; River Trust to ensure there are no potential adverse impacts on navigation, waterway walls, canal infrastructure or other canal operations and maintenance. A formal agreement with the Trust would be required to deliver biodiversity enhancements in our waterways. As part of this the Trust will, amongst other things, expect that ongoing management and maintenance liabilities are addressed.</p>	



Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
6	16	Canal and River Trust		<p>Page 116</p> <p>The Fig 7.12 graphic shows a long line of boundary railings between the canal space and adjacent sites, which we would not encourage as a standard approach for canalside sites. We would suggest limited use of railings should be shown, with a more open interface between the canal and surrounding areas.</p>	<p>No change proposed.</p> <p>It is recognised that along the canal there will be a need for fencing for security purposes.</p>
7	1	Environment Agency	General	<p>Thank you for consulting us on the above document on 1 February 2024. We have now reviewed the document titled “Public Realm and Green Infrastructure – Supplementary Planning Document”.</p> <p>We have provided some flood risk advice as well as some more detailed comments from a biodiversity perspective. Regarding this perspective, we believe that the report has opportunity present to increase in biodiversity across the area and also opportunities of further development.</p>	Noted.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
7	2	Environment Agency	Chapter 5 – Principle GIBP1	<p>1. Urban Greening and Ecology</p> <p>1.1 Principle GIBP1 - Conserving, restoring, enhancing, and delivering urban greening and biodiversity.</p> <p>We commend the policy for developments for considering biodiversity net gain (BNG) from the onset of the design process and following the mitigation hierarchy to minimise impacts. To strengthen the policy, we recommend including a minimum requirement of 10% gain. This is in line with the published guidance <a href="https://www.gov.uk/guidance/understanding-biodiversity-net-gain">https://www.gov.uk/guidance/understanding-biodiversity-net-gain</a>.</p>	<p>No change proposed.</p> <p>The greater than 10% Biodiversity Net Gain requirement is already included in the SPD at Principle GIBP1 p).</p>
7	3	Environment Agency	Chapter 5 – Principle GIBP1	<p>Irreplaceable habitats should be identified early on and good practice dictates that losses of irreplaceable habitats (or statutory designated sites) cannot be offset to achieve BNG. The mitigation hierarchy should be undertaken with full regard for irreplaceable habitats and statutory designated sites.</p>	<p>Noted. There are not any known identified irreplaceable habitats within the Old Oak and Park Royal area but if these were to be identified and impacted, they would be protected in accordance with legislation.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
7	4	Environment Agency	Chapter 5 – Principle GIBP1	The development BNG design should contribute towards local and strategic priorities for biodiversity. Actions to enhance biodiversity should focus on Biodiversity Opportunity Areas (BOAs) within the area, which is to ensure that habitat enhancement, restoration and recreation projects make the most of opportunities to establish more extensive areas and networks of wildlife habitats. Local Nature Recovery Strategy /local environmental plans to help drive connectivity should be referred to within this policy. Their aim is to expand, improve and connect these places within corridors across urban areas and countryside to address biodiversity loss.	Noted. The Local Plan identifies the importance of providing ecological connectivity between habitats.
7	5	Environment Agency	Chapter 5 – Principle GIBP1	This principle could provide an opportunity for connected networks that maximise opportunities for biodiversity net gain with the creation of new priority habitats and green/blue infrastructure – helping to meet the requirements of Policy SP8 of the OPDC Local Plan 2022. Developments can then strategically be located to complement and optimise the LNRS. Biodiversity Opportunity Areas could be a lever to improve habitat management and enhance connectivity for the	No change proposed. The SPD is not spatial so it is not appropriate for the SPD to identify specific locations for ecological enhancements. Principle GIBP1 f) iv) identifies that developments should consider and include in their Design and Access Statements details on how their biodiversity provision is helping to connect fragmented green infrastructure.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
				recovery of Priority Species in a fragmented landscape.	
