Statement of Consultation

Regulation 18 & Regulation 19(1) consultations

June 2018

Contents

1 INTRODUCTION 3

2 REGULATION 18 CONSULTATION 6

Overview of Consultation 6

Summary of Key Response Themes 11

3 REGULATION 19 (1) CONSULTATION 14

Overview of Consultation 14

Summary of Key Response Themes 20

4 ON-GOING CONSULTATION 24

Appendices (Regulation 18 Consultation)
Appendix A: Summary of Main Issues Raised and Officer Response (Regulation 18)
Appendix B: List of all Issues Raised and Officer Response (Regulation 18)
Appendix C: Organisations contacted as part of the Regulation 18 Consultation
Appendix D: Consultation Materials for Regulation 18 Consultation

Appendices (Regulation 19(1) Consultation)
Appendix E: Summary of Main Issues Raised and Officer Response (Regulation 19(1))
Appendix F: List of all Issues Raised and Officer Response (Regulation 19(1))
Appendix G: Organisations contacted as part of the Regulation 19 Consultation
Appendix H: Consultation Material for Regulation 19 Consultation

1 INTRODUCTION

OPDC

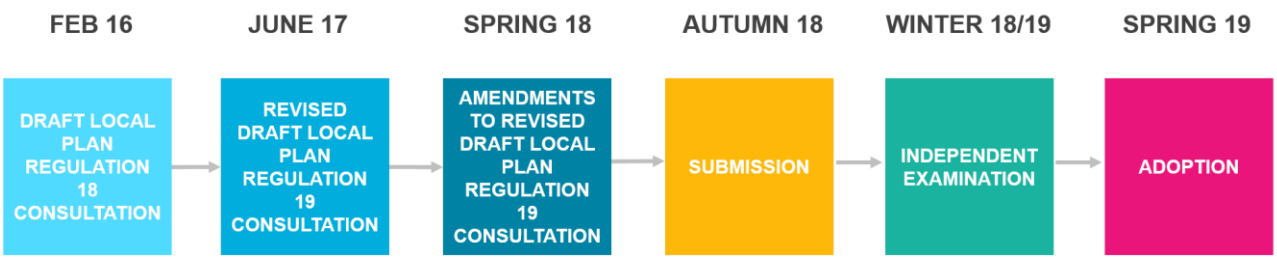
1.1 The Old Oak and Park Royal Development Corporation (OPDC) was established by the Mayor of London on the 1st of April 2015. The mission of the Corporation is to ensure that the maximum benefits for London are achieved through the once in a generation opportunity presented by the development of a major new transport hub in the area which will connect the Elizabeth Line with High Speed 2 and national rail services.

1.2 The OPDC area covers the Old Oak Common and Park Royal Opportunity Areas in the Mayor's London Plan (2015), which identifies the area as having a capacity to deliver a minimum 25,500 homes and 65,000 jobs. The London Plan identifies the Old Oak Common area alone, which will be the location of the new High Speed 2 and Elizabeth Line Station, as having the capacity to deliver a minimum 24,000 new homes and 55,000 jobs, making it the largest regeneration projection in the UK. Park Royal is Europe's largest industrial estate and is a vital cog in the London economy, accommodating over 1,700 businesses employing over 43,000 people. The Mayor's London Plan (2015) identifies that through redevelopment and intensification, it has the potential to deliver an indicative 10,000 additional jobs and a minimum of 1,500 additional homes.

Local Plan

1.3 Upon its establishment as a Mayoral Development Corporation, the OPDC also became the Local Planning Authority for the area, giving it responsibility for planning decisions and the preparation of a new Local Plan, which the Corporation has been progressing since its establishment. OPDC published a Regulation 18 Draft Local Plan for consultation in February 2016 and a Regulation 19 Revised Draft Local Plan in June 2017. The Independent Examination is envisaged to take place in winter 2018/19 with adoption due in early 2019. An updated Local Development Scheme (LDS) has been published alongside the second revised draft Local Plan, outlining the timetable for delivery of the Local Plan. The timetable for delivery is outlined in Figure 1.

Figure 1: Local Plan Timetable



Statement of Consultation

1.4 This Statement of Consultation provides information for two periods of consultation:

- Regulation 18 consultation
- Regulation 19(1) consultation (first round)

Regulation 18 consultation

1.5 This document accompanies the publication of the second Regulation 19 Consultation on the amendments to the Revised Draft Local Plan. A Statement of Consultation is required as part of the Local Plan consultation process by Regulation 17(d) of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Regulation 17(d) requires the Consultation Statement to set out, with regard to the Draft Policies Regulation 18 consultation:

- Which bodies and persons were invited to make representations;
- How those bodies and persons were invited to make representations;
- A summary of the main issues raised by those representations; and
- How those main issues have been addressed in the Local Plan.

Regulation 19(1) consultation

1.6 OPDC considers that the above approach is valuable in demonstrating how the emerging draft Local Plan has been shaped in response to issues raised through consultation. Therefore, this Statement of Consultation includes the above information for the first Regulation 19 consultation on the revised draft Local Plan.

1.7 Each issue summary from the Regulation 19(1) consultation is provided with a reference number. Where amendments to the Local Plan are proposed in response to an issue summary, this reference number is provided with the relevant amendment in the second revised draft Local Plan.

Statement of Community Involvement

1.8 OPDC's Statement of Community Involvement (SCI) explains how the Corporation will involve the community in deciding planning applications and preparing planning policy, and sets out how it will effectively utilise the rich wealth of knowledge that the existing communities have, in and around the OPDC area. The SCI outlines the measures to be undertaken in preparing the Local Plan to ensure adequate community involvement in the plan making process. These include:

- Inviting statutory and general consultees, residents and businesses in the OPDC area to comment on what the Local Plan should contain during a public consultation for a minimum of 6 weeks;

- Consulting bodies listed in the relevant regulations on the scope of the information and level of detail that should be included in the environmental report which accompanies the draft Local Plan. The environmental report addresses the requirements of the European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

- Emailing and writing to members of the consultation database throughout the Local Plan's preparation;

- Making consultation documents and questionnaires available on its website, at City Hall and public libraries;

- Holding meetings, discussion events and drop-in events / exhibitions;

- Issuing a statutory press notice, advertises in local press, uses the OPDC email newsletter and its social media sites to raise awareness.

1.9 All measures set out in the SCI have been undertaken by OPDC as part of the Local Plan Consultation process.

2 REGULATION 18 CONSULTATION

Overview of Consultation

2.1 Consultation was carried out in accordance with Regulation 18 of the Town and Country and Planning (Local Planning) (England) Regulations 2012 for an 8 week period between 4th of February to the 31st of March 2016.

Publication and Accessibility of Consultation

2.2 The following exercises were undertaken to invite the Regulation 18 consultation:

- Emails were sent to Statutory Consultees and Duty to Cooperate contacts, relevant Transport for London contacts all those on OPDC's consultation database. A list of all organisations contacted is provided in Appendix C;
- Regular updates on the consultation and activities were provided on OPDC's website and online engagement platform;
- Approximately 55,000 leaflets were distributed through letter drops to all residential and business properties within the area shown on Figure 2.
- Local adverts and press releases were placed in the Brent & Kilburn Times, Ealing Gazette, Harrow Times and London Weekly News in weeks commencing 1 February, 15 February, 29 February, 7 March and 21 March 2016;
- Social media announcements were made on Twitter and Facebook.

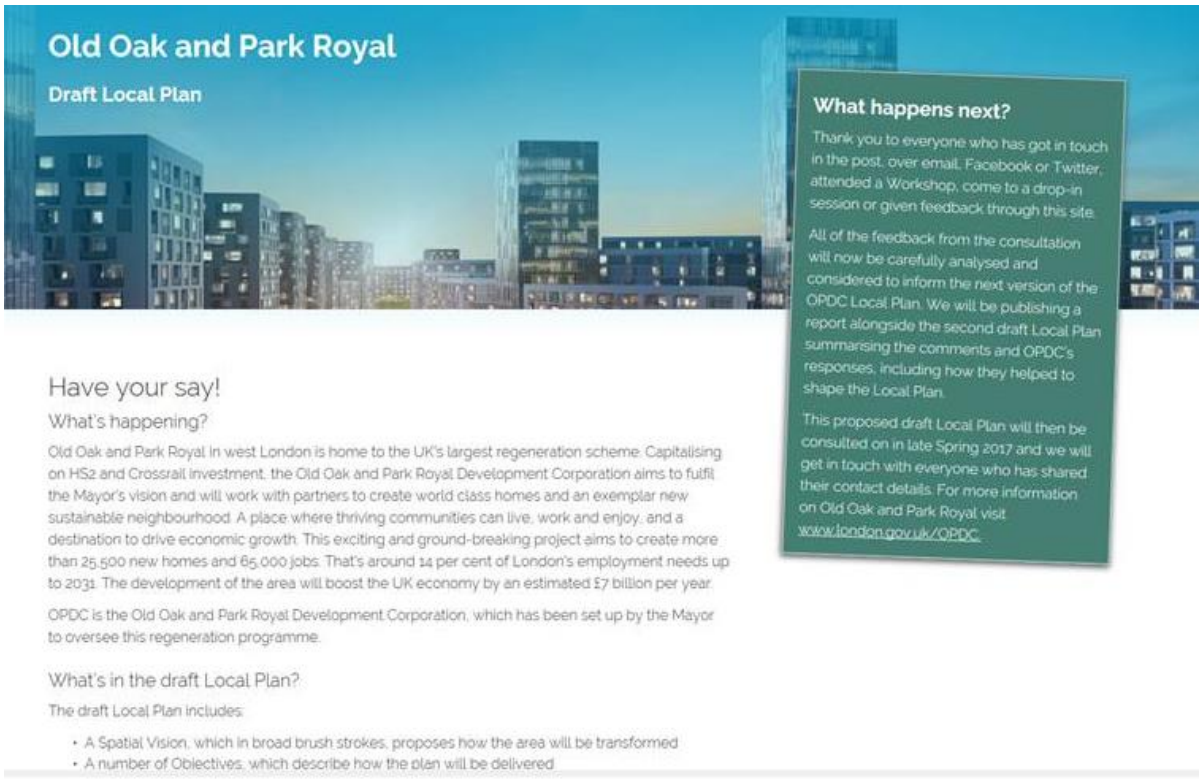
2.3 Copies of emails, letters, leaflets and social media engagements inviting representations on the Draft Local Plan are included in Appendix D.

Figure 2: Boundary of Letter Drop Area



2.4 Consultation Documents, including the Draft Regulation 18 Local Plan and all evidence base documents, were published online at https://opdc.commonplace.is/, an online engagement platform commissioned for the purposes of the consultation.

Figure 3: Regulation 18 Local Plan Consultation Website



2.5 Hardcopies of all Consultation Documents were also made available at the following locations:

- Acton Town Hall Library;
- Brent Civic Centre;
- Ealing Council Offices;
- Hammersmith Town Hall;
- Harlesden Library;
- Old Oak Community Centre;
- Shepard's Bush Library; and
- City Hall.

2.6 Reponses to the consultation were able to be submitted via email, post, the online engagement platform (opdc.commonplace.is), Twitter (#opdclocalplan), Facebook and by attending engagement events.

Consultation Activities

2.7 The following consultation activities were undertaken throughout the 8 week consultation period:

- 11 workshops held in and around the OPDC area (topics were Overview of the Local Plan, Community Infrastructure, Old Oak Places (1), Wormwood Scrubs, Design and Heritage, Old Oak Places (2), Park Royal Places, Employment, Transport, Environment, Open spaces and Public realm and Housing);
- Six drop-in sessions held in and around the OPDC area;
- Two live Twitter sessions held on 8 March and 30 March 2016; and
- Various local stakeholder events including Harlesden Town Team, East Acton Ward Form and Wormwood Scrubs Charitable Trust meetings.

Table 1: Details of Workshops held as part of the Regulation 18 Consultation

Date	Time	Venue	Topic
11/02/2016	18:00 - 20:00	Harlesden Methodist Church	Overview of Local Plan
13/02/2016	11:30 - 12:30	Small Hall, Old Oak Community Centre	Community Infrastructure
15/02/2016	18:00 - 20:00	Holiday Inn, North Acton	Old Oak Places (1)
20/02/2016	11:00 - 12:00	Linford Christie Stadium	Wormwood Scrubs
23/02/2016	18:00 - 20:00	Cumberland House, Scrubs Lane	Design and Heritage
24/02/2016	18:00 - 20:00	Cumberland House, Scrubs Lane	Old Oak Places (2)
02/03/2016	18:00 - 20:00	Holiday Inn, North Acton	Park Royal Places
03/03/2016	18:00 - 20:00	Holiday Inn, North Acton	Employment
07/03/2016	18:00 - 20:00	Harlesden Methodist Church	Transport
10/03/2016	18:00 - 20:00	Harlesden Methodist Church	Environment, Open Space and Public Realm
17/03/2016	18:00 - 20:00	Holiday Inn, North Acton	Housing

Table 2: Details of Public Drop-In Sessions held as part of the Regulation 18 Consultation

Date	Time	Venue
11/02/2016	14:00 - 17:00	Harlesden Methodist Church
13/02/2016	11:00 - 14:00	Large Hall, Old Oak Community Centre (Access from 10.30am)
15/02/2016	16:00 - 19:00	Holiday Inn, North Acton
24/02/2016	14:00 - 17:00	Cumberland House, Scrubs Lane (set up from 1pm)
02/03/2016	14:00 - 17:00	Holiday Inn, North Acton

17/03/2016	16:00 - 19:00	Holiday Inn, North Acton

Level of Response

2.8 The Local Plan resulted in Responses were submitted via email, letter, workshops, response slips at drop in sessions, the online engagement platform and Twitter.

- A total of **2,640 responses** were received via email and letter;
- A total of **192 people** attended the **11 Workshops** with representatives from community, public and private sectors in attendance;
- The online engagement platform had an extensive reach, with **nearly 29,000 views** from **over 6,000 individuals** providing **nearly 200 comments**.
- During the two dedicated live-Twitter sessions and throughout the consultation period OPDC received and responded to **80 tweets**.
- Drop-in sessions were generally well attended with an average of 15-20 people attending and a number of attendees completed response slips setting out their comments on the draft Local Plan.

Summary of Key Response Themes

2.9 The consultation response resulted in over **7,000 total individual responses**. Having assessed each individual response, OPDC has identified **2,300 issues themes** arising from these responses. Appendix B outlines each of these issues, and clarifies whether or not this has resulted in a change in the Regulation 19 Draft Local Plan.

2.10 Given the large number of issues raised, OPDC has identified a list of 155 Key Issues. The key issues summary is included in Appendix A, and highlights which respondents raised the issue and what actions (if any) OPDC have undertaken to address the issue.

2.11 To further distil the outputs of the consultation response, 27 subject themes have been identified, as outlined in Table 3. The bracketed numbers within Table 3 highlights the relevant key issues within Appendix A to which each theme relates to.

2.12 In both Appendices A and B, details have been provided on the stakeholders who raised each respective issue. Individuals' names have been anonymised as either a 'local resident' or 'local business'. Comments on OPDC's Online Engagement Platform, run by a company called Commonplace, have been anonymised as 'commonplace' and comments made at Local Plan drop-in events and workshops have been anonymised as 'workshop' comments.

Table 3 Key Issues Subject Themes

Theme	Issue
Integrating Communities (2, 5, 20)	Recognising existing communities and more clearly referencing the need to integrate existing and new communities in the spatial vision and strategic policies
Release of additional Strategic Industrial Land (9, 16, 64, 99)	Proposals to release additional strategic industrial land in Park Royal in order to create more of a buffer to existing residential communities and enable lower densities in Old Oak.
Accessible and Inclusive Neighbourhoods (10, 74)	Ensuring this new part of London is a network of accessible and inclusive neighbourhoods embedding the requirements for accessible and inclusive neighbourhoods throughout the Local Plan.
Densities (12, 22, 23, 29, 41, 61, 67)	Respondents questioned if the homes and jobs targets have been appropriately tested with regards the impact on the quality of place. Concerns were expressed that the overall densities may be too high and may need to be reduced, there was also concerns expressed about how very high density development would manifest in sensitive locations.
Balance between Jobs and Homes (13)	Requests for the jobs target to be lowered and the homes target increased.