7	6	Environment Agency	Chapter 5 – Principle GIBP2	Infrastructure should be located, planned, designed, and maintained to be resilient to climate change. Developments should be strategically located and designed to complement the LNRS and should not impact on protected and irreplaceable habitats. We believe that this principle should highlight the importance of habitat connectivity and wildlife corridors and networks and how this will be achieved. This is in line with the National Planning Policy Framework (NPPF) and your policy SP8,. Enhancement and improvements to green and blue habitats will improve biodiversity and provide wildlife resilience to climate change.	No change proposed. The need to consider connectedness is already included in Principle GIBP2 b) and is included in Principle GIBP1. There are not any known identified irreplaceable habitats within the Old Oak and Park Royal area but if these were to be identified and impacted, they would be protected in accordance with legislation.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
7	7	Environment Agency	Chapter 5 – Principle GIBP3	We would like to see development demonstrate how the mitigation hierarchy has been applied by following a sequential approach to avoid, minimise, mitigate, and finally compensate for (on then off-site) any harm to biodiversity. Development must, as a minimum, strive to secure adequate buffers to valuable habitats. Development within 10m of a river would be considered to have a negative impact - this provides an effective and valuable river corridor and improves habitat connectivity. A 5m buffer zone for any ponds would also help to protect their wildlife value and ensure that the value of the adjacent terrestrial habitat is protected. These buffers should link habitats to create ecological corridors where possible.	No change proposed. The mitigation hierarchy is set out in Principle GIBP1. Principle GIBP1 already identifies the need to be sensitive to existing ecological habitats and the supporting text to this principle at paragraph 5.7 states that this may require the use of appropriate buffer zones.
7	8	Environment Agency	Chapter 5 – Principle GIBP4	We would make recommendations that SuDs should be designed to mimic the natural catchment processes as closely as possible. Ecological benefits should be maximised through use of native trees planting, enhancing, or retaining natural drainage systems and creating a range of habitats. An appropriate maintenance and management plan should also be implemented. There may be a need to retain or adapt a particular drainage regime to suit a	Change proposed. Wording has been inserted at the end of paragraph 5.35 to identify the need for SuDS to attempt to mimic natural catchment processes and identify the importance of appropriate maintenance and management plans.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
				particular habitat requirement and there may be specific habitat requirements as a result of local Biodiversity Action Plans (BAP).	
7	9	Environment Agency	Chapter 7 – Principle OS-GIBA1	We welcome the ambition to plant 70% native species. This makes a strong contribution to enhancing biodiversity.	Noted
7	10	Environment Agency	Chapter 7 – Principle LSP-GIBP1	Local Wildlife Sites, local parks and open spaces are often as valuable if not more so than designated sites to the local landscape, containing locally important and rare species. They can be stepping stones which in turn supports a wildlife corridor within a biodiversity opportunity area. They form the building blocks for Local Nature Recovery Strategies (LNRS).	Noted.
7	11	Environment Agency	Chapter 7 – Principle	<b><u>Biodiversity perspective</u></b> We welcome the recommendation to carry out River Condition Assessment and improve	No change proposed. Principle GIBP1 already identifies the need to be sensitive to existing ecological habitats and the

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
			LOS-GIBP1	<p>riparian zone/buffer zone from the Grand Union Canal. This approach provides an opportunity to enhance and restore a heavily modified riverine habitat. It also contributes to Thames River Basin Management plan to improve the WFD status of the River Brent to Good Ecological Potential Status (GEP). We recommend that development include a 10m buffer from top of bank. Buffer/riparian zones should be of natural character, free from built environment, no light pollution greater than 2 lux, use of native species, and endeavour to reconnect with floodplain.</p> <p>All buildings next to watercourses should be sufficiently set back to not overshadow river channels. Excess shading hinders the growth of some riverine plants which impacts on foraging species and consequently biodiversity. Buildings should be designed to minimise the impact of shading to sensitive receptors such as rives and wetlands; an assessment of the impacts should be provided with the development proposal.</p>	supporting text to this principle at paragraph 5.7 states that this may require the use of appropriate buffer zones.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
7	12	Environment Agency	Chapter 7 – Principle LOS-GIBP1	We also recommend the inclusion of wording which covers invasive non-native species and their management, including biosecurity measures. Invasive species are a growing issue and must be addressed to stop the spread. Development sites should be checked for invasive species and measures should be put in place to follow biosecurity and eradicate the invasive species on site. We would advise engagement with the Environment Agency early on in development projects adjacent to main watercourses.	Change proposed. Reference to the need to remove invasive non-native species and maintain continual management has been added to Principle GIBP1.



Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
7	13	Environment Agency	Chapter 7 – Principle LOS- GIBP1	<p><b><u>Flooding perspective</u></b></p> <p>It is good to see that spaces adjacent to canals are being showcased for improved biodiversity, accessibility and water quality. While not defined as a 'Main River', their riparian zones can be very valuable in creating an environment that local residents can access, and one where mammals and other water-based animals can thrive. Blue corridors should be emphasised more, and their benefits. There is some mention already, however there should be more detail; specifically on their benefits in reducing flood risk by creating floodplain that is more dense and rougher to reduce run-off; this applies to both canals and more natural main rivers.</p> <p>While the Stonebridge Main River Culvert runs underneath major infrastructure, there could still be scope to explore options of keeping a sufficient buffer zone from the culvert. Development that requires planning permission or a Flood Risk Activity Permit (FRAP) will require consultation with the Environment Agency. We strongly object to development on or within 8m of Main River culverts, and will require unnecessary development to be set</p>	<p>No change proposed.</p> <p>It is considered that sufficient detail is already included in the SPD in respect of blue infrastructure and its importance. The SPD is not spatial so it is not an appropriate policy vehicle within which to set an 8m set back requirement for a main river culverts.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
				back. This could mean that more land is available for green space and flood attenuation above/in proximity to the culvert. The SPD should better encourage buffer zones for Main Rivers such as the Brent, regardless if they are culverted or open channel.	

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
7	14	Environment Agency	Chapter 7 – Principle CP-GIBA1	We would like to promote the design of new development with improved environmental performance to increase resilience to climate change. Utilising these to enhance habitats e.g. provide built in bat and bird bricks, and boxes to provide long term roosting and nesting provision, plus utilising biophilic design to counteract the Urban Heat Island Effect and promote biodiversity would be beneficial to the area.	Noted. Requirements for roosting and nesting including nesting bricks, have been incorporated into the SPD. The concept of biophilic design is cross-cutting throughout the SPD. We share the ambition for the built form and nature to be seamlessly integrated and the multitude of benefits this can bring, such as to mitigating the Urban Heat Island Effect.
7	15	Environment Agency	General	<p>3. Fluvial Flood Risk</p> <p>3.1 General Comments</p> <p>There is very little 'Main River' in the OPDC area. The River Brent runs culverted underneath the railway line at Stonebridge Park (adjacent to the A406) to the North East of the site for about 300+ metres. Given that it is a culvert and underneath a major road and railway, we don't imagine there is much that could be done in terms of improving the green/blue infrastructure on the Brent in this location. Deculverting likely isn't an option due to site constraints.</p>	Noted.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
7	16	Environment Agency	General	<p>However, there are areas of Flood Zones 2 &amp; 3 from the Brent in this area; they are mostly confined to the A406. There is no mention of fluvial flood risk in this document, and so we recommend that the SPD links back to the relevant sections of the Local Plan and ways that layout and future SuDS infrastructure would help mitigate fluvial flooding. This is in accordance with Local Plan Policy EU3: Water (2022), specifically f); 'Demonstrate that development within the area at risk of fluvial flooding from the River Brent (see figure 6.4), reduces flood risk and improves flood storage in the area...'.  There should be acknowledgement of the fluvial flood risk from the Brent, regardless of how much of the district is inundated. Robust and maintained SuDS and BNG Infrastructure can help alleviate fluvial flooding by holding water back, utilising floodplain and limiting discharge and direct run-off into watercourses.  We would like to see how SuDS links back to fluvial flood risk, and the ways in which appropriately located water retention schemes</p>	<p>No change proposed. The purpose of the SPD is to provide further more detailed guidance to OPDC's Local Plan policies where appropriate. There is not any further detailed guidance required in respect of fluvial flood risk. Therefore, it is not considered necessary to replicate policy already in OPDC's Local Plan.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
				<p>can reduce fluvial flood risk. As a whole, the SPD is strong and contains valuable guidance built off existing policies. It could be improved by acknowledging the risk of fluvial flood risk in the area and highlighting further how suitably located SuDS can 'slow the flow' and reduce strain on our Main Rivers, namely the nearby Brent. Whilst only flowing through a small section of the OPDC boundary, flood risk is complicated and can be influenced by small changes near and far from our watercourses. Ensuring that development across the wider site acknowledges it's influence on the Brent will help mitigate the effects of climate change and increased severe weather events.</p>	

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
8	1	Defence Infrastructure Organisation	General	<p>I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to Old Oak and Park Royal Development Corporation (OPDC) Draft Public Realm and Green Infrastructure SPD and Statement of Community Involvement Consultations.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other parts of the MOD.</p>	Noted.