Theme	Issue
Heights (22, 23, 61)	Concerns over the proposed number, height and location of tall buildings and the impact on the surrounding area and ensuring that where tall buildings are acceptable that they achieve a high standard of design and a wider social benefit
New Places (15)	The boundary of the proposed places should be revised and a series of suggestions were made for new places as well as alterations to proposed Place boundaries
Neighbourhoods and Strategic Site (25, 26)	The Local Plan needs to be clearer on the relationship between neighbourhoods and strategic sites.
Employment (98, 101)	Need to be clearer about the role, type and location of employment space, the future of park royal and how local people and businesses can access opportunities in the future
Sports Stadium (17)	Requests for the Local Plan to more explicitly support a sports stadium
Open Space (18, 33, 40, 76, 77, 143, 144)	Being clearer about the quantum, location and function of open space provision.
Wormwood Scrubs (19, 28, 68, 69, 70, 71, 72)	Concerns about more people using Wormwood Scrubs, what enhancements there might be and the visual impacts of development.
Environmental Sustainability (10, 24, 134)	A need to promote exemplar environmental sustainability policies throughout the Local Plan.
Willesden Junction (31, 32)	The need to connect Willesden Junction station and Harlesden into its surroundings and the potential for over station development in this location
Artists and SMEs (35, 101)	Support for artists' and creative workspace as well as other forms of SME workspace, particularly in Old Oak North.
Heritage Assets (36, 37, 79, 80)	Suggestions for potential heritage assets that warrant protection and support for OPDC identifying a local heritage list.
Town Centres (44, 45, 47, 50, 103, 104, 105, 106, 107)	Comments on the town centre hierarchy and concerns raised about the designation of a major town centre in Old Oak in particular in relation to the impact on surrounding centres.
North Acton (52, 53, 57, 58, 59, 97)	Concerns about the overconcentration of student housing in North Acton and the general quality of environment in this area.
Affordable Housing and Housing Mix (87, 88, 89)	The importance of delivering much needed new affordable housing that is genuinely affordable, it is also important to ensure an adequate mix of housing types.
Micro-housing (85)	The opportunity to support some level of micro-housing schemes such as the recently completed 'Collective' scheme.
Build-to-Rent (91,92,93)	The appropriateness of build-to-rent housing and the approach that should be taken to affordable housing contributions.

Theme	Issue
Social Infrastructure (112, 114, 116, 118)	The need for appropriate social infrastructure (education, health and community space) to be secured on-site to address the needs of future residents but also existing deficiencies in need, as well as the importance as to the timing of this social infrastructure.
Car Parking (120)	Concerns about the impact on the wider transport network, and therefore requests for more stringent controls of car parking.
Cycling (121, 126, 127, 128)	The need for more cycle infrastructure and for this to connect into the wider cycle network.
Waste (136, 137, 138, 139)	The need for further clarity on OPDC's approach to waste management
Air Quality (63, 146, 147)	Further consideration of how OPDC can set exemplary standards for managing air quality issues
Infrastructure and Phasing (150, 151, 152, 153, 155)	Comments relating to the phasing of sites, infrastructure provision, prioritisation and funding across both Old Oak and Park Royal

3 REGULATION 19 (1) CONSULTATION

Overview of Consultation

3.1 Consultation was carried out in accordance with Regulation 19 of the Town and Country and Planning (Local Planning) (England) Regulations 2012 for an 11 week period between 29th of June to the 11th of September 2017.

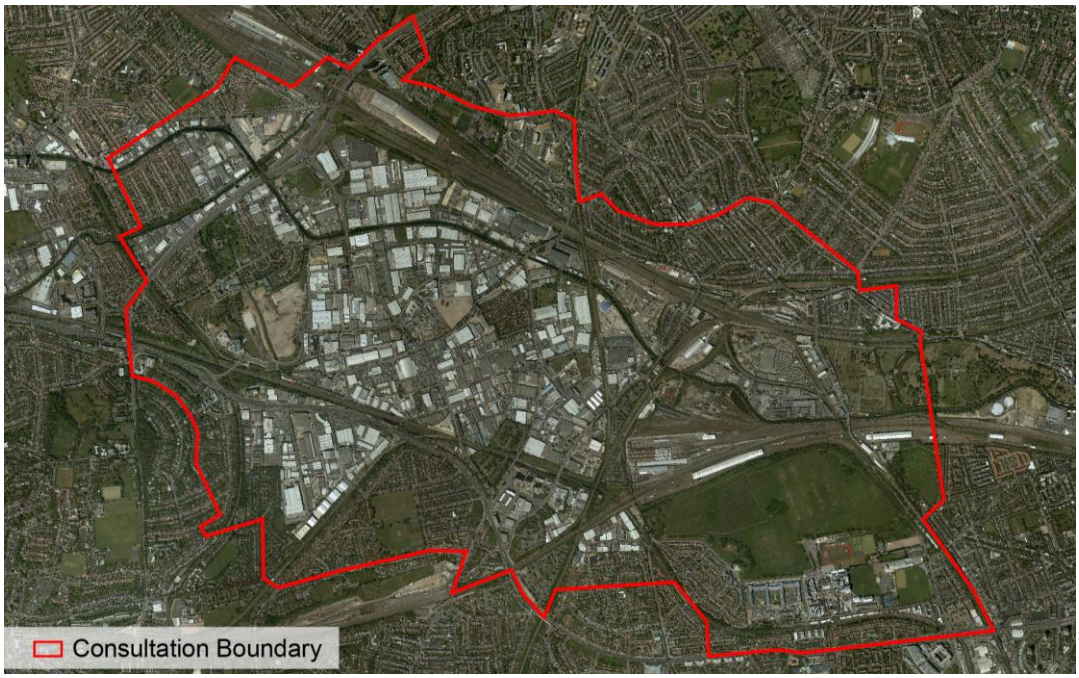
Publication and Accessibility of Consultation

3.2 The following exercises were undertaken to publicise the Regulation 19(1) consultation:

- Emails were sent to Statutory Consultees and Duty to Cooperate contacts, and all contacts listed on OPDC's Local Plan consultation database. A list of all organisations contacted is provided in Appendix G;
- Regular updates on the consultation and activities were provided on OPDC's website;
- Approximately 40,000 leaflets were distributed through letter drops to all residential and business properties within the area shown on Figure 4.
- Local adverts and press releases were placed in the Brent & Kilburn Times, Ealing Gazette, Hammersmith Chronicle and Harrow Times on the weeks commencing 24th July, 7th August, 21st August and 4th September.
- Regular social media announcements were made on Twitter, Facebook and LinkedIn.

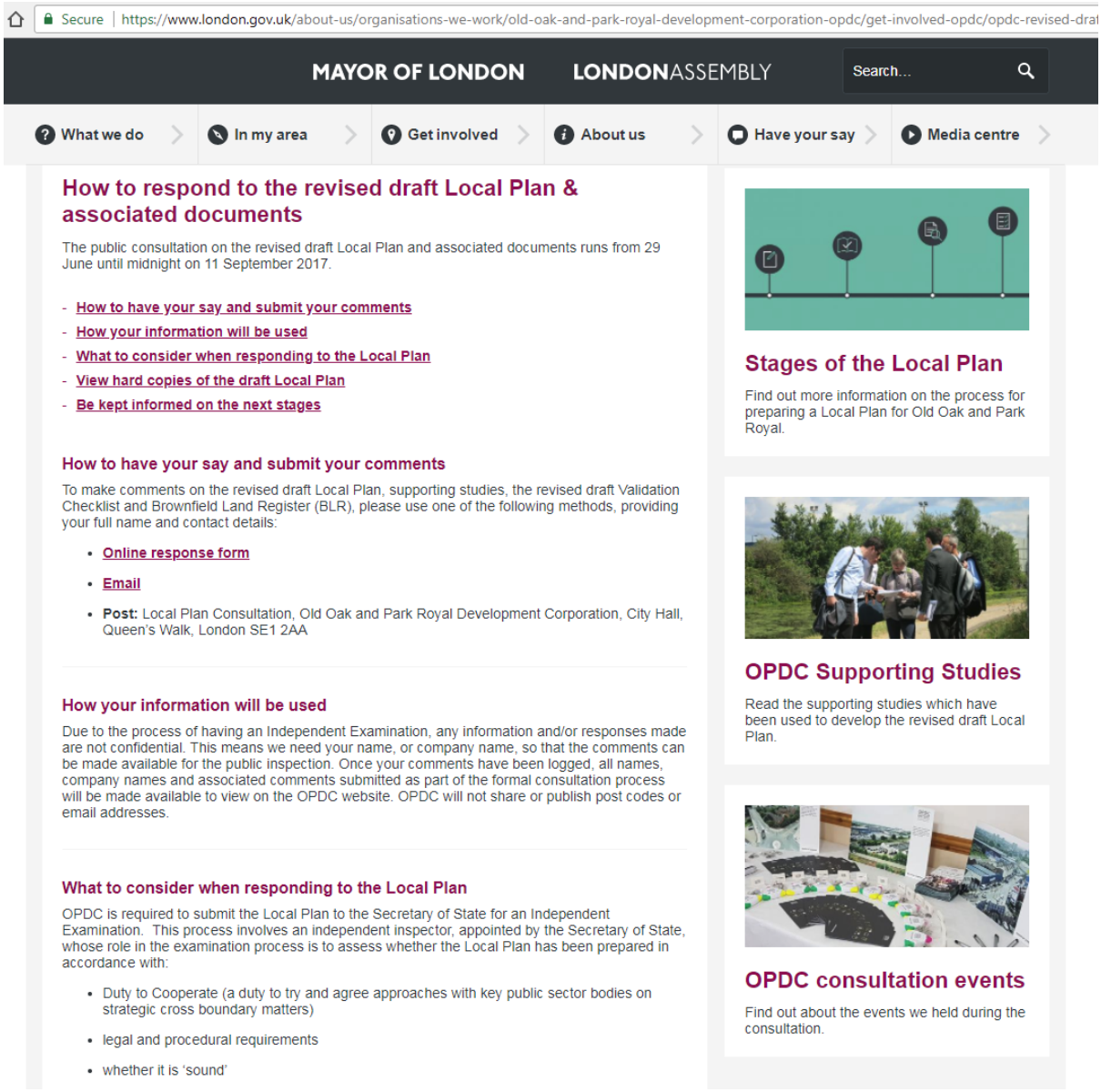
3.3 Copies of emails, letters, leaflets and social media engagements inviting representations on the revised draft Local Plan are included in Appendix H.

Figure 4: Boundary of Letter Drop Area



3.4 A new section of the OPDC website was created specifically for the Regulation 19 consultation. This provided an overview of the purpose of the consultation, including the NPPF tests of soundness, outlined how responses to the consultation should be submitted, and provided details of consultation events being held in the area. Consultation documents, including the Revised Draft Local Plan, Policies Map, Statement of Consultation, Key Performance Indicators and all 53 supporting study documents, were published via this platform for the public to view.

Figure 5: Regulation 19(1) Local Plan Consultation Pages on OPDCs Website

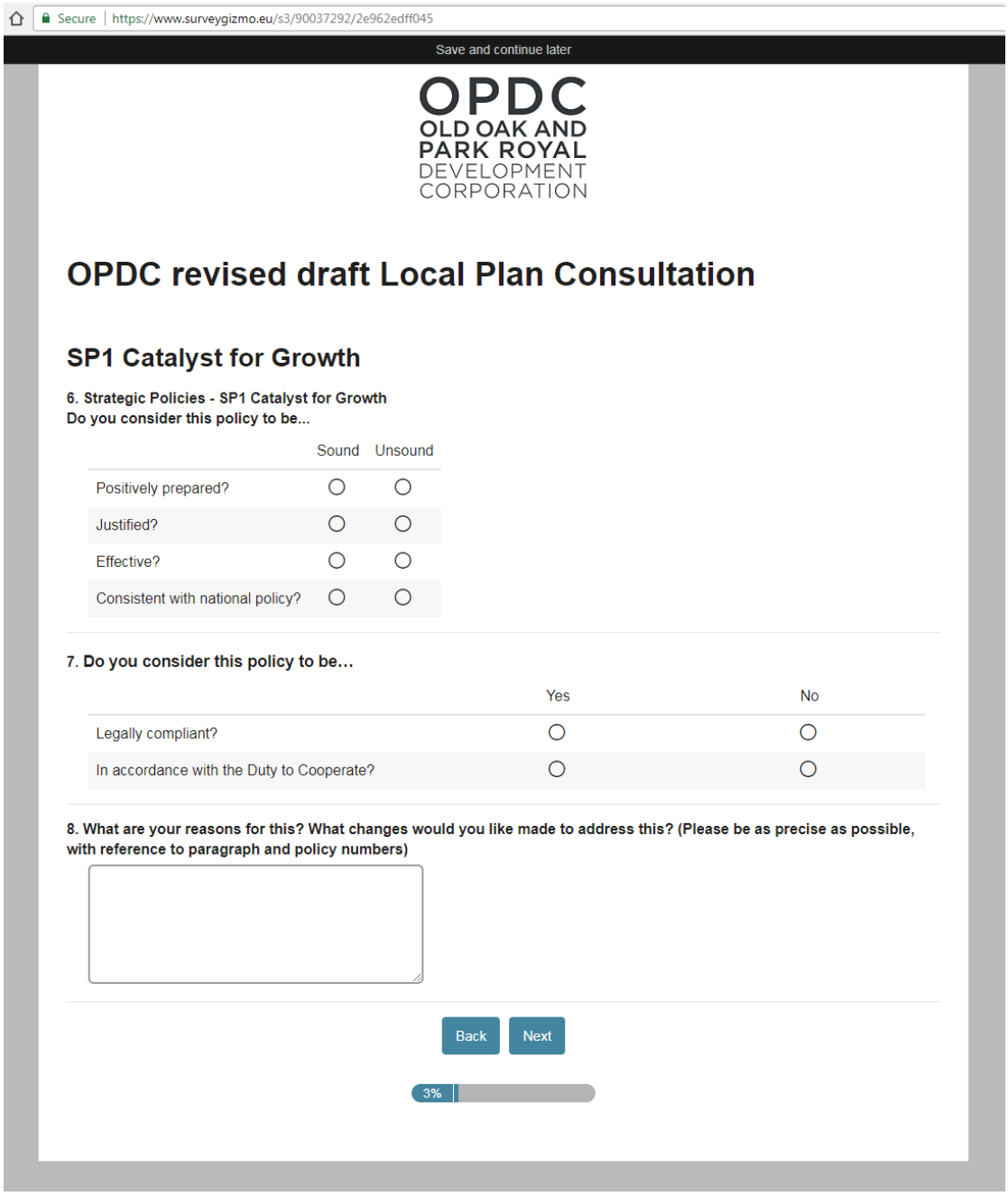


3.5 Hardcopies of all consultation documents were also made available at the following locations:

- Brent Civic Centre;
- Ealing Council Offices;
- Hammersmith Town Hall;
- Harlesden Library;
- The CoClub, North Acton; and
- City Hall.

3.6 Reponses to the consultation could be submitted via email, post, and the dedicated online response form set up via the SurveyGizmo platform.

Figure 6: Online Response Form



3.7 Where requested, and where OPDC considered it justified, an extension of time was granted for stakeholders to submit responses following the 11th September 2017 deadline. Requests were considered on a case by case basis, and were generally viewed positively considering the summer period in which consultation was held and the difficulty for certain stakeholders to coordinate responses.

Consultation Activities

3.8 The following consultation activities were undertaken throughout the eleven-week consultation period:

- Seven drop-in events were held in and around the OPDC area. These events allowed members of the public to drop in and view all consultation materials and speak with the Local Plan team.
- Six of these drop-in events were followed by presentations on selected Local Plan focus areas. These focus areas were publicised in advance so that members of the public could attend events of particular interest to them; and
- Two live Twitter sessions held on 18 July and 5 September 2017.

Table 4: Details of drop-in and presentation events

Date	Time	Venue	Local Plan Focus
05/07/2017	18:00 – 20:30	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG	Spatial vision and place policies
10/07/2017	18:00 – 20:30	City Mission 2 Scrubs Lane NW10 6RB	Housing policies
15/07/2017	10:00 – 14:00	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG	N/A – Drop in session only
19/07/2017	18:00 – 20:30	The Collective Old Oak Lane NW10 6FF	Social infrastructure and open space policies
20/07/2017	18:00 – 20:30	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG	Employment and town centre policies
24/07/2017	18:00 – 20:30	City Mission 2 Scrubs Lane NW10 6RB	Transport policies
26/07/2017	18:00 – 20:30	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG	Design and environment policies

Level of Response

3.9 The Local Plan resulted in 119 responses submitted via email, letter and on-line survey, which included 2,880 individual comments.

- A total of **98 responses** were received via email and letter;
- **21 responses** were received via the online survey platform;
- OPDC received and responded to **14 tweets** relating to the Local Plan across the consultation period.
- Drop-in and presentation events were well attended, with an average of **19 attendees** per event.

Summary of Key Response Themes

3.10 The consultation response resulted in over **2,800 total individual responses**. Having assessed each individual response, OPDC has **identified 1,754 issue summaries** arising from these responses. Appendix F outlines each of the issues, and clarifies whether or not this has resulted in a change in the Regulation 19 Draft Local Plan.

3.11 Given the large number of issues raised, OPDC has identified a list of 40 main Issues. The key issues summary is included in Appendix E, and highlights which respondents raised the issue and what actions (if any) OPDC have undertaken to address the issue.

Table 5 Key Issues Subject Themes

Main issues	Summary
Strategic policies	Disagree that the Local Plan should set out which are and which are not strategic policies. Particularly disagree with the place policies as being strategic policies
Community-led Vision and Objectives	The alternative Community-led Vision and Objectives suggested by the Hammersmith Society is still relevant.
Improving health and reducing health inequalities	The Local Plan should include further policy detail about the various factors that contribute to good health and what impacts negatively on health.
Densities	The densities proposed in the Local Plan exceed established guidelines. The Plan is therefore unsound.
Building heights	Insufficient justification for tall buildings and demonstration that this will deliver lifetime neighbourhoods has been provided. The Plan does not provide enough clarity on future building heights, locations of tall buildings or definitions of tall buildings. A map of tall building locations should be provided. Indicative building heights of 40 storeys + are not justified. Density information in DCS is not reflected in the Local Plan This does not conform with London Plan policy 7.7 or NPPF para 58 and 59.
Place policies	The policies are too detailed and should instead be replaced by area action plans and neighbourhood plans.
HS2 Station capacity	Development capacity proposed on the HS2 station and surrounds is not justified. This level of development would not be supported by enabling works currently proposed by HS2. Suggest that policies are drafted more flexibly to allow for a range of development scenarios.
Elizabeth Line Depot	Development of the Elizabeth Line Depot and Train Maintenance Depot should be delayed beyond the plan period

Old Oak North Densities	Without a commitment to the delivery of Hythe Road Station, the densities in Old Oak North are unjustified resulting in the policy being ineffective.
Elizabeth Line spur	The Elizabeth Line rail spur has not been proved feasible or financially viable, and is not safeguarded by appropriate bodies. Safeguarding of the line has major impacts on the developability of the site, and clarify is required on its feasibility.
Willesden Junction	The proposed links from Willesden Junction Station in the diagram for P11 will not assist in improving connection between Old Oak and Harlesden, and does not reflect Brent's ambition that the Station presents strong frontage to station road.
Wormwood Scrubs	Evidence should be provided for the need for any routes and enhancements to the Scrubs.
Engagement with local people	The policy is not effective. Further clarity required for setting out different options and proactive community engagement. It should refer to the need for engagement with local people, via neighbourhood forums, as early as possible in the design process.
Access to public realm	Need to be clearer about the need for public realm to be genuinely public.
Fire resilience (Tall Buildings)	OPDC needs to reconsider its approach to tall buildings in light of the Grenfell Tower tragedy including considering fire risk and associated costs.
Development capacity and resultant building heights	Heights are driven by untested London Plan development capacities. This is demonstrated by tall buildings planned along Scrubs Lane. Rationale is not justified.
Designated heritage assets	D8 should provide policy for how designated heritage assets will be considered rather than defer to the NPPF and national guidance. This will ensure accordance with NPPF paragraphs 9, 12 and 126.
Air quality	There is a concern that the air quality policy is weak and ineffective As London Borough of Hammersmith & Fulham is an Air Quality Management Area under the 1995 Environment Act – Part IV, impacts of any development must be agreed with the Council.
Fire Resilience (Sustainable Materials)	Consultees supported policy EU8 (sustainable materials) but were concerned that the impacts of fire safety following the Grenfell tragedy should be reflected in the policy.
Strengthen Green Space Factor	Green Infrastructure and Open Space Strategy and Management Plan should adopt clearer strategy around Green Space Factor and Green Points system implementation.
Light pollution	Policy should consider impact of light pollution
London Cycle Design Standards	On network planning issues comments were made that there was insufficient explanation of how the LCDS would be applied.

Parking restrictions	There is a need to recognise the parking needs of businesses and industry and parking restrictions may not be appropriate to apply to this activity.
Affordable housing target and tenure	Developers have challenged whether the target is feasible given the need to fund infrastructure and the challenging local constraints on sites (i.e. contamination). The councils and community groups have also challenged the deliverability of the target, but also consider that the tenure split should require a greater proportion of LAR housing, to align with the need identified in OPDC's Strategic Housing Market Assessment for over 80% LAR.
Family housing	Developers suggest the target will be challenging to achieve at high densities. Community groups also recognise the challenge of achieving the target at high densities, but want the target increased to 50% family housing to meet needs identified in OPDC's Strategic Housing Market Assessment.
Gypsy and Traveller Accommodation	OPDC should assess the capacity to provide pitches to meet Gypsy and Traveller Accommodation need.
Industrial intensification:	Requests for OPDC to be clearer about support for industrial intensification to ensure that Park Royal SIL can support the attainment of jobs targets.
Affordable workspace	Requests for Local Plan to make a strong commitment and provide further detail on affordable workspace.
Business relocations	Community groups have expressed concerns about the impacts on jobs and business losses. There are requests for further clarity and detail on how business relocations would be managed and some questioning the requirements for this.
Waste sites	Existing waste facilities, particularly Powerday, negatively impact on residential uses and should not remain in the area.
Further land should be de-designated from Strategic Industrial Location	Request for additional sites/areas to be released from SIL or allowed to be to be developed for mixed-uses.
Impact Assessment	The threshold of 5,000sqm for Impact Assessments within Old Oak Major town Centre should be reconsidered and revised down to the NPPF 2,500sqm threshold.
Pubs	The policy is overly restrictive and repeats policies covered elsewhere or includes too specific or onerous policy requirements. Conversely, a number of stakeholders supported the current policy and strong protection of pubs.
Social infrastructure	Requests for the policy to be strengthened with regard to protection of existing uses and support for new uses. Comments were also raised on the methodology and assumptions within the Education and Health Needs Study
Sports facilities and playing fields	Amendments to the policy were suggested to give stronger protection to existing facilities, to align

	more closely to the NPPF and for playing fields to be appropriately addressed in the policy.
Town centre uses and A-Class uses:	Suggestions that the policies for town centre uses (TCC1) and A-class uses (TCC3) should be amended to ensure strands relating to town centre uses are all covered within TCC1 and that the policy ensures significant adverse impacts to surrounding centres are appropriately mitigated and to ensure that town centre uses within SIL are being appropriately managed.
Cumulative Impacts	The policy should be revised to state that development proposals should not have an unacceptable impact, either by themselves of cumulatively with other developments, upon existing town centres
Balancing priorities	Need to recognise site specific constraints and constraints affecting development feasibility and viability and other 'non infrastructure' planning obligations when considering the implementation of the Local Plan.
Viability	There is no clear approach to addressing the funding gap and the implementation of the Local Plan is therefore compromised. Concerns have also been raised about the viability of delivering the affordable housing and employment policies.
Community Engagement	Policy DI3 is not sound because OPDC has not upheld its Statement of Community Involvement (SCI), appropriately engaged with community groups and did not designate the Old Oak Neighbourhood Area as submitted.

4 ON-GOING CONSULTATION

Duty to Cooperate

4.1 As part of the Duty to Cooperate (DtC) process, the OPDC holds a regular series of Project Team meetings to provide updates on emerging planning matters within the OPDC area. The meetings are attended by planning officers from the OPDC, the London Boroughs of Hammersmith and Fulham, Ealing, Brent (whose boundaries falls within the OPDC area) and Kensington and Chelsea (boundary adjacent to OPDC Area), the Greater London Authority (GLA) and Transport for London (TfL). In accordance with the Duty to Cooperate, OPDC has been working closely with these authorities and bodies in the ongoing development of the Local Plan. Feedback received from DtC partners played a key role in the production of both the Local Plan.

PLACE Review Group

4.2 OPDC's PLACE Review Group provides strategic advice on proposed development and policy at Old Oak and Park Royal. In preparing the Local Plan, OPDC has presented emerging policies to the PLACE Review Group to seek input and advice.

Update events

4.3 To help to keep the public informed of the development of the Local Plan between the formal Local Plan consultations the following events were held:

- An event was held on 22 November 2016, at the Co-Club in North Acton, allowing OPDC officers to provide an overview of the outcomes of the Regulation 18 consultation and update on the progression of the next draft of the Local Plan.
- In advance of the first Regulation 19 consultation, a pre-consultation even was held on 26 April 2017 providing an overview of the work undertaken in preparing the draft Regulation 19 Local Plan, and the purpose of a Regulation 19 Local Plan consultation.
- Following review of all response to the first Regulation 19 consultation, an event was held on 8 February 2018 at All Souls Church, Harlesden. This allowed OPDC offices to brief members of the public on the key issues raised as part of the consultation, likely changes to made to the Local Plan because of these issues, and the programme for the next stages of the Local Plan.

4.4 These events, which was open to members of the public, allowed OPDC officers to provide an overview of the outcomes of the consultations and update on the progression of the next drafts of the Local Plan.

Regulation 19(2) Local Plan Consultation

4.5 Following the close of the first Regulation 19 consultation, amendments have been made to the revised draft Local Plan in light of consultation responses, updated and new supporting studies, the Draft New London Plan and changes to national planning guidance.

4.6 Due to these changes OPDC is carrying out a second Regulation 19 consultation. Responses should be focused on the amendments set out in the second Regulation 19 revised draft Local Plan and the new and updated supporting studies. This consultation period will take place from 14 June until the 31 July 2018, in line with the requirements set out in the Town and Country Planning (Local Planning) (England) Regulation 2012 and the OPDC Statement of Community Involvement.

4.7 Comments made on the first Regulation 19 consultation continue to be valid and will be submitted to the Secretary of State along with responses to this second Regulation 19 consultation.

4.8 In advance of the consultation, all consultees listed within the Local Plan contact database will be contacted by email and/or letter announcing the consultation, and providing details of how the second revised draft Local Plan may be viewed and how to provide responses. The second revised draft Local Plan and all supporting studies will be readily available through the OPDC's website, and hardcopies will be available at public facilities in the Local area. Social media will continue to play a key role in publicising the consultation.

4.9 A pre consultation event is being held on the 24th May at All Souls Church in Harlesden. The event will be open to members of the public and to allow OPDC officers to outline the work undertaken in preparing the second revised draft Regulation 19 Local Plan, and the purpose of a second Regulation 19 Local Plan Consultation.

Appendix A

Regulation 18 Summary of Main Issues Raised and Officer Response

1. Introduction

	Who raised the issue	What the issue is	Response
1	Royal Borough of Kensington and Chelsea	**Kensal Canalside:** OPDC should be more explicit about supporting links between it and the Kensal Canalside Opportunity Area and recognise the role that a Crossrail station at Kensal Canalside would have in achieving both the Mayor's and the Council's ambitions for this area.	Change proposed. Reference to connections to Kensal Canalside was included in the Regulation 18 draft and continues to be in the Regulation 19 draft. The supporting text to Policy SP1 and the Local Plan appendix recognise that the Royal Borough of Kensington and Chelsea are lobbying the Mayor of London and TfL for a new Crossrail station at Kensal, which could further increase the area's development capacity
2	2 local residents	**Contextual analysis:** The Local Plan should provide more details about the areas context and its surroundings, including its communities	Change proposed. OPDC agrees that the document would benefit from more detail on the area's context. The Regulation 19 draft of the Local Plan includes a more detailed context section within the appendix, that sets out further details on the area's neighbourhoods, history, key features and facilities.
3	HS2 Ltd	**HS2 Bill/Act:** HS2 Ltd stated that there should be a distinction made between environmental controls generally and those that apply to HS2- the latter governed by the bill process.	Change proposed. The introduction will be amended to clarify that there will be a separate Act that governs certain aspects of the HS2 proposals.
4	Brent Council	**Benefits to existing communities:** The Introduction should be clearer about how local communities can benefit from regeneration at Old Oak, through access to new services, affordable housing and supply chain opportunities.	Change proposed. Policy SP1 and the Local Plan appendix make it more explicit that existing communities are set to benefit from the new services, housing and employment opportunities that arise from the regeneration of the Old Oak and Park Royal area. A new section has also been added to the introduction, setting out the main opportunities and challenges for the regeneration of the area.

2. Vision and Objectives

	Who raised the issue	What the issue is	What we're doing to address this issue
5	Hammersmith and Fulham Disability Forum, Hammersmith and Fulham Historic Buildings Group, The Hammersmith Society, Midland Terrace Residents' Group, Dioceses of London, Harlesden Neighbourhood Forum, Grand Union Alliance, Old Oak Interim Forum, Brent Council and 19 residents	**Recognising communities:** The Spatial Vision, Objectives and Mission Statement should refer to existing and future local communities including the need to ensure their protection, integration with Old Oak and that they benefit from the regeneration.	Change proposed. The spatial vision has been updated and includes two narratives 'thinking big' and 'going local'. The 'going local' narrative recognises the benefits that the redevelopment and regeneration of the area will bring to local communities and businesses. This includes, inter alia, improving life chances and fairness, enhancing day to day quality of life, generating benefits from development for local people, providing a mix of homes at different affordabilities, supporting local economies, creating an attractive local environment, conserving and enhancing environmental and heritage assets and ensuring development connects to local communities and neighbourhoods.
6	Grand Union Alliance	**Grand Union Alliance proposed vision:** The Spatial Vision should be based on the Grand Union Alliance's community based vision (see end of appendix).	Change proposed. The spatial vision has been updated to take on board elements of the Grand Union Alliance spatial vision, along with suggested alterations from other stakeholders.
7	The Hammersmith Society	**Further detail:** The Spatial Vision and Objectives should include information for each of the policy themes in a similar manner to the Old Oak and Park Royal Opportunity Area Planning Framework.	Change proposed. The spatial vision now more closely ties into the strategic polices. Rather than having objectives, for the Regulation 19 Local Plan, the strategic policies provide the objectives associated with the spatial vision. However, the spatial vision is high level and succinct and does not repeat all the policy detail in the strategic policies.