8	2	Defence Infrastructure Organisation	General	<p>Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by ‘ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.’ Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.</p> <p>The authority area of the OPDC is washed over by safeguarding zones associated with RAF Northolt, specifically aerodrome height and birdstrike safeguarding zones.</p> <p>Copies of these relevant plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.</p> <p>The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and</p>	<p>Noted. Paragraph 2.9 confirms that the OPDC area is covered by safeguarding zones associated with RAF Northolt, specifically aerodrome height and a bird strike safeguarding zone.</p>
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			<p>the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.</p> <p>To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of each of the safeguarding zone types is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.</p> <p>The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Colour coded zones are marked on safeguarding maps that provide heights which, if proposed development would reach or exceed them, would trigger MOD consultation. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the change of use of land to allow/facilitate flying activities; and the use of cranes, piling rigs or other tall plant or</p>	
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				equipment to implement development may also be of concern.	
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8	3	Defence Infrastructure Organisation	Chapter 5 – Principle GIBP1	<p>Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes and marked on safeguarding maps with a heavy dotted line. Aircraft within these zones are most likely to be approaching or departing aerodromes and would be at critical stages of flight. Within these statutory consultation zones the creation or enhancement of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include:</p> <ul style="list-style-type: none"> <li>- the landscaping schemes associated with developments including the provision of green/brown roofs, or roof gardens. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and MOD consulted where any element falls within the marked statutory safeguarding zone; and/or</li> <li>- the creation of new waterbodies such as reservoirs, wetlands, ponds and/or attenuation basins and other elements associated with sustainable drainage systems.</li> </ul> <p>The proposed Draft Principle GIBP1: Conserving, restoring, enhancing and delivering urban greening and biodiversity identifies that</p>	<p>Noted. OPDC's adopted Local Plan policies already support the delivery of new and enhanced green infrastructure and open spaces, including green roofs, urban greening and sustainable drainage (SuDS). The SPD does not and can not create new policies; it only provides more detailed guidance on how to proposals could comply with existing policies and it also encourages best practice where possible. The SPD specifically focuses on conserving, restoring, enhancing and delivering urban greening and biodiversity.</p> <p>As this is aligned to OPDC's Local Plan, the guidance is not considered to create additional risks beyond what is in the Local Plan. Notwithstanding this, the MOD is a consultee for relevant planning applications. Therefore, the MOD can consider any site specific risks related to the construction process, proposed buildings, open spaces and green infrastructure when they are consulted on planning applications.</p>
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			<p>“All development proposals should conserve, restore, enhance and deliver: d) Urban Greening Factor, Biodiversity Net Gain and water attenuation requirements, to maximise the combined benefit”: and “All development proposals should deliver p) <math>\geq 10\%</math> Biodiversity Net Gain between baseline and post development scenarios through the creation of higher distinctiveness habitats”</p> <p>The MOD request that; when drafting policy and principles which addresses biodiversity, ecology, and Biodiversity Net Gain; the Corporation bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.</p> <p>In addition, the creation of areas of open water, woodland, or planting of berry/fruit bearing species may form an attractant to those large and/or flocking bird species hazardous to aviation safety. In addition, trees, shrubs, and other vegetation may also impact on aviation safety by forming a physical obstacle to aircraft approaching or departing an aerodrome, or by degrading the operation and capability of</p>	
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				<p>technical assets used to manage air traffic. The MOD request that the wording of the Principle GIBP1 is broadened to inform developers that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported.</p>	
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Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Para/Figure/ Principle Ref.	Comment	OPDC Response
9	1	Natural England	General	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p>	Noted.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
9	2	Natural England	General	<p>Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p>	<p>No change proposed. The SPD relates to the public realm rather than on site development. OPDC's Local Plan already provides clear planning policies for onsite provision of public open space and green infrastructure, including requisite Urban Greening Factor scores which must be achieved.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
9	3	Natural England	General	<p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> <li>• green roof systems and roof gardens;</li> <li>• green walls to provide insulation or shading and cooling;</li> <li>• new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).</li> </ul>	Noted. This can often be done without planning permission but where planning permission is required, the guidance in this SPD would be applied.