8	20 local residents and QPR (NQP Development Services)	**Sports stadium:** The Spatial Vision and Objectives should support the delivery of a stadium to act as a community hub and catalyst for wider development.	Change proposed. The spatial vision does not directly reference the potential for a stadium, but identifies the area as a home to a diverse and intense mix of uses. The vision narratives expand on this and identify that the area will become a destination for people from across London and the UK that will be home to a mix of cultural and leisure uses. Policy SP6 (Places and Destinations) supports the potential for catalyst uses in the area, which includes sports stadia. Policy TCC8 sets out the detailed criteria against which catalyst uses would be assessed.
9	Midland Terrace Residents' Group, Old Oak Interim Forum	**Protecting SIL:** Objective 1 should be more flexible in protecting Park Royal as an industrial area to help deliver sustainable communities	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities.
10	GLA, Hammersmith and Fulham Disability Forum, 1 local resident	**Accessibility and inclusivity:** The Spatial Vision, Objectives and Mission Statement should make specific reference to accessibility and inclusivity.	Change proposed. The spatial vision narratives now reference the importance of regeneration showcasing high quality design as part of new development that will set new international standards in accessible and inclusive high density commercial, industrial and residential development and open space design and management.

3. Overarching Spatial Policies

	Who raised the issue	**What the issue is**	**What we're doing to address the issue**

11	London sustainable Development Commission, 2 local residents	**Environmental sustainability:** The overarching spatial policies do not currently adequately convey OPDC's role as being an exemplar for environmentally sustainable development.	Change proposed. The Regulation 19 Local Plan has been revised to more clearly draw out the importance of environmental sustainability. Policy SP2 (Good Growth), requires that proposals support the delivery of the spatial vision by establishing high standards for sustainable development at appropriately high densities, by delivering a low carbon and environmentally resilient development, that is adaptive to and resilient to climate change.
12	Hammersmith and Fulham Council, Ealing Council, TITRA, Diocese of London, Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, the Hammersmith Society, Wells House Road Resident's Association, London Sustainable Development Commission, MP for Hammersmith, 4 local residents	**Homes and jobs targets:** Question the homes and jobs targets in the Local Plan. Some consultees consider that the figures should be higher, whereas others suggest that the figures should be lower. Request that further work should be undertaken to assess whether the London Plan targets are appropriate and provide justification for why the densities proposed within the Development Capacity Study are appropriate	No change proposed. The OPDC Local Plan is required to be general conformity with the London Plan and the minimum housing targets for Old Oak and Park Royal. Further work has been undertaken as part of OPDC's Development Capacity Study to test the appropriateness of housing targets in the Local Plan. The Development Capacity Study has been undertaken in accordance with national policy guidance. The Development Capacity Study work has informed the revised targets in the Regulation 19 draft Local Plan. The acceptability of any specific development proposal would be judged against the policies in the Local Plan, which includes policies which ensure that design is of a high quality and is in accordance with the principles of sustainable development.
13	3 local residents	**Homes vs Jobs:** Too many jobs are proposed and not enough homes	No change proposed. There is a need for the OPDC Local Plan to be in general conformity with the London Plan, which identifies the need to deliver a minimum 25,500 homes and 65,000 jobs in the OPDC area. OPDC considers that the homes and jobs figures to strike the right balance between the

			need for homes and jobs in the area. The level of transport access and the sites' location make Old Oak and Park Royal an excellent future employment location. This will help London's global competitiveness. This mix of employment and homes will also help create a mixed community. Employment provision is being further tested through OPDC's Future Growth Sectors Study, which will inform the next draft Local Plan.
14	Brent Council, Old Oak Park (DP9), Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, Diocese of London, Old Oak Park (DP9), TITRA, London Sustainable Development Commission, 2 local residents	**Meanwhile Uses:** There was support for requiring developers to submit a meanwhile strategy, but that the Local Plan should set a threshold for the size of schemes required to submit one	Change proposed. The revised Local Plan (policy TCC9) requires a meanwhile feasibility studies to be submitted by major development proposals (10 or more residential units or 1000sqm+ of non-residential floorspace). If meanwhile uses are feasible, then the policy requires the submission of a meanwhile strategy.
15	Diocese of London, Old Oak Park (DP9), The Hammersmith Society, TITRA, Wells House Road Resident's Association, Midland Terrace Resident's Group, Old Oak Interim Forum, 9 local residents	**New Places:** Suggestions for the Local Plan to include new places including: - A separate place for Willesden Junction station; - A separate place for Victoria Road/Old Oak Lane - Splitting Park Royal into two places - Identifying Harlesden Town Centre as a separate place - A separate place for Old Oak Common station	Change proposed. OPDC recognises the need to have a more nuanced approach to Places. OPDC agrees with the suggestion to have a separate place for Willesden Junction. This has been included in the Regulation 19 draft (P11) OPDC agrees with the rationale to have a separate place drawing together the communities along Old Oak Lane, Old Oak Common Lane and part of Victoria Road. This has been identified as a separate place in the Regulation 19 draft (P8)

		- A separate place for the IEP depot	OPDC recognises the diversity within Park Royal industrial area and officers have undertaken further evidence work, which is considering the spatial characteristics of this area. OPDC has produced a Heritage Strategy, which identifies heritage assets and ways in which these can help shape the future of Old Oak and Park Royal. OPDC has also produced a Future Growth Sectors Study to gather further information on the nature of the local economy and future opportunities. This has resulted in a more nuanced approach in Park Royal, which has now been split into two places – Park Royal West (P4) for the newer more logistics/storage orientated part of the estate, and Old Park Royal (P5) for the older part of the estate where industrial uses are finer grain and more mixed. Harlesden Town Centre is not within the OPDC area, so OPDC is unable to set a place policy for it; however, OPDC is working closely with Brent Council and the Harlesden Neighbourhood Forum to consider how development at Old Oak and Harlesden can complement each other. OPDC recognises the need for more detailed policy guidance for Old Oak Common station and to address this, the station has been identified as a 'cluster'. OPDC does not propose to include a separate place for the IEP depot. Whilst the future redevelopment of the IEP depot site for a mixed use development may be supported in land use policy terms, given the nature of the existing use as the depot, it is not identified as a phase likely to come forward within the timescales of the Local Plan.
16	Midland Terrace Resident's Group, Old Oak Interim Forum,	**Release more industrial land:** Stakeholders suggested that OPDC should look to release more strategic industrial	No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities

	TITRA, Wells House Road Resident's Association, 6 local residents	land in Park Royal (particularly on the HS2 work sites and at Willesden bus garage) for housing in order to allow for lower densities in Old Oak and to ensure that industrial uses' impacts on existing residential areas are minimised. Stakeholders also suggested that OPDC should take a less fixed, more blurred approach to land use zonings, allowing residential uses in industrial areas and vice versa	this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Officers consider that taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. Officers support the potential for a mix of land uses in Old Oak and this is already reflected within the draft Local Plan's strategic policies.
17	General support: Old Oak Interim Forum, Old Oak Park (DP9), The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group, 6 residents, 1 local business Oppose a sports stadium: Midland Terrace Resident's	**Catalyst uses:** General support for catalyst uses in the area, with a number of suggestions for types of catalyst uses that could be supported and the criteria that could be applied for assessing applications. Opposition and support for a proposed sports stadium in the area. Opposition focussed on a sports stadium's significant infrastructure requirements and its impact on amenity. Support focussed on a sports	Noted. The Local Plan supports the potential for catalyst uses in the area, in Policy SP6. The Local Plan now includes a criteria based policy (TCC8) to assess the acceptability of different catalyst uses. This approach will ensure that for any future catalyst use to be appropriate it will be assessed against a range of policy requirements. This policy will be supported by evidence from a Catalyst Uses Study.

	Group, Old Oak Interim Forum, Old Oak Park (DP9), Grand Union Alliance, 1 local resident (in opposition) Support a sports stadium: QPR, 7 local residents, 2 local businesses and 2,185 standard QPR supporter responses	stadium's ability to support placemaking and potentially justify higher densities.	
18	Brent Council	**Delivering open space:** The policy should provide a stronger commitment to delivering open space.	Change proposed. The revised Local Plan is supported by an Environmental Standards Study. This is informing more detailed requirements for open space in Local Plan, which are set out in Policy SP8 (Green Infrastructure and Open Space), the place policies (chapter 4), Policy EU1 (open space) and EU2 (Urban Greening and Biodiversity). This includes the requirement to deliver 30% public open space as part of development proposals outside of SIL and the delivery of 3 new local parks (2ha+) in Old Oak
19	Friends of Wormwood Scrubs, Grand Union Alliance, Local resident.	**Existing open space as amenity space:** Wormwood Scrubs and Kensal Green Cemetery should not be considered in calculations for amenity space provision from new development.	Noted. It will be important to ensure that new development provides sufficient open space and urban greening to meet the needs of its new residents and workers. The requirements for this are set out in Policies SP8, EU1 and EU2. However, OPDC considers that the Local Plan should also acknowledge that Wormwood Scrubs is a significant asset that with improved access, can be a space that people living and working around the Scrubs can use and benefit from, in accordance with the 1879 Wormwood Scrubs Act.

20	Queen's Park Rangers FC, Greater London Authority, Brent Council, London Sustainable Development Commission, 3 local residents.	**Connecting communities:** The policy should define how existing communities will be connected to each other and to open spaces.	Change proposed. OPDC has developed a Public Realm, Walking and Cycling Strategy which is informing the Regulation 19 Local Plan and which shows how the OPDC area should be connected into its surroundings. The Local Plan is also supported by an Environmental Standards Study, which sets OPDC's standards for open space, which have been incorporated into Policy SP8 (Green Infrastructure and Open Space), the place policies (chapter 4), Policy EU1 (open space) and EU2 (Urban Greening and Biodiversity). Policy SP8 requires that delivers and/or contribute towards a varied, well-designed, integrated and high quality green infrastructure and open space networks which successfully integrate with the wider green infrastructure and open space networks, including the Grand Union Canal, Wormwood Scrubs and All London Green Grid
21	Aurora Developments Ltd, Boropex Holdings Limited, City and Docklands Property Group, Diageo Plc, Old Oak Park, NQP Development Services, Westkite Ltd	**Implement density and height policies flexibly:** Land owners supported high density development with some asking for the policy to be delivered flexibly including being supportive of delivering higher densities and tall buildings in sensitive locations.	No change proposed. The Local Plan has been updated to take a more nuanced approach to densities rather than setting overarching density ranges as per the Regulation 18 draft. The overarching approach to densities and building heights is set out in Policy SP9 (Built Environment), which identifies the area as being appropriate for high densities and tall buildings but that development proposals must also respond appropriately to sensitive locations. The places chapter provides place specific guidance on minimum homes and jobs targets, informed by OPDC's Development Capacity Study and where appropriate, provides policy guidance on appropriate building heights and locations for tall buildings.
22	Brent Council, Friends of Wormwood Scrubs, Midland Terrace Residents' Group, Old	**Density and building heights concerns:** Public bodies, community groups and local residents raised concerns of high densities and tall buildings. They asked for the	Noted. OPDC is committed to developing an exemplarily designed built environment and the Local Plan has been updated to contain more detailed policies ensuring that

	Oak Interim Forum, The Hammersmith Society, 7 local residents	delivery of low rise high density development that aligns with the London Plan density matrix.	development delivers high quality design and high standards of sustainability. To ensure the Local Plan meets the London Plan housing and employment targets for the area, development will generally be a mix of medium and high densities and height. This recognises the area's designation as Opportunity Areas. Policy SP9 recognises the need for development to appropriately respond to sensitive locations. In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF.
23	Friends of Wormwood Scrubs, MP for Hammersmith, local resident, Hammersmith and Fulham Historic Buildings Group, Midland Terrace Residents' Group, Harlesden Neighbourhood Forum, Old Oak Interim Forum, Grand Union Alliance, Wells House Road Residents Association, Ealing Council, Inland	**Managing impact on sensitive locations:** The importance of managing the impact of building heights on sensitive locations was highlighted. Specifically where sensitive edges for lower density forms of development are located directly adjacent to high or highest density forms of development. Other suggestions included delivering lower densities and building heights so they do not impact on North Acton, St. Mary's and Kensal Green cemeteries, the Grand Union Canal and existing residential areas.	Noted. The OPDC area will include new tall buildings. OPDC is mindful of the need to manage the transition from the high density development in Old Oak to surrounding areas, while optimising densities to deliver housing and employment targets. Policy SP9 requires that development responds appropriately to sensitive locations. The cemeteries have all been identified as sensitive locations. As a major transport interchange with the highest public transport accessibility in the OPDC area, the area around the Old Oak Common Station is considered to be appropriate for higher densities and taller buildings in accordance with the London Plan. Tall buildings will also be appropriate at locations near to the proposed Hythe Road Station; however, consideration would need to be given to the setting of the

	Waterways Association, 15 local residents	Some stakeholders suggested that buildings heights should be lower around the Old Oak Common station to mitigate impacts on Wormwood Scrubs and that the focus for tall buildings should instead be around Hythe Road station.	existing St. Mary's Cemetery, the Grade 1 listed Kensal Green Cemetery and proposed Cumberland Park Factory conservation areas. Any proposal for a tall building would be considered against Local Plan policies dealing with environmental issues such as amenity (D6), air quality (EU4) and any tall building proposals would also be considered against OPDC's tall buildings policy (D5).

4. Places

	Who raised the issue	**What the issue is**	**What we're doing to address the issue**
24	Environment Agency, Old Oak Park (DP9)	**Environmental policy:** Should incorporate recommendations from environmental strategies and policies into place policies	Change proposed. The revised Local Plan incorporates spatial environmental policy recommendations in the Places chapter.
25	Hammersmith and Fulham Historic Buildings Group, Diocese of London, 5 local residents Midland Terrace Resident's Group, Old Oak Interim Forum, 2 local residents	**Neighbourhoods:** Some stakeholders supported the provision of more detailed guidance on finer grain neighbourhoods in the Local Plan. Whereas others objected to this level of detail, stating that it was too premature	Noted. It is recognised that a blanket approach to identifying neighbourhoods would be inappropriate, particularly where development is unlikely to come forward within the short/medium term. Flexibility needs to be maintained. In addition to places, the revised Local Plan includes 'clusters' policies. These sit within each place and include more detailed policy guidance for key locations, such as at the meeting of movement routes, destination uses, or places of interest/heritage.
26	2 residents, Diocese of London, Osbourne Investments Ltd (Boden House) (Savills), the	**Strategic Sites:** As with neighbourhoods, some stakeholders supported the identification of strategic sites providing a clearer policy	Change proposed. The revised draft Local Plan includes site allocations. Site allocations enable OPDC to clearly demonstrate to an inspector that its short term housing supply sites are deliverable and/or developable can meet supply

	Inland Waterways Commission Old Oak Park, Old Oak Interim Forum	direction for specific parts of the OPDC area. Whereas others objected, again stating that it is too premature to provide this level of detail.	targets. Details on the criteria for selecting site allocations has been set out in the introduction to the places chapter (chapter 4).

4. Places – P1 Old Oak South

	Who raised the issue	What the issue is	What we're doing to address the issue
27	Diocese of London, Midland Terrace Resident's Group, Old Oak Interim forum, Hammersmith and Fulham Historic Buildings Group, TITRA, 2 local residents 2 local residents	**Nature Reserve:** Support for keeping the nature reserve in its current location. Some suggested it could be relocated but the Plan would need to ensure that areas of biodiversity and wilderness and maintained in Old Oak South	Noted. The starting point for the nature reserve would be to seek to retain and upgrade it as a key amenity and biodiversity space. However, it is recognised that there are essential and large infrastructure requirements in and around the nature reserve. As their detailed design is progressed, it may be more appropriate to relocate the space elsewhere within the scheme. Any relocation of the open space would need to be undertaken in accordance with Policies EU1 (open space) and EU2 (urban greening and biodiversity).
28	Friends of Wormwood Scrubs, Old Oak Interim Forum, TITRA	**Impact on Wormwood Scrubs:** Challenge need for access to Wormwood Scrubs, especially 24 hour access from the Old Oak Common station. Concern about impact of development in Old Oak South being visible from Wormwood Scrubs	Noted. The principle of access from north, south, east and west is important to create a fully integrated part of London and is supported by OPDC, the GLA and is in accordance with the Wormwood Scrubs Act, 1879. Any scheme would require the approval of OPDC Board and the Wormwood Scrubs Charitable Trust. As a major transport interchange with the highest public transport accessibility in the OPDC area, the area around the

			Old Oak Common Station to the north of the Great Western Main Line is considered to be appropriate for higher densities and taller buildings in accordance with the London Plan. However, any proposals coming forward would need to be considered in terms of their impact on key heritage assets and open spaces, including Wormwood Scrubs in accordance with policies SP9 (Built Environment) and D5 (Tall Buildings)
29	Midland Terrace Resident's Group, Old Oak Interim Forum	**Protection for existing residential areas:** Should incorporate stronger wording in the policies to minimise impacts on existing residential enclaves such as Wells House Road	Noted. The Local Plan identifies residential enclaves as sensitive locations and requires development (SP9) to respond appropriately to their setting. Policy SP9 also requires proposals to respond to local character and context.
30	Hammersmith and Fulham Historic Buildings Group, 3 local residents	**Old Oak Common station design:** Concerns raised about the design quality of the HS2 station and that OPDC needs to set policies that ensure exemplary architecture and seamless connections	Change proposed. The revised Local Plan includes a 'cluster' policy P1C1 for Old Oak Common station, requiring the station to be a state of the art, exceptionally designed, 21st century multi-modal transport interchange, that should become a destination at the heart of a new major town centre and commercial hub for London, seamlessly integrating into its surroundings.

4. Places – P2 Old Oak North

	Who raised the issue	What the issue is	What we're doing to address the issue
31	Brent Council, Ealing Council,, Harlesden Neighbourhood Forum, 4 local residents	**Willesden Junction OSD and connectivity:** Should more clearly support the potential for over-station development around Willesden Junction station and over the West Coast Main Line	Change proposed. The Willesden Junction Station Feasibility Study has explored the potential for over-station and over track development. This work has informed the Willesden Junction place policy (P11), which identifies appropriate locations where development may be feasible on tracks or on and around the station.
32	Brent Council, Harlesden Neighbourhood Forum,	**Willesden Junction Connectivity and West Coast Main Line bridge:**	Change proposed. OPDC's Willesden Junction Station Feasibility Study and Public Realm, Walking and Cycling

	QPR (NQP Development Services), 1 local resident	Need to ensure that improvements to Willesden Junction station ensure that there are high quality connections delivered to Harlesden, particularly to the east. The new bridge over the West Coast Main Line should be vehicular and incorporate a bus route.	Strategy have further explored the potential for connecting from Willesden Junction to the east to Harlesden and also to the west. This work shows how these connections can be feasibly delivered to a sufficiently high quality and the need for these connections to be secured has been embedded within the Willesden Junction place policy (P11) in the Local Plan and is included in OPDC's Infrastructure Delivery Plan (IDP). The Willesden Junction place policy supports the delivery of new and improvement connections across rail lines which would include the West Coast Main Line bridge as part of Old Oak High Street. The policy for Old Oak High Street (SP7), requires the street to be designed for pedestrians and cyclists and where feasible, buses and other vehicles.
33	Brent Council, Hammersmith and Fulham Council, Hammersmith and Fulham Historic Buildings Group, 3 local residents Midland Terrace Resident's Group, Old Oak Interim Forum, 2 local residents Old Oak Park (DP9)	**Open space:** Some stakeholders supported the open space provision in Old Oak North being provided as one large space, stating that it would allow for a wider range of recreational and sporting activities Other stakeholders supported the provision of a series of linked smaller spaces, as this would enable more doorstep access to open space, whilst still providing for a wide variety of functions One consultee felt it best to maintain flexibility and allow proposals to either	Change proposed. The Old Oak North place policy (P2) requires the delivery of a new minimum 2 ha local park in Old Oak North, to provide for a variety of leisure and recreation functions. The need for this space is evidenced in OPDC's Environmental Standards Study. The policy for Old Oak North also requires development in Old Oak North to contribute to the delivery of the Grand Union Canal local park, also of a minimum of 2ha, with the remainder of the park being provided by development coming forward in Old Oak South. Policy SP8 (Green Infrastructure and Open Space) and EU1 (open space) require that development delivers 30% of the developable area as public open space and that in addition to

		provide the open space as one large space of a series of linked spaces	local parks, provision should be made of smaller open spaces and green streets.
34	Brent Council, Diocese of London, Old Oak Park (DP9), Hammersmith and Fulham Historic Buildings Group, 5 local residents	**Canal-side walkways:** There was unanimous support for the provision of a continuous walkway along the northern edge of the Grand Union Canal in Old Oak North	Noted. OPDC proposes to continue to support the provision of the continuous walkway on the northern side of the Grand Union Canal in Old Oak North.
35	Old Oak Interim Forum, 4 local residents	**Artist Studios:** Should ensure that existing artist studios in the area are protected and incorporated into the development	Change proposed. Policy E1 requires that proposals should seek to retain or re-provide existing employment uses within suitable on-site premises. The potential retention of artist studios through the redevelopment of Old Oak North has been referenced in the supporting text to the place policy (P2).
36	Brent Council, Canal and River Trust, Hammersmith and Fulham Historic Buildings Group, Diocese of London, Historic England, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	**Rolls Royce Building:** There was support for the building's local listing by a wide variety of stakeholders.	Change proposed. The Old Oak North place policy (P2) requires development to conserve and enhance the proposed locally listed Rolls Royce Building. OPDC plans to consult on and agree the Local List alongside the progression of the Local Plan to its adoption.
37	Hammersmith and Fulham Historic Buildings Group, Brent Council, Canal and River Trust, Hammersmith and	**Local Heritage List:** Other buildings were suggested for local listing, including loading bay units in Salter Street, old industrial buildings fronting onto the Grand Union Canal, the electricity tower by the	Change proposed. OPDC has considered all comments and suggestions for buildings to be locally listed. Buildings that OPDC propose to locally list are identified in OPDC's Heritage Strategy. OPDC plans to consult on and agree the Local List alongside the progression of the Local Plan to its adoption.

	Fulham Historic Buildings Group, Diocese of London, Historic England, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	railway and some of the artists' studio buildings	
38	Ealing Council	**West London Line Viaduct:** Should identify the potential for the railway embankment in Old Oak North to be converted to a viaduct	Change proposed. The Local Plan's Old Oak North place policy (P2) identifies a preference for the existing Hythe Road embankment to be raised onto a viaduct, if proven to be feasible.

4. Places – P3 Old Oak High Street

Please refer to '9. Town Centre Uses' below.

4. Places – P4 Grand Union Canal

	Who raised the issue	**What the issue is**	**What we're doing to address this issue**
39	Canal & River Trust, Diocese of London, local residents, The Hammersmith Society, 6 local residents	**Additional uses for the canal:** The policy should include supporting additional potential to uses the canal to provide heating and cooling of surrounding development and commercial, leisure and educational moorings.	Change proposed. The potential to use the canal for heating and cooling was investigated as part of OPDC's Utility Study. This shows that the Canal could potentially provide between 1-3MW of heat, which has been agreed with the Canal and River Trust. The requirement to consider the potential for heat extraction and use of cooling from the Grand Union Canal is referenced in the Grand Union Canal place policy (P3). The place policy also promotes the use of the canal for leisure and commercial uses and for moorings.
40	Midland Terrace Residents Group, Old	**New waterspaces:** Delivering policy proposals for smaller water spaces at the	Change proposed. The Local Plan supports the provision of new water spaces as part of the green infrastructure network.

	Oak Interim Forum, The Inland Waterways Association, TITRA, 5 local residents, 1 local community representative	area north of Atlas Roundabout by the canal and at Mitre bridge were supported.	Specifically, the Grand Union Canal place policy supports the delivery of additional water spaces along the canal and the policy for Old Oak High Street in the Connecting People and Places policy (SP7) supports the delivery of new spaces along this street. Policy SP8 (Green Infrastructure and open space) supports water spaces within the green infrastructure network.
41	Supported: 3 local residents Opposed: Midland Terrace Residents Group, Old Oak Interim Forum, The Inland Waterways Association, 1 local resident, Hammersmith and Fulham Historic Buildings Group.	**Densities along the canal:** A mix of local residents and community groups provided support and objections for delivering higher densities than those proposed in the Local Plan.	Noted. The canal is a Conservation Area. The revised Local Plan Grand Union Canal policy (P3) provides more detailed policy guidance for appropriate building heights along the canal, which aims to ensure that building heights appropriately respond to this sensitive location. This has been informed by the Grand Union Canal Massing and Enclosure Statement.

4. Places – P5 Park Royal

42	Brent Council, Ealing Council, Diageo Plc, Midland Terrace Resident's Group, SEGRO, 8 local residents	**Park Royal infrastructure:** Concerned about current infrastructure capacity, particularly in terms of traffic congestion. Comments suggest a number of opportunities to improve Park Royal, including public realm, transport, new shops/restaurants, active/mixed use streets, additional open space and community infrastructure provision.	Change proposed. The Local Plan is supported by more detailed evidence work identifying the infrastructure needs in Park Royal. This includes the Public Realm, Walking and Cycling Strategy and Park Royal Transport Strategy. The place policies (P4-6) have been appropriately updated to identify these requirements. Details about infrastructure, including its cost (where known) and potential sources of funding, are identified in the Infrastructure Delivery Plan (IDP).

		There needs to be further clarity and information on the delivery strategy for improvements to Park Royal setting out the costs, how these will be funded and that these will be front loaded. Concerns are raised about the effectiveness of these.	In respect of retail and restaurants, the Local Plan proposes the designation of the Park Royal Neighbourhood Town Centre and also identifies the potential for small-scale town centre uses in the Brewery cluster, to the south-west of Park Royal West. Publicly open/civic spaces are also supported in both Park Royal Centre (P6) and Brewery cluster (P4C1).
43	Brent Council; Ealing Council; local resident	**Park Royal boundary:** Mixed views on the Park Royal Place boundary. Some comments noted spatial variations in the character of Park Royal, and there was a suggestion that these should be used as a basis for identifying distinct, smaller places and specific policies. This was countered by another comment which supported a single place approach.	Change proposed. OPDC recognises the diversity within Park Royal industrial area and officers have undertaken further evidence work, which is considering the spatial characteristics of this area. OPDC has produced a Heritage Strategy, which identifies heritage assets and ways in which these can help shape the future of Old Oak and Park Royal. OPDC has also produced a Future Growth Sectors Study to gather further information on the nature of the local economy and future opportunities. This has resulted in a more nuanced approach in Park Royal, which has now been split into two places – Park Royal West (P4) and Old Park Royal (P5) The places are further supported by 'clusters' where more detailed policy is required for specific locations within places.
44	Brent Council, Ealing Council, SEGRO, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, 2 local residents	**Access to local services:** Differing views on the approach to improving access to local services. The majority of stakeholders supported a central hub at Park Royal Centre, but they also considered that town centre uses should be more distributed.	Noted. The priority is to protect the industrial uses and ensure future town centre development does not undermine their ability to function successfully. OPDC continues to propose that town centre uses in Park Royal are focussed in Park Royal Centre (P6). A cluster has been identified in Park Royal West (Brewery), which has also been identified as a potential location for small-scale town centre uses. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and

			do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.

4. Places – P6 Park Royal Centre

45	Harlesden Neighbourhood Forum, 1 local resident	**Quantum of retail floorspace:** Concerns raised that the quantum of retail floorspace in Park Royal will impact on high streets in surrounding centres, such as Harlesden town centre.	Change proposed. The Retail and Leisure Needs Study has been updated to include the new Atlas Junction Neighbourhood Centre suggested through other representations and by consequence, the A-class floorspace identified for Park Royal Centre has reduced from 5,000sqm to 3,000sqm. However, regardless of this, the Retail and Leisure Needs Study showed an additional 5,000sqm of A-class floorspace would have a negligible impact on the surrounding town centre hierarchy.
46	Goodies Foods Ltd, Brent Council, Midland Terrace Resident's Group, Old Oak Interim Forum, 2 local residents	**SIL expansion**: It was alleged that SIL expansion was not appropriate as it was not justified by evidence; however, there is also support for these changes provided there was a buffer around residential areas.	Change proposed in part. The part of Site E3.19 within the identified Park Royal Centre boundary will not be taken forward for SIL designation. It is noted that this already includes existing town centre uses and there is ongoing demand for town centre uses in Park Royal Centre so existing retail floorspace needs to be supported to remain. The other proposed SIL expansion sites are still proposed for SIL designation. No changes are proposed to other proposed SIL designations. OPDC's draft Industrial Land Review provided sufficient evidence and rationale for the proposed SIL boundaries.
47	Brent Council	**Park Royal Centre boundary:** Plan needs to clarify whether Middlesex hospital is in or out of the Park Royal Neighbourhood Centre boundary	Change proposed. OPDC is proposing to include Central Middlesex Hospital within the town centre boundary as it is a major non SIL use and could help to complement and support the function of the town centre. The draft the Local Plan includes a Policies Map, which identifies the boundary for the centre.

48	Brent Council, Goodies Food Ltd, Ealing Council, local residents (x2)	**Residential uses within Park Royal Centre:** Some stakeholders considered that residential uses should be allowed within the Park Royal Centre boundary as it is a town centre use. Other views expressed the need to be more explicit in restricting new housing.	Change proposed. The Local Plan identifies the potential for new homes within Park Royal Centre, but that housing should appropriately mitigate any environmental impacts from surrounding SIL uses.
49	Brent Council, 2 local residents	**Social/community uses:** Comments received identified a need for a range of additional social/community uses within Park Royal Centre to support residents and workers.	Change proposed. Modelling undertaken as part of OPDC's Education and Health Study has identified the need for an increase in the size of the health centre at Central Middlesex Hospital, to meet the health needs of early development phases. However, the infrastructure modelling work in the Education and Health Study and Development Infrastructure Funding Study has not identified the need for any other public social/community uses in Park Royal Centre. Proposals for private facilities would be supported, where they accord with the requirements set out in Policy TCC4 (social infrastructure).
50	Ealing Council, Goodies Food Ltd	**Designation of Park Royal Centre:** One stakeholder supported the designation of Park Royal Centre. Another suggested that Park Royal Centre should be designated as Strategic Industrial Location and not as a neighbourhood centre.	No change proposed. Park Royal Centre is already designated as a town centre in Ealing's Local Plan and there are a number of town centres related uses clustered here. There is additional demand for town centre uses in the area arising from the projected additional homes and jobs envisaged in the Park Royal Centre and surrounding industrial estate. It is in the interests of proper planning that a centre is identified to provide for this growth in a sequential manner. The uses that would be encouraged to this centre would be those that support the functioning of the surrounding industrial estate.
51	Ealing Council	**Conflict between SIL and retail uses** - Retail uses should not be allowed on SIL land within the town centre boundary.	Change proposed. The boundary of the town centre has been redrawn so that there is no longer a conflict between the SIL and town centre boundaries.