9	4	Natural England	General	<p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p>	<p>No change proposed.</p> <p>These matters are considered to fall outside of the scope of the SPD.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
9	5	Natural England	General	<p>Biodiversity enhancement</p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p>	<p>No change proposed.</p> <p>The SPD guidance relates to the public realm and public private realm. The SPD already provides guidance on bat roost and bird boxes within this context.</p>
9	6	Natural England	General	<p>Landscape enhancement</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the</p>	<p>Noted. The SPD provides a wide range of guidance aimed at supporting enhanced access to nature. The SPD also requires good design principles - the right tree in the right place and early consideration to be given to the integration of green infrastructure within developments and the public realm.</p>



Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
				character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.	
9	7	Natural England	General	Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).	No change proposed. The SPD includes a principle on lighting (HCDP6), which recognises the importance of designing lighting to mitigate impacts on biodiversity (b)iv)).
9	8	Natural England	SEA Screening Assessment	Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats	Noted. Natural England was consulted on the Strategic Environmental Assessment Screening Statement and responded confirming that there are unlikely to be significant environmental effects from the proposed plan and view the proposals contained within the plan would not have significant effects on sensitive sites that Natural England has a statutory duty to protect. The report determines that a Strategic Environmental Assessment is not required.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
				Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.	
10	1	Historic England	General	Thank you for consulting us on the above SCI and Supplementary Planning Document (SPD). We have no comments to make on the proposed SPD in historic environment terms. If any specific heritage issues arise as a result of the consultation please not hesitate to contact us.	Noted.
11	1	Ealing Cycling Campaign	Chapter 6 – Principle MIP3	Ealing Cycling Campaign welcomes the proposals to run cycle routes through green spaces. We were pleased to see the general requirement for a minimum 3.0m width for two-way cycle paths at Principle MIP3 in Chapter 6.	Noted.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/ Figure/ Principle Ref.	Comment	OPDC Response
11	2	Ealing Cycling Campaign	Chapter 6 – Principle MIP3	Where a route, even if only at certain times of day, feels relatively remote and has few users and is not overlooked, some cyclists will not feel safe using it especially after dark. In these places, alternative routes should be provided which are well lit, well surfaced and maintained, and available 24/7.	No change proposed. The Local Plan includes a comprehensive network of cycle routes including those on or adjacent to highways which will be overlooked. The SPD provides guidance to ensure that these routes will be adequately lit (Principle HCDP6)- and the SPD provides other guidance to ensure these routes are safe, including providing active frontages onto streets and providing CCTV.

11	3	Ealing Cycling Campaign	Chapter 6 – Principle MIP3	<p>One of the supporting documents for this SPD is the 2019 Canal Placemaking Study. We are concerned that this study suggested an inadequate width for the canal towpath. The fact that a path is next to a canal does not alter the physical space needed for cyclists to pass each other. We are therefore repeating the comments we made on the draft Old Oak West SPD regarding this topic, as follows:</p> <p>“Canal towpath The supporting document “Canal Placemaking Study 2019” suggests a towpath width of 2.0m plus verges. Given the density of adjacent development within the SPD area this will not be sufficient. The recommended minimum width for shared use paths (LTN 1-20 table 6.3) is 3.0m. Experience has shown that the provision of adequate width is a key factor in avoiding conflict between different classes of user. A hard surfaced width of 2.0m plus well maintained verges may just suffice in unpopulated areas which are sufficiently remote that many people will not choose to walk there, but where the towpath runs through a densely populated residential area a width greater than 3.0m is required. For busy routes LTN 1-20 recommends a width of 4.5m (table 6.3).</p> <p>However, LTN 1-20 strongly discourages shared-use paths in built-up areas:</p>	<p>No change proposed.</p> <p>The recommendations in the Canal Placemaking Study have not been incorporated into the Local Plan or the SPD. This will enable appropriate widths to be delivered although it should be recognised that the canal and towpath are constrained by factors such as the canal's navigable width, bridge parapets and private land holdings.</p>
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			<p>"1.6.1 .....Shared use routes away from streets may be appropriate in locations such as canal towpaths... including in cities. Where cycle routes use such paths in built-up areas, you should try to separate them from pedestrians, perhaps with levels or a kerb."</p> <p>"6.5.4 .....Shared use facilities are generally not favoured by either pedestrians or cyclists, particularly when flows are high. It can create particular difficulties for visually impaired people. Actual conflict may be rare, but the interactions between people moving at different speeds can be perceived to be unsafe and inaccessible, particularly by vulnerable pedestrians."</p> <p>As a shared path, the canal towpath when widened will be suitable as a leisure route. However unless it is possible to widen it sufficiently to provide a segregated cycle path, it will not be suitable for commuter cycling. To avoid high volumes of cyclists on the canal towpath, an alternative east-west segregated cycle route is required."</p>	
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Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/Para/Figure/ Principle Ref.	Comment	OPDC Response
12	1	Local Resident 1	Chapter 5 –Urban greening and ecology	Q2. What do you like about the SPD Principles/Ambitions for Urban greening and Ecology related to all Public Realm and Open Spaces ? It looks mostly like a plan to tidy up after major construction. The issues that remain are rubbish everywhere especially by the canal and pollution. The plan do not resolve these issues.	No change proposed. The SPD proposes a variety of interventions which will improve pollution and littering. This includes using SuDS to clean water before it enters watercourses (GIBP4) and requirements throughout the SPD for litter bins, ongoing management and maintenance arrangements and delivery of active frontages and boundary treatments which encourage overlooking of the public realm, improving security and helping to reduce crime.