4. Places – P7 North Acton

	Who raised the issue	What the issue is	What we're doing to address the issue
52	Diocese of London, Midland Terrace Resident's Group, Old Oak Interim Forum, Wells House Road Resident's Association, Diocese of London, Imperial College London, Ealing Council, 16 local residents	**Student housing**: Respondents considered that North Acton has an overconcentration of student housing. There was support for a broader/ balanced mix of housing and restrictions on additional rental products. The alternative view was there are already appropriate safeguards to protect conventional housing in H10 so a restrictive approach is not necessary.	No change proposed. The Local Plan supports a mix of housing types, including student housing. Student housing meets important housing needs in London, given the areas prevalence of universities and other higher education institutions. Any proposal for student housing would need to be considered against Policy H10, which seeks to ensure it contributes to the vibrancy and diversity of an area, especially in the early phases of the plan period, is located in areas with high PTAL or is easily accessible by non-motorised forms of transport, does not undermine the delivery of conventional self-contained housing supply and housing targets and does not result in overconcentration in any one specific location. All proposals would also need to be accompanied by a Residential Management Plan.
53	Midland Terrace Resident's Group, WARA, 1 local resident	**Place making:** Respondents are disappointed with the way North Acton has been developed, with concerns raised about overdevelopment, building heights, the quality of development and the lack of community infrastructure. They would like to see a creation of real community and more successful Place.	Noted. The Local Plan is taking a place making approach and sets out a clear vision, and policy objectives to help achieve holistic and positive change. The Local Plan is informed by the Victoria Road and Old Oak Lane Development Principles document, which looked at parts of North Acton and recommendations from this study have been embedded in the North Acton and Acton Wells place policy.
54	Wells House Road Resident's Association, 2 local residents	**Retail provision:** There needs to be more diversity in the range/quality of shops	Noted. The revised Local Plan supports this approach by identifying the potential to create a neighbourhood centre and improve upon the existing range and quality of provision. The Local Plan also seeks to restrict an overconcentration of certain uses (such as betting and payday loan shops and takeaways) to support vibrancy and vitality.

55	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, Wells House Road Resident's Association, WARA	**Scheme of Delegation:** Would like to see planning decisions in North Acton to be taken by the OPDC	No change proposed. The agreed Scheme of Delegation states that the determination of planning applications in North Acton will be delegated to Ealing Council to determine. Ealing Council are keen to ensure they continue to take a leading role in delivery of the regeneration of North Acton and OPDC is not proposing to amend this arrangement. As the draft OPDC Local Plan progresses through its development it will continue to gain weight as a material consideration in the determination of all planning applications, including those determined by Ealing Council in North Acton. OPDC and Ealing Council planning officers are continuing to liaise on a regular basis to ensure emerging OPDC Local Plan policies are used to inform planning decisions as the Local Plan gathers legal weight.
56	Wells House Road Resident's Association, WARA, 3 local residents	**Infrastructure capacity:** Adequate infrastructure should be provided as there are concerns about existing healthcare and school capacity. Developments in North Acton should be contributing more towards this provision.	Change proposed. OPDC has undertaken a Study which has identified the needs for education and health facilities across the OPDC area, including in North Acton. This recommends expanding off-site facilities in the early phases and delivery new on-site education and health facilities to meet the needs of development in the medium to long term. The required on-site facilities are identified in the supporting text to policy TCC4 and where relevant in the places chapter.
57	5 local residents	**Quality of the environment:** Area, particularly Horn Lane, is heavily polluted and not suitable for residential development. There is a suggestion that it should be commercially focussed instead and the policy should consider environmental factors/impact.	Noted. Horn Lane is outside of the OPDC area. Within the OPDC area, OPDC's Environmental Standards Study and Air Quality Study have set benchmarks for environmental sustainability, which will look to reduce pollution at source and if not feasible, make recommendations for appropriate mitigation in order to ensure that development in Old Oak and Park Royal delivers high standards of health and well-being. These recommendations have been embedded into the Local Plan.

58	Grand Union Alliance, 3 local residents	**Green space:** There is a need for more green space in North Acton. It is not clear in the Plan whether existing open space will be protected and what the approach is towards greenspace, landscaping/tree planting.	Change proposed. The Local Plan policy EU1 looks to protect existing open spaces, unless it is re-provided with at least an equivalent quantum and quality. Policy SP8 and EU1 also requires the provision of new open space, including requiring 30% of the developable area outside of SIL being provided as public open space. Policy EU2 supports high quality urban greening and the delivery of a diverse range of ecology.
59	Midland Terrace Resident's Group, Old Oak Interim Forum, Grand Union Alliance, 1 local resident	**Traffic movements:** Request for further clarity on how issues with current traffic movements will be addressed i.e. traffic calming, existing gyratory, junction options.	Change proposed. The Regulation 18 Local Plan was supported by the Old Oak Strategic Transport Modelling Study, which identified required infrastructure to address traffic problems arising from the development in the area. This has been further supplemented by the Public Realm, Walking and Cycling Strategy and the Victoria Road/Old Oak Lane Development Framework. Recommendations from these studies have been embedded in the revised Local Plan and infrastructure has been included in the Infrastructure Delivery Plan (IDP).

4. Places – P8 Scrubs Lane

	Who raised the issue	**What the issue is**	**What we're doing to address this issue**
60	Aurora Developments Ltd, NQP Development Services, Westkite Ltd.	**Density and development capacity:** Land owners supported high density development and tall buildings with the 2,600 new homes development capacity figure requested to be identified as a minimum.	Noted. OPDC has developed a Scrubs Lane Development Principles document. This provides more information on the development capacity of Scrubs Lane and the recommendations from this have been incorporated into the revised draft Local Plan, specifically in Policy P10. Homes targets in the places are expressed as minimum figures.
61	Historic England, Midland Terrace Residents' Group, Old	**Building heights and heritage:** Public bodies, community groups and local residents raised concerns of high densities and tall buildings in relation to the impact	No change proposed. OPDC has developed a Scrubs Lane Development Principles document, which will provide further detail for the location of tall buildings along Scrubs Lane, the development capacity of sites and appropriate locations for tall

	Oak Interim Forum, TITRA	on designated and proposed heritage assets. These concerns included the need to deliver evidence base to support the provision of tall buildings along Scrubs Lane and the need for flexibility in meeting local housing and jobs targets	buildings. The recommendations from this study have been embedded in the revised Local Plan, specifically in Policy P10.
62	2 local residents.	**Mitre Bridge Industrial Estate:** Requests were made for further information on the proposals for Mitre Bridge Industrial Estate and how the impacts on Little Wormwood Scrubs and St. Mary's Cemetery would be mitigated.	Change proposed. The Scrubs Lane Development Principles document provides further guidance for this area and high level recommendations have been embedded in the revised Local Plan. OPDC also plan to produce a Supplementary Planning Document for Scrubs Lane, which would include the Mitre Bridge Industrial Estate. The SPD would provide more detailed policy guidance for this location.

4. Places – P9 Old Oak West

	Who raised the issue	What the issue is	What we're doing to address the issue
63	Ealing Council, local resident, TITRA	**Levels of traffic and pollution:** There are concerns about the levels of traffic and pollution on Old Oak Lane and a request for proposals to make every effort to limit traffic growth, divert lorries and mitigate the effect on the pedestrian environment. It is noted that the Policy does not have a criteria which addresses this.	Change proposed. OPDC are intended to implement stringent car parking levels within for new developments in Old Oak to mitigate impacts on Old Oak Lane. The Victoria Road and Old Oak Lane Development Principles document has considered measures to mitigate impacts of traffic on Old Oak Lane and these recommendations have been incorporated into the revised Local Plan. The Air Quality Study identified Old Oak Lane as an air quality focus area. Comments on the air quality have been fed through to the consultants leading on the study, who have made further alterations to the study. The place policy for Old Oak Lane and Old Oak Common Lane requires development to support amenity and health and well-being by ensuring development mitigates the impacts of noise and air pollution generated by Old Oak Sidings waste facility, SIL uses on the Harlesden Bus Depot site and construction activities including associated vehicle movement and contributing to

			and/or delivering measures that help support OPDC, the boroughs and where relevant TfL, to address air quality issues along Victoria Road and Old Oak Lane including street greening.
64	Raban Management Ltd, Hammersmith and Fulham Historic Buildings Group, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, Wells House Road Resident's Association, 15 residents	**Land uses:** There was some support for the approach to Old Oak West, with general consensus that Industrial Business Park uses were more appropriate than heavier industrial uses. Other respondents favoured more mixed or alternative uses to allow a buffer between the industrial and other sensitive uses, including the potential for housing.	No change proposed. National guidance and London Plan policy requires the protection of employment land when there is a clear demand for these uses. OPDC's draft Industrial Land Review provides evidence of demand and officers propose that Old Oak West continues to be identified as SIL. However, policies require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses.
65	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, 3 local residents	**Land use:** Objections raised in relation to proposed siting of the freight consolidation centre. Key concerns are raised over traffic impacts, long term uncertainty regarding the use and sensitivity of heritage assets in this area.	Change proposed. OPDC are not proposing to identify a specific site for a freight consolidation centre in Old Oak West. Work to date has shown that a consolidation centre in this location would attract more traffic to the area and is therefore not an appropriate location for a consolidation centre. The Local Plan continues to support the sustainable transport of freight in this location, by supporting the functioning of the Euroline Freight Terminal and the Grand Union Canal.
66	Raban Management Ltd	**Sites should be excluded:** There are existing residential uses within Old Oak West which should not be included in the HS2 construction sites/ SIL designation.	Change proposed. The existing residential units on Goodhall Street have been removed from SIL.
67	Historic England, Midland Terrace Resident's Group, TITRA, 3 local residents	**Sensitive areas:** Development should be sensitive to the proximity of heritage assets and improve this relationship by creating a green buffer and there should be early engagement with local groups.	Change proposed. Policy P9 requires development to be sensitive to local character by conserving and enhancing the Grand Union Canal Conservation Area, the proposed locally listed Plantagenet House and the adjacent Old Oak Lane Conservation Area

4. Places – P10 Wormwood Scrubs

	Who raised the issue	What the issue is	What we're doing to address the issue
68	Friends of Wormwood Scrubs, 2 local residents	**Embankment:** The embankment to the north-west should be retained as this is essential to delivering agreed ecological enhancements.	Noted. The Local Plan is not proposing the redevelopment of the IEP depot during the lifetime of the Plan. The Local Plan is not directly proposing the removal of the embankment; however, were ecology on the embankment to be affected by a proposal, OPDC would require development to provide an equivalent or greater amount of biodiversity on-site or provide a financial contribution to facilitate off-site enhancements in lieu of provision, in accordance with Policy EU2.
69	Friends of Wormwood Scrubs, Hammersmith and Fulham Council, Hammersmith and Fulham Historic Buildings Group, Midland Terrace Resident's Group, Old Oak Interim Forum, Andy Slaughter MP, Old Oak Park (DP9), 19 local residents	**Access to Wormwood Scrubs:** Providing access/routes into the Scrubs is broadly supported but it must be sensitive to the character of, and minimise impacts to, the Scrubs. Concern with/opposition to direct access from the new station into the Scrubs as it could impact on the ecology of the site. An alternative access point is suggested towards the east/north east, or the use of existing routes.	No change proposed. The Wormwood Scrubs Act (1879) states that Wormwood Scrubs should be held "upon trust for the perpetual use thereof of the inhabitants of the metropolis for exercise and recreation". Providing access to the Scrubs for the new residents, employees and visitors within Old Oak accords with the Act; however, any access would need to be sensitively designed to minimise its impact on the ecological value of the Scrubs and would need full agreement from the Wormwood Scrubs Charitable Trust.
70	Friends of Wormwood Scrubs, The Hammersmith Society, 22 local residents	**Surface water drainage:** Existing issues with surface water drainage were highlighted. It is considered that measures to address surface water flooding should be consistent with the agreed ecological enhancement programme. There is some support for a pond/drainage in certain locations but also concerns and objections expressed about ongoing management/maintenance.	Noted. The Local Plan continues to support climate change resilience by delivering SuDS which address current surface water flooding issues on the Scrubs and which can potentially contribute to a strategic SuDS network. This position is informed by the Integrated Water Management Strategy, a supporting study to the Local Plan.

71	Friends of Wormwood Scrubs	**Ecological enhancements:** Any ecological enhancements should be sensitive to the character of the Scrubs and should be decided by the Trust. A number of proposals are put forward for ecological enhancements/objectives and key locations where these could take place. Need to recognise the various designations of ecological protection – Site of Borough Grade 1 importance for Nature Conservation and the Local Nature Reserve.	Change proposed. Policy P12 sets out OPDC's commitment to agree any proposals with the Wormwood Scrubs Charitable Trust. The ecological protections in Wormwood Scrubs are referenced in the supporting text. Proposals would need to accord with Policy EU2, which seeks to conserve and enhance biodiversity.
72	Friends of Wormwood Scrubs, Andy Slaughter, Old Oak Interim Forum, The Hammersmith Society, TITRA, 13 local residents	**Retaining character:** Retaining/protecting character of Wormwood Scrubs is the biggest priority. Impacts of increased usage should be considered.	Noted. OPDC agrees that it is important to maintain the character of the Scrubs but considers that there may be parts of the Scrubs that will experience increased usage as a result on development and that these locations may require an alternative landscaping approach. OPDC carried out a Wormwood Scrubs survey which is helping to identify potential future sensitive enhancements to the Scrubs.

5. Sustainable Development

	Who raised the issue	What the issue is	What we're doing to address this issue
73	London Sustainable Development Commission	**Define outcomes:** The policy should highlight the potential intended outcomes and likely activities which would characterise a smart and sustainable area.	Noted. The sustainable development policy has been removed and its requirements have been included in the delivery and implementation policy. The policy requirements in relation to delivering a smart and sustainable area are set out in the Plan's strategic policies and throughout the place polices and development management policies. Smart technology is specifically dealt with in Policy EU11.

6. Design

	Who raised the issue	What the issue is	What we're doing to address this issue
74	Hammersmith and Fulham Disability Forum, GLA	**Accessibility and inclusivity:** The Local Plan does not sufficiently demonstrate to developers why proposals should be accessible and inclusive. Policy D8 should reinforce London Plan policy. OPDC should establish a Strategic Access Panel and/or invite local access groups to review major planning applications.	Noted. The Local Plan is being drafted to ensure conformity with London Plan policy 7.2 'An inclusive environment'. As part of OPDC's development plan this policy, alongside the Accessible London SPG and relevant guidance in the Housing SPG, will be utilised to determine planning applications. To ensure detailed consideration of access matters are considered in proposals, the OPDC Place Review Group has specific expert representation in accessible and inclusive design. The spatial vision references the importance of creating an accessible and inclusive development. This is further asserted in Policy SP9 (Built Environment) and in Policy D3 (Accessible and Inclusive Design)
75	Wells House Road Residents Association, 1 local resident	**Design experience:** OPDC Planning Committee should consider including members with a design background.	Noted. The make-up of the Planning Committee is determined by OPDC Board.
76	Brent Council, The Hammersmith Society, 1 local resident.	**Management of open space:** Policies D2 and D3 should set out how it is considering the long term management of open spaces and public realm in light of local council resources.	Noted. Policy SP8, EU1 and EU2 set out the importance of securing appropriate management and maintenance arrangements for open space. The Local Plan does not specify the exact arrangements as there would need to be detailed consideration of the most appropriate management arrangements on a case by case basis.
77	Brent Council, Diocese of London, Grand Union Alliance, The	**Amount and types of open space:** Policy D3 should specific quantum and range of open space needed to meet the needs of	Change proposed. Policy EU1 (which supersedes D3) identifies that outside of Strategic Industrial Location (SIL), development should look to deliver a minimum 30% of the

	Hammersmith Society, Hammersmith and Fulham Historic Buildings Group, 4 local residents	the new community. Open spaces should provide a range of roles including for attractions, social gatherings, biodiversity/nature, community events, street markets and quiet places.	area as publicly accessible open space. The policy sets out that this should be delivered through local parks in locations identified in the places chapter, smaller open spaces, green streets and where it is not possible or desirable to deliver 30%, a contribution in lieu would be sought.
78	Hammersmith and Fulham Historic Buildings Group, 12 local residents	**Local context:** Policy D4 should set out that development should reflect existing local context.	No change proposed. Policy SP9 requires development to respond to local character and context but 'reflecting' local context would be inappropriate, especially given the area's identification as opportunity areas and potential as set out in the London Plan, for the area to deliver high densities and tall buildings.
79	Grand Union Alliance, Midland Terrace Residents Group, Old Oak Interim Forum, Wells House Road Residents Association, Hammersmith and Fulham Historic Buildings Group, 1 local resident	**Local list:** Support for the development of a local list was provided.	Change proposed. OPDC's proposed locally listed buildings are set out in the Heritage Strategy. OPDC plans to consult on and agree the Local List alongside the progression of the Local Plan to its adoption.
80	Brent Council	**Local list suggestions:** The Grand Junction Arms public house, Stonebridge Station, Willesden Junction Station and 308-310 Elveden Road were suggested to be locally listed.	Noted. These suggestions were used to inform the Heritage Strategy. OPDC plans to consult on and agree the Local List alongside the progression of the Local Plan to its adoption.
81	Brent Council, The Hammersmith Society	**Conservation area:** A new conservation area was suggested for the length of the Grand Union Canal in Brent.	Noted. This suggestion has been incorporated into OPDC's Heritage Strategy and OPDC plans to consult on the potential for a Conservation Area in this location later in 2017.

82	Brent Council, Diocese of London, Historic England, Midland Terrace Residents Group, Old Oak Interim Forum, The Hammersmith Society, Local resident, Hammersmith and Fulham Historic Buildings Group	**Conservation area:** The designation of the proposed Cumberland Park Factory Conservation Area was supported.	Noted. Cumberland Park Factory Conservation Area was designated in February 2017.
83	Diocese of London, Midland Terrace Resident's Group, Old Oak Interim Forum	**Residential amenity:** In response to questions D7a, allowing a greater impact on residential amenity to facilitate high density development was opposed.	No change proposed. OPDC has continued the preferred policy approach of recognising the importance of amenity considerations. Policy D6 sets out OPDC's proposed approach to amenity.

7. Housing

	Who raised the issue	**What the issue is**	**What we're doing to address the issue**
84	Brent Council; Home Builders Federation; GLA, Grand Union Alliance; Midland Terrace Residents Group; 5 local residents	**Housing supply:** Some stakeholders wanted the Local Plan to be clearer that new housing would be to serve the needs of local residents whereas other stakeholders asserted that the Old Oak would be meeting a wider London-wide strategic need for housing and that the Local Plan should state this more clearly.	Noted. OPDC recognises its dual role in meeting locally arising housing need and providing additional supply to meet London-wide needs. The supporting text to Policy H1 identifies that the scale of regeneration in the OPDC area means that OPDC can meet its objectively assessed need (OAN) for the OPDC area and can also make a significant contribution to the OAN for the three host boroughs and wider London sub-region.
85	City and Docklands Group; Diageo Plc; Diocese of London	**Micro-housing:** OPDC could allow some housing to not comply with London Plan space standards and Building Regulations	Change proposed. Policy H3 identifies that OPDC will expect sites to deliver 90% of units as Building Regulation M4(2) 'accessible and adaptable dwellings' and 10% of new housing

	Essential Living; Grand Union Alliance; Hammersmith & Fulham Disability Forum; Old Oak Park (DP9); 1 local resident	M4 (2) and M4 (3). These would be units providing less floor space than the one person space requirements; they would be supported in addition to studios. This might include "Co- Living": small apartments with shared living, entertaining and working space (e.g.: The Collective). In support, some respondents said that this can meet a specific housing need for students and young professionals and they can meet an affordable need for this group who would otherwise be house sharing in the PRS. Respondents who disagreed were primarily concerned about accessibility. Some respondents were prepared to see divergence from the space standards if it meant that more affordable homes were built.	as Building Regulation M4(3) 'wheelchair user dwellings' across all tenures, except where proposals are delivered in accordance with Policy H7 (Purpose built shared housing). The purpose built shared housing policy requires this form of housing, also known as 'co-living' housing to demonstrate that they contribute to the creation of mixed and balanced communities by not undermining the delivery of conventional self-contained housing supply, be located in appropriate locations that can absorb intensive usage, incorporate a high quality of design and shared space for occupants, provide a Residential Management Plan, and offer a commuted sum in lieu of the provision of on-site affordable housing
86	Brent Council; City and Docklands Group; Diageo Plc; Essential Living; Fizzy Living; GLA, Grand Union Alliance; Hammersmith & Fulham Disability Forum; Midland Terrace Residents Group; Old Oak Interim Forum; Old Oak Park (D9); 4 local residents	**Family-sized units:** The Local Plan sets requirements for family-sized housing (classed as 3 or more bedrooms) in the Affordable Housing and private market sector based on evidence in the SHMA; that the housing mix should include 53% 3 and 4 beds. Although there was a general acceptance that there is a clear need for more affordable family housing, some concern was raised in the consultation about the suitability of market family housing which	Change proposed. Residential schemes will be expected to deliver 25% family units across all tenures including a SHMA compliant mix for London Affordable Rent (Policy H3). This approach is a balance between actual delivery of family homes in London and the high need for family housing identified in the SHMA. It also reflects the fact that Old Oak will be a high density development and large units will have to be designed appropriately so that they are suitable for families with children (Policy H4).

		given house prices is unaffordable to local families and is often sold to investment buyers. Notwithstanding affordability issues there is evidence emerging from other London high density schemes that family-sized market housing ends up being occupied by PRS flat-sharers rather than families who would prefer to live in a low-density development with a private garden.	
87	Brent Council; Boropex Holdings Limited (Montagu Evans); Citrus Group & Greystar; City and Docklands Property Group; Diageo Plc; Essential Living; Fizzy Living; Fruition Properties (DP9); Grand Union Alliance; Harlesden Neighbourhood Forum; QPR (NQP Development Services); Raban Management Ltd and Raban Goodhall Ltd; The Hammersmith Society; Hammersmith & Fulham Council; Old Oak Interim Forum; Old	**Affordable housing (target):** The Local Plan included 4 options for setting a target for affordable housing. Having a viability tested percentage was the most preferred option with 9 respondents in support, followed by fixing the percentage (7 respondents), and negotiating on a site specific basis (3 respondents). No respondent agreed with the option to set a target based on different products. If OPDC proposes to fix the affordable housing target, respondents said that this would need to be reviewed to keep pace with supply and demand. There was also recognition that options could be amalgamated - i.e. OPDC could fix a percentage subject to viability. It is recognised in the responses that clarity, deliverability and viability are key	Change proposed. The revised Local Plan includes a 50% affordable housing target subject to viability. This is because as opportunity areas Old Oak and Park Royal can make a significant contribution towards London's affordable housing need. OPDC will follow the threshold approach set out in the Draft Affordable Housing & Viability SPG and work with the GLA and Approved Providers to use affordable housing grant to increase the level of affordable housing towards the 50% target. OPDC's Affordable Housing Viability Assessment shows a wide range of viability across the OPDC area. A fixed approach would have had to have been aligned to the least viable sites, meaning a fixed percentage approach would not have been an effective policy approach to maximise affordable housing provision or meet the Mayor's Housing and Viability SPG requirements.

	Oak Park (D9); 1 local resident	considerations in maximising the supply of Affordable Housing.	
88	Brent Council, Diocese of London, Grand Union Alliance, MP for Hammersmith, 5 local residents	**Rented affordable housing - London Living Rent:** There are different types of housing product, both to rent and to buy, aimed at different types of household. It is recognised in the responses that various needs can be met at Old Oak but there is a preference for housing that is genuinely affordable for working households on low to moderate incomes. Most of the respondents agree that OPDC should deliver as much affordable housing as possible. In addition to social and affordable rents, one of the products that will need to be delivered is the Mayor's London Living Rent which will set rent at 1/3 of gross household income.	Noted. The whole range of affordable housing products can be delivered, both for rent and for sale. The Local Plan supports the delivery of a range of housing types, sizes, tenures and affordabilities (SP4). Policy SP4 (thriving communities) requires schemes to support the attainment of an overarching 50% affordable housing target, measured in habitable rooms. Policy H2 sets out detailed criteria for affordable housing. This includes delivering 30% of affordable housing as London Affordable Rent and 70% as a range of Intermediate housing, including London Living Rent and London Shared Ownership. Policy H2 also requires that residential developments with the capacity to provide 10 or more self-contained units, should maximise affordable housing by applying the threshold and viability approach as set out in Mayoral guidance.
89	Diocese of London, Grand Union Alliance	**Starter Homes:** These are homes that are offered for sale at a minimum of 20% below the open market with a maximum cap of £450,000 in London. They are intended for first-time buyers under the age of 40 (with some exceptions). There are restrictions to ensure that Starter Homes are not resold or let at their open market value for 5 years following the initial sale. The government has set a target that 200,000 Starter Homes will be delivered by 2020.	Noted. The government published the Housing and Planning Act between the publication of the Regulation 18 and Regulation 19 Local Plans. The Housing and Planning Act clarifies the position regarding starter homes. The explanatory text in policy H2 makes reference to starter homes as a form of affordable home ownership housing. However, the Government has abandoned mandatory requirements to deliver 20% starter homes on every site. Rather, the Government intends to amend the NPPF to introduce a policy expectation that housing sites deliver a minimum of 10% affordable home ownership units. This may include a range of affordable home ownership products,

		Respondents were concerned about the impact of starter homes on the delivery of rented and shared ownership homes.	including: starter homes, shared ownership and discount market sales homes. This approach would align with the Mayor's draft Affordable Housing and Viability SPG and OPDC's affordable housing mix will exceed this. Key issues that need to be clarified in determining the final policy include how many Starter Homes OPDC will need to deliver and what impact this will have on the delivery of other types of affordable housing.
90	Ealing Council; Midland Terrance Resident Group; The Hammersmith Society; 2 local residents	**Existing Housing:** There is a concern from some respondents that existing housing will be demolished. They make the point that existing housing in the OPDC area should be optimised and retained, including bringing empty properties back into habitable use. Existing residents should not be displaced by the redevelopment.	Noted. Sites identified for development in the Development Capacity Study do not involve the demolition of any existing residential premises but there could be windfall sites that come forward with proposals to demolish a property. The policy requires that in this circumstance, applications should be resisted unless it is located within Strategic Industrial Location (SIL), the proposal would result in new housing being provided at an equivalent or higher density, measured by unit numbers and floorspace, or its loss is critical to unlock the comprehensive regeneration of the area.
91	Citrus Group & Greystar; City and Docklands Property Group; Essential Living; Fizzy Living;	**Build-to Rent (affordable housing contributions):** Concerns were raised that purpose-built Build to Rent generates lower yields than standard market housing but the value of the land is the same. This may put Build to Rent schemes at a disadvantage when compared to standard market schemes in competing for land. Any requirement on Build to Rent schemes to deliver Affordable Housing will have to be subject to viability.	No change proposed. OPDC proposes to continue to require Build to Rent schemes to provide a contribution of Affordable Housing, subject to viability. The policy clarifies that this should be in the form of intermediate housing. The policy also requires that purpose built Private Rented Sector (PRS) accommodation is under single ownership and management, subject to a covenant for at least 15 years and has appropriate clawback mechanisms in the event that units are sold out of the rented sector.

		Opinion is balanced on whether private rented housing should be provided in perpetuity or for fixed period of time.	
92	Brent Council; 3 local residents	**Build-to Rent (deposit saving options):** The proposal for deposit saving options to help tenants save a deposit would also have an impact on viability although it was supported by some respondents as a way to help people into homeownership.	No change proposed. The policy is not proposing to require deposit saving options, but proposals which include this would be supported, subject to other planning policies being satisfied and considerations of viability.
93	Brent Council; Citrus Group & Greystar; Diageo Plc, Grand Union Alliance, 3 local residents	**Build-to-Rent (as part of a mixed and balanced community):** Build to Rent has a part to play in a balanced community of mixed tenures. However, there are concerns around over-concentration in particular areas which can lead to a transient community.	No change proposed. OPDC supports the role that build to rent housing can play in meeting housing needs and supporting early place-making. Policy SP4 requires proposals to provide a range of housing tenures, types and sizes that deliver mixed and inclusive communities. Any proposals for build to rent would also need to submit a Residential Management Plan which would as a minimum include detailed information on: • move-in/out arrangements and how units are maintained during void periods; • how individual units will be managed; • how communal facilities, including landscaping, deliveries and collections will be managed; • security and fire safety procedures; and • procedures for community liaison.
94	Ealing Council; Hammersmith United Charities; The Hammersmith Society; 1 local resident	**Older people's housing:** There is a need for more housing for older people and people with support needs as part of a successful and balanced community.	Change proposed. The SHMA has been updated to identify the need for older people's housing, including sheltered housing, supported housing and extra-care. OPDC will support the delivery of specialist housing and development proposals providing 1,000 or more homes will be required to

			provide 10% of units as specialist care and supported needs housing for older people and/or vulnerable people.
95	Hammersmith & Fulham Disability Forum; 2 local residents	**Wheelchair housing**: Comments also were made about the need for wheelchair housing specifically, that this should be across tenures and that there is a risk that wheelchair users do not end up living in the wheelchair homes because the for sale units were not marketed as suitable for wheelchair users. Rented units will not be occupied by wheelchair users unless suitable tenants are identified early on.	No change proposed. OPDC continues to follow the London Plan on the 10% wheelchair accessible target across tenures. The supporting text to Policy H3 (housing mix) identifies that wheelchair units should be marketed as suitable for wheelchair users.
96	Grand Union Alliance; London Gypsy & Traveller Unit; Kensington & Chelsea Council	**Gypsies and travellers:** Concerns raised that the OPDC Gypsy and Traveller Accommodation Needs Assessment does not identify any additional requirement for pitches for Gypsies and Travellers and that this may not be inaccurate reflection of real need.	No change proposed. OPDC has followed the NPPF and NPPG in determining that there is no additional need. However, OPDC will work with Ealing Council on how the existing site can be improved. The SHMA has been updated to reference the housing needs of the households that are not travelling for work and not requiring a pitch.
97	Imperial College London; Old Oak Park (DP9); The Hammersmith Society; Home Builders Federation, 1 local resident	**Student housing:** Student housing should not compromise the delivery of conventional housing but it may form part of the mix of housing types in a successful and balanced community.	Noted. The Local Plan supports a mix of housing types, including student housing. Student housing meets important housing needs in London, given the areas prevalence of universities and other higher education institutions. Any proposal for student housing would need to be considered against Policy H10, which seeks to ensure it contributes to the vibrancy and diversity of an area, especially in the early phases of the plan period, is located in areas with high PTAL or is easily accessible by non-motorised forms of transport, does not undermine the delivery of conventional self-contained housing supply and housing targets and does not result in overconcentration in any one specific location. All

			proposals would also need to be accompanied by a Residential Management Plan.