12	2	Local Resident 1	Chapter 5 – Heritage, character and design	Q4. What do you like about the SPD Principles for Heritage, character and design related to all Public Realm and Open Spaces? It's ok but hard to say before all major new construction is completed. The new Folio area is an example of how greening the area might difficult as developers will prioritise residential development and only making small required green spaces that are easy to manage. The blocks also stop away from the canal whereas it would have made sense to create access to the canal through the Folio development. Are these type of connections part of the plan to make the area more joined up? Also note no shops or restaurants have moved in to the new	No change proposed. The SPD does not deal with particular schemes as it is not spatial but the Oaklands development (Folio development) has a development site to its north which makes it impossible for this development to connect to the canal. When the northern site is brought forward, connections to the canal will be provided.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				development. This will be a major crisis if the area develops in this way.	
12	3	Local Resident 1	Chapter 5 – Heritage, character and design	Q5. How could the SPD Principles for Heritage, character and design related to all Public Realm and Open Spaces be improved? Massively along the canal and repurposing some of the old unused buildings that exist along the canal. Enlarging house boats will also bring in a community likely to nurture and care for green spaces in the local area and canal especially. The canal should be at the heart of this area because many other areas will remain through roads and not attractive to use. On big Woodward scrubs there are major campaign to leave the field without any change so connecting roads across to North Kensington for example will need to be planned away from the big field and not across or on it in any way. I see there is plan for a new smaller park by the new station which is good and will make sure that big wordwood scrubs remains less busy. There is appetite for a lido by the running track car park.	No change proposed. Re-use of buildings along the canal and principles for encouraging boat moorings are outside of the scope of the SPD but policies in the Local Plan look to secure this (Policies P3 and D7

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
12	4	Local Resident 1	Chapter 5 –Equity, Diversity and Inclusion	Q6. What do you like about the SPD Principles for EDI (Equity, Diversity and Inclusion) related to all Public Realm and Open Spaces? Hard to define without know what type of residents the area will attract. A lot of the new residents are temporary renters so don't have particular strong views on inclusion in the area as they don't yet live here. Probably more important that the planning represents EDI principles well to make sure the plans have considered EDI aspects of planning.	Noted. Officers consider the SPD to provide a breadth of guidance in respect of EDI to ensure that EDI is appropriately considered in the planning and delivery of development.
12	5	Local Resident 1	Chapter 5 – Microclim ate and pollution	Q8. What do you like about the SPD Principles/Ambitions for Microclimate and pollution related to all Public Realm and Open Spaces? Good luck..	Noted.
13	1	Local Resident 2	General	Both the OPDC Local Plan and this SPD refer to the lakeside area and park within the 'Brewery Cluster' which includes residential development around Lakeside Drive as 'Publicly Accessible Open Space'. This is not correct. This space is paid for and maintained by service charges paid by leaseholders around the lake. The lake and park area are closed off by a fence and require a code to access them. If the OPDC wish to claim this as public open space then the local	Change proposed. Figure 2.3 has been amended to reflect the open status as public and/or communal open space.  OPDC acknowledges the issue around maintenance and service charge for existing residents but aspires for this open space to be public open space in the future.



Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				authority should become responsible for its upkeep, then they should take over the space and relieve leaseholders of huge service charges/estate charges that are levied on leaseholders.	
13	2	Local Resident 2	General	More work on the urban greening of Coronation Road is required. The planting of significant trees and additional green space here could deter the amount of vehicles parked over footpaths from motor vehicle uses and improve the quality of the amenity of the area. The area is significantly poor and provides a barrier between the Brewery Cluster and the Park Royal Town Centre. Linear green spaces should be considered here as well as lighting improvements and street furniture, in line with Figure 5.18 of the SPD	No change proposed. Coronation Road falls within the definition of a 'secondary street' and the guidance in the SPD would be applied to future enhancements to this street. OPDC will improve Coronation Road and other roads in line with this guidance when schemes come forward and/or funding becomes available.
14	1	Local Resident 3	Chapter 5 –Principle HC DP5	(1) Public areas should use main-stream hard surface products that reasonably are still going to be available in five or ten years' time, for repairs and maintenance. Do not use short-production-run specialist materials, however more attractive they might be in the short term.	No change proposed. Readily maintainable materials does need to be factored in but equally OPDC does not want to discourage SME suppliers from providing public realm materials.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
14	2	Local Resident 3	Chapter 5 –Principle GIBP1	(2) 'Pocket parks' should always have at least one direct connection to the general undeveloped greenery of the area, to allow natural flora and fauna transfer.	No change proposed. The SPD already promotes the interconnectivity of spaces. However, it may not always be possible for every pocket park to be connected to adjacent open spaces.
14	3	Local Resident 3	Chapter 5 –Principle HCDP2	(3) Utility buildings such as sub-stations should be reasonable designs specific for their locations, not generic ones. Boundary security fences must avoid bayonet or similar ugly designs.	No change proposed. The design of substations is outside of the scope of the SPD. The SPD promotes well designed and ideally green boundary treatments in Principles HCDP2, OS-GIBP1 and LSP-EDIP1.
14	4	Local Resident 3	Chapter 6 –Principle MIP2	(4) Likely desire lines should be rigorously anticipated, to avoid ugly flattening of ground-cover plants, etc. by the treading down over time of informal paths.	Change proposed. The cycle principle MIP3 already recognised the need for routes to be aligned to desire lines but this was remiss from the pedestrian principle MIP2. The principle has been amended to include the need for routes to be aligned with desire lines.
14	5	Local Resident 3	Chapter 5 –Principle HCDP5	(5) Hard surfaces that might sometimes be driven over must have stronger foundations than otherwise they might have, to avoid physical distortion of the surfaces. Asphalt is better than pavers that crack and look ugly over time.	No change proposed. The requirement to give careful consideration to material choice in respect of wear and tear and use is already covered in Principle HCDP5 (choice of materials)
14	6	Local Resident 3	Chapter 5 –Principle HCDP2	(6) It should always be apparent to the public, even if only informally, who the owner of pieces of land are, the owners being the ones who have to maintain them.	Change proposed. The need for information on who to contact in respect of maintenance issues has been added to Principle MMP1 (long term management and maintenance)

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
15	1	Local Business 1	General	It is good to see that OPDC are committed to improving the environmental impact and experience of the Park Royal area. I have for several years now been pressing the two councils responsible for my company's locale to attend to what I consider to be indefensible levels of street litter, flood water from blocked drains, abandoned vehicles, and flytipped waste. In particular I have highlighted the condition of the car park on Barratts Green road, a property owned by Brent council which despite my protestations for well over 2 years still has blocked drains and systemic litter issues.	Noted.
15	2	Local Business 1	Chapter 8 –Principle MMP1	As part of your consultation I would like to see a commitment to improving the cleanliness of the streets and properties throughout your entire area. It is unclear from the documents I have read if you consider all streets to be a part of this consultation but I would argue that without a holistic approach to the whole district the environmental impacts of litter and waste cannot be mitigated in anything like an effective way. To put into context the scale of the problem I recently visited Marrakech, I walked through deprived neighbourhoods and one of the	No change proposed. Street cleaning is usually the responsibility of the host local authorities and responsibilities fall outside of Town and Country Planning. However, the SPD through Principle MMP1 does require appropriate long term management and maintenance arrangements to be put in place for public realm. OPDC is actively working with the host boroughs, who have highways, parking enforcement and environmental health powers, to ensure that fly tipping, general waste collection, graffiti and other matters are dealt with swiftly.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				thoughts I came away with was how filthy park royal was in comparison to somewhere with much less trade, and a much smaller economy. I would be happy to walk you around the area so we can work out if what I see is within what OPDC think is acceptable.	