8. Employment

	Who raised the issue	What the issue is	What we're doing to address the issue
98	Grand Union Alliance; Midland Terrace Resident's Group, Old Oak Interim Forum; Old Oak Park (DP9); London Brent Council; GLA; Imperial College London; RBKC; LSDC; The Hammersmith Society; 2 local residents	**Evidence of demand:** It is not clear what demand there is for industrial/commercial floorspace or other potential sectors and workspaces. Additional evidence would be required to consider this. Existing economic clusters/sectors and areas of strength need to be identified and supported. New opportunities/links should also be highlighted; suggestions included: creative activities, clean tech/low carbon/circular economy, high tech and digital, life sciences, academic related incubator uses, advanced manufacturing, medical research, robotics and culture.	Change proposed. OPDC has undertaken a Future Employment Growth Sectors Study (FEGSS) to gather further information on supply and demand for employment in the local, London and wider economy and to understand current strengths within OPDC's area and opportunities for new sectors to emerge and be located in Old Oak and Park Royal. The recommendations from this have been embedded in the Local Plan.
99	Grand Union Alliance, Harlesden Neighbourhood Forum, Midland Terrace Resident's Group, Old Oak Interim Forum, The Hammersmith Society; Ealing Council; SEGRO; 9 residents; 1 local business	**SIL release:** Suggestion that more Strategic Industrial Location (SIL) could be released, or used for a more flexible (mixed) range of uses to create a transitional buffer between existing industrial and residential uses, help better integrate existing residential areas. A number of locations are put forward as preferred locations for mixed uses. However, there were also comments	No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering

		supporting the protection of SIL and suggestion that Old Oak West should be de-designated in place of Westway/Brunel Road.	sustainable communities, specifically in relation to residential amenity and providing local employment opportunities.
100	Grand Union Alliance; The Hammersmith Society, local business; 8 local residents	**Impact on existing businesses:** Concerned about how existing businesses/sectors/jobs, particularly small businesses, may be affected and early prioritisation of support for these. The potential impacts described include: • Increasing values/rents • CPO/displacement/relocation • Operational disruption It is recognised that opportunities should be identified, to retain existing buildings and support and expand these businesses.	Change proposed. OPDC recognise the importance of helping to minimise and mitigate the impacts on existing businesses and the provision of ongoing support. Policies SP5 and the Employment chapter include policies to protect strengthen and intensify the Strategic Industrial Location (SIL) in Park Royal to support business and job opportunities. Policy E1 supports proposals that seek to retain or re-provide existing employment uses within suitable on-site premises across Old Oak. Large-scale regeneration of the area will bring change. HS2 will have an impact on existing businesses leading to some CPO and displacement; however, this is outside of the control of OPDC.
101	Ealing Council; Brent Council; Midland Terrace Resident's Group; LSDC; Old Oak Park (DP9); Grand Union Alliance, Association for the Cultural Advancement through visual Art, Art West 2015, Old Oak Neighbourhood Forum,	**Workspaces:** Suggestion for the Plan to consider a broader range and size of workspaces needed instead of being restricted to open workspace. There was a particular emphasis given to affordable workspace and artists'/creative industries as part of this. There was specific support for a policy on affordable workspace and other comments were encouraging micro and SME, incubator, innovation centre, live/work units, open and artist's space. It was	Change proposed. The Local Plan supports a mix of employment space and typologies to attract a range of businesses to the area. Policy E2 and E3 recognise the importance of securing smaller workspaces to support SMEs and start-ups, as well as affordable workspace.

	14 local residents, 2 local businesses	recognised that it would be useful if the approach was flexible, was more spatially specific and considered the viability of providing different typologies.	
102	Grand Union Alliance, Brent Council, West Twyford Resident's Group, 2 local residents	**Amenity impacts:** Need to consider amenity impacts of employment uses. Proximity/ arrangement of different land uses or existing inappropriate uses in relation to existing residential areas needs to be carefully considered and regulated.	No change proposed. The Local Plan continues to highlight areas which are more sensitive to the impact of development - this includes existing residential areas. The Local Plan also sets out the need to protect local amenity. It will be important that new employment space proposals are designed and located taking account of their impacts on environment and microclimate.

9. Town Centre Uses

	Who raised the issue	What the issue is	What we're doing to address the issue
103	Grand Union Alliance, Wells House Road Resident's Association, 4 local residents	**Additional town centres:** A new neighbourhood centre should be located by the Atlas Road roundabout A more flexible approach should be taken in Park Royal to allow smaller retail clusters to develop	Change proposed. The Retail and Leisure Needs Study and Local Plan have been updated to identify a new neighbourhood centre in this location, named 'Atlas Junction'. This has resulted from further work looking into the spatial requirements for retail provision in the OPDC area and acknowledgement of both committed and implemented schemes at Atlas Junction, which are resulting in the clustering of retail uses in this location, which can help to meet the needs of new development and address deficiencies in access to town centre uses for local communities.
104	Brent Council, Hammersmith and Fulham Council, Grand Union Alliance, Ealing Council	**Old Oak High Street:** Object to or raise concerns regarding the proposed designation of a major town centre at Old Oak High Street, as it could potentially draw trade from neighbouring centres, particularly Harlesden, as well as further afield centres such as Ealing.	No change proposed. Officers propose to continue to identify Old Oak High Street as a potential major town centre. The draft Retail and Leisure Needs Study identifies the need in the centre to provide over 50,000sqm of A-class uses alone, which puts it within the Major Town Centre bracket in Annex 2 of the London Plan. This does not account for the floorspace requirements for culture, sports, leisure and community uses.

	Brent Council, Grand Union Alliance, Harlesden Neighbourhood Forum, Diocese of London, 1 local resident Royal Borough of Kensington and Chelsea, Old Oak Park (DP9), Imperial College London,	Need a clearer recognition that the designation of a centre will impact on Harlesden's growth and that OPDC, working with Brent Council, the Harlesden Neighbourhood Forum and other community groups must be active in mitigating negative impacts Other supported the designation of a major centre, recognising the significant retail needs generated by the development, the role of town centre uses to placemaking and the proposed controls that OPDC's policies have in place that would mitigate any negative impacts	The Local Plan puts in place appropriate safeguards to ensure that impacts on neighbouring centres are minimised. Impact Assessments are required for schemes providing over 5,000sqm in Old Oak and proposals are required to submit a town centre enhancement strategy, where proposals are likely to have adverse impacts. However, officers agree with the need for close working with Brent Council and local community groups to ensure that Harlesden remains a successful town centre. Policy SP6 requires that the new town centre hierarchy complements the surrounding town centre network, including centres like Harlesden, Shepherd's Bush, Acton and Ealing.
105	Brent Council, Old Oak Park (DP9)	**Phasing:** The plan needs to set out clearer controls around the phasing of retail to ensure that it's viable and does not detrimentally impact on nearby centres. The quantum of need should also be broken down and distributed across Old Oak with one stakeholder arguing that the main hub of the centre should be north of the canal	Change proposed. Policy TCC3 requires the delivery of A-class uses to be phased so that they are delivered in accordance with the demand created by new homes and jobs. Officers propose to continue to identify Old Oak High Street as a potential major centre. The draft Retail and Leisure Needs Study identifies the need in the centre to provide over 50,000sqm of A-class uses alone, which puts it within the Major Town Centre bracket in Annex 2 of the London Plan. This does not account for the floorspace requirements for culture, sports, leisure and community uses.

			The Local Plan identifies that this should be spread across a number of places. The Town Centre will be focussed on the High Street, which runs north-south through the site. The largest concentration would be closest to the HS2 station in Old Oak South. North of the canal in Old Oak North, the town centre would provide for a more local need.
106	Brent Council, Hammersmith and Fulham Council, Imperial College London, Old Oak Park (DP9)	**Town Centre Boundaries:** The next draft of the Local Plan needs to set clearer town centre boundaries and potentially define primary frontages.	No change proposed. The revised Local Plan includes a policies map, which sets a detailed boundary for Park Royal Neighbourhood Centre. For Old Oak High Street, North Acton and Atlas Junction, the exact alignment of the High Street has not yet been fixed, and for North Acton and Atlas Junction, the exact location of centre is yet to be determined, so the policies map so provides an indicative boundary, in a similar style to LLDC's proposals for new district and neighbourhood centres in their Local Plan.
107	Brent Council, Grand Union Alliance, Old Oak Park (DP9), Royal Borough of Kensington and Chelsea	**Impact Assessments:** Some stakeholders argued that the threshold of 5,000sqm and 2,500sqm for a retail impact assessment is too high and not appropriate, whilst others argued that as quantums had already been tested in the Retail and Leisure Needs Study, impact assessments should only be required for schemes that exceed the quantums within the study.	No change proposed. The Retail and Leisure Needs Study has assessed the impact of town centre uses on designated centres and identified appropriate mitigation measures to ensure that impacts are minimised. These measures have been incorporated into the Local Plan's policies. The thresholds identified in the Retail and Leisure Study and Local Plan accord with the threshold in the NPPF, but goes beyond these requirements by also identifying that the impact assessments would also be required within designated centres, as these are emerging, as not yet established centres. OPDC considers this approach will ensure that impacts on existing designated centres are appropriately mitigated. The Retail and Leisure Needs Study identifies that as 3 out of the 4 proposed town centres within the OPDC area were not

			designated centres prior to this Local Plan, it is sensible to still require impact assessments to ensure that impacts on existing designated centres are minimised.
108	Brent Council, Diocese of London, Hammersmith and Fulham Council	**Healthy town centres:** Consultees supported OPDC controlling an overconcentration of betting shops, pay-day loan shops games arcades and takeaways. Consultees stated that OPDC should set clear policy as to what constitutes overconcentration and should also set a clear limit on the proximity of takeaways to schools.	Change proposed. The revised Local Plan is supported by a Healthy town centres study, which provides evidence supporting OPDC's approach to controlling takeaways, betting shops etc. OPDC's policy approach towards controlling these uses is set out in Policy TCC2.
109	Brent Council, Old Oak Park (DP9)	**Night time economy:** Should avoid a blanket approach to night–time economy uses. In particular OPDC should take a more flexible approach to opening hours in Park Royal to support businesses that operate 24 hours.	No change proposed. OPDC considers that the policy as currently drafted allows for sufficient flexibility for a developer to justify extended opening hours, subject to certain criteria being met, such as not causing detrimental harm to the amenity of residents and not resulting in harmful cumulative impacts.
110	Grand Union Alliance	**Culture:** Concern that approach is too strategic and focussed on meeting London-wide needs rather than addressing deficiencies in local needs.	No change proposed. OPDC considers that the policy strikes an appropriate balance in recognising that culture can help to meet both local and London-wide needs.
111	The Hammersmith Society, 1 local resident	**Public art:** Should have a policy requiring delivery of or contributions towards public art installations	Change proposed. The revised Local Plan identifies the need for provision or contributions towards public art.

10. Social Infrastructure

	Who raised the issue	What the issue is	What we're doing to address the issue
112	Brent Council; Royal Borough of Kensington	**New social infrastructure**: Infrastructure should be included as part of the	Change proposed. OPDC's Local Plan is now supported by more detailed evidence on social infrastructure. This includes the allocation

	and Chelsea; Diocese of London; Midland Terrace Resident's; Old Oak Interim Forum; Hammersmith and Fulham Council, 1 local resident	development. It was recognised that these may be isolated in the early phases so the expansion of existing facilities should be explored; however, it was also noted that existing education and health infrastructure may already be under strain/ have no spare capacity.	of sites to deliver required on-site infrastructure. Social infrastructure requirements are set out in Policies TCC4 and in the place policies, specifically Policy P1 (Old Oak South), P2 (Old Oak North) and North Acton and Acton Wells (P7).
113	Grand Union Alliance; Old Oak Park (DP9); The Hammersmith Society; Diocese of London	**Funding:** Further clarity is needed on how social infrastructure will be secured, funded and managed.	No change proposed. A range of implementation and funding mechanisms have been identified in the Delivery and Implementation chapter to secure social infrastructure, including on-site delivery, Community Infrastructure Levy (CIL), Section 106 contributions, funding through service providers and funding through borrowing. OPDC has prepared and is updating evidence on the costs. The Education and Health Study also identifies alternative delivery routes for these facilities and alternative sources of funding based on these differing approaches. Officers are proposing that given the constant changes in the ways that social infrastructure is funded and managed, the Local Plan should not specify arrangements for each infrastructure type. OPDC will be working on social infrastructure delivery as part of its wider regeneration programme.
114	Brent Council, Grand Union Alliance; Hammersmith Society; Diocese of London; Old Oak Interim Forum, Midland Terrace's	**School provision:** Existing schools do not have the capacity to meet additional demand. The Plan should provide greater clarity/certainty about the size, phasing and location of school(s), including identifying/safeguarding of land. There was concern that the impacts of school	Change proposed. Further work on education provision has been undertaken as part of OPDC's Education and Health Needs Study. This identifies that there are schools that can be expanded off-site to meet the needs of early phases of development. The revised Local Plan also now clearly identifies the needs for on-site provision. The supporting text to Policy TCC4 recognises that this need is based on current population

	Residents Group; 8 local residents	development should be carefully considered.	projections based on tenure, mix and capacity assumptions and that this need might flex over time and needs to be carefully monitored and that there therefore needs to be a degree of flexibility in the approach taken to social infrastructure provision.
115	Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, Ealing Council	**Support for education uses:** Some support for both further and higher education in the OPDC area.	Noted. OPDC is supportive of higher education facilities, and recognise that these, amongst other uses, may provide wider benefit in terms of being a catalyst use which promotes activity and vibrancy. High education facilities would be likely to be considered as catalyst uses. Catalyst uses are supported in Policy SP6, but would be required to be assessed against relevant Local Plan policies, including the specific catalyst uses criteria in Policy TCC8.
116	Grand Union Alliance; Andy Slaughter MP; The Hammersmith Society; Midland Terrace Resident's Group; Old Oak Interim Forum; HUDU; 5 local residents	**Loss/deficiency of infrastructure:** Strong concerns about the existing loss/deficiency of infrastructure around the OPDC area and, on this basis, whether there will be sufficient infrastructure capacity to support the anticipated population, particularly primary and secondary health care facilities.	Noted. OPDC's current draft Local Plan identifies the need to safeguard social infrastructure where a continuing need exists. OPDC's Education and Health Needs Study and Sport England's Sports Courts and Swimming Pools Studies have assessed surrounding facilities in order to derive the appropriate approach to infrastructure provision in the OPDC area. OPDC can only secure planning contributions from development to mitigate the development's impacts and cannot secure contributions to address existing deficiencies in provision.
117	LSDC, Brent Council, Midland Terrace Resident's Group, Old Oak Park (DP9), 1 local resident	**Public health:** Support for wider role of public health and looking at a broader range of health provision and how this could be achieved through the healthy new town concept.	Noted. OPDC is also supportive and acknowledges the importance of public health and has appointed a dedicated Health Advisor who will be working collaboratively with a range of stakeholders to help embed public health objectives into relevant policies and strategies. The revised Local Plan includes details of required on-site healthcare provision in Policy TCC4, in relevant place policies and in OPDC's infrastructure Delivery Plan (IDP).

118	Local resident, local resident, Hammersmith and Fulham Historic Buildings Group; Grand Union Alliance; Local resident, 13 local residents	**Community facilities:** Community facilities should be affordable, publically accessible, safe and designed around a multi-use concept. They should also explore community ownership/management models and cater for a range of audiences and activities, but particularly for children and young people.	Noted. Policy D3 requires all buildings to be accessible and inclusive. Policy TCC4 secures the delivery of social infrastructure facilities in OPDC's Infrastructure Delivery Plan (IDP). This includes 2 community hub facilities providing multi-use space. Policy TCC4 also requires appropriate long-term funding sources for community facilities and Policy DI3 supports the community ownership and management of assets.
119	Brent Council, GUA, Historic England, Midland Terrace Resident's Group, The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group	**Pubs:** Strong support for the protection of pubs, but there are opportunities to strengthen the policy.	Change proposed. Officers have considered the responses to the consultation and have appropriately updated the policy to ensure that it is robust and gives adequate protect to public houses.

11. Transport

	Who raised the issue	What the issue is	What we're doing to address the issue
120	Diageo, Grand Union Alliance, Midland Terrace Residents Group, Residents, Old Oak Interim Forum, SEGRO,	**Car Parking:** A mix of responses were received including requests for more stringent policies on car parking and concern over how little car parking would be provided. There was also concern over the different parking requirements between Old Oak and Park Royal.	Change proposed. The car parking policy has been revised to respond to the varying public transport accessibility level across the area spatially and also to recognise that the public transport accessibility level will change over time as transport infrastructure is delivered.
121	TfL and GLA	**Cycle Parking:** TfL and the GLA have queried whether the cycle parking