15	3	Local Business 1	Chapter 8 –Principle MMP1	Cleaning up should begin with regular street sweeping, where vehicles are parked for months on end restrictions should be enforced to allow cleaning road gullies. Flytipping on the streets should be cleared within 48hrs, flytipping to private land should be actively pursued, offering assistance with clearing waste that has been tipped, and advice to property owners to stop such tipping occurring in the first place. A policy of speaking to nuisance businesses whose property is permitting flytipping and verge-litter to accrue should be enacted to encourage active engagement of the business community, the purpose of this to be properly explained so the businesses don't see it as the Nanny State.	No change proposed. Street cleaning and fly tipping on public highways is usually the responsibility of the host local authorities and responsibilities fall outside of Town and Country Planning. However, the SPD through Principle MMP1 does require appropriate long term management and maintenance arrangements to be put in place for public realm.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				Boundaries of green spaces should be particularly protected to avoid litter from surrounds being blown into those areas.	
15	4	Local Business 1	Chapter 8 –Principle MMP1	Waterways should be protected from pollution, in particular the canal which is currently in very poor condition.	No change proposed. Principle GIBP4 requires SuDS to filtrate water before it enters into any watercourses.
15	5	Local Business 1	Chapter 8 –Principle MMP1	Street Bins should be provided and they should be emptied, my experience with councils has been that they don't like bins because if they get full then waste spills out, they have in many cases removed street bins because of this. My daily walks around the area tell me that this policy of removal makes the litter less dense but more widespread. After the introduction of bins in the carpark as was enacted (after many requests) it reduced the litter by a huge amount, but the bins are simply not emptied so its not	No change proposed. Principle ESP1 (achieving environmental sustainability) requires public waste bins to be provided. The importance of bin provision is also noted in the supporting text to Principle HCDP8 (street furniture).

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				hard to figure out what happens next, the system needs support or it will fail, it is a small cost to empty the bins regularly as opposed to killing off local wildlife and ruining freshly improved street and public space facilities.	
15	6	Local Business 1	Chapter 8 –Principle MMP1	My strong advice to you is as per the advice I presented during your consultation about the canal, sort out the basics, then improve the facilities. The canal redevelopment is a mess, the lack of bins, and thought, about rubbish and runoff has meant that within 3 days of it opening I considered it more littered than it was before the improvements. In my mind a waste of an opportunity to enact real change by simply not thinking behavioural issues through.	Noted.
15	7	Local Business 1	Chapter 8 –Principle MMP1	So, I implore you to think beyond the green spaces, to the streets and businesses that occupy your district. To accept that without a holistic and actively engaged approach the area will remain one of the most heavily littered I have seen in London and an environmental	Noted. The SPD seeks to ensure that a holistic approach is taken and that appropriate bin provision is made in the public realm.

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidanc e/Para/Fi gure/ Principle Ref.	Comment	OPDC Response
				black spot that will ruin everything else that you do.	
16	1	Local Resident 4	Chapter 8 –Principle MMP1	<p>The subject of graffiti was discussed with Pete Farnham. Graffiti is an act of vandalism and legally regarded as criminal damage. It can escalate into predatory crime because prospective offenders assume that residents are indifferent to what happens in their neighbourhood. Signs of decay signal neighbours' unwillingness to intervene when a crime is being committed or ask the police to respond.</p> <p>As such could you please consider including the word graffiti within the SPD, perhaps in section 5.168 along the lines of...</p> <p>5.168. Various things in the environment can provoke anxiety symptoms in public urban spaces. Common environmental factors include crowded spaces, poor lighting, graffiti, lack of privacy, lack of facilities such as toilets, confusing or chaotic layouts and safety concerns particularly in response to perceived violence and crime</p>	<p>Change proposed.</p> <p>Graffiti and litter has been added to paragraph 5.168.</p>

Res. Ref.	Com. Ref.	Respondent	Chapter/ Guidance/ Figure/ Principle Ref.	Comment	OPDC Response
				If there is anywhere else within the SPD where 'timely removal of graffiti as part of a well maintained public realm' could be mentioned, that would be great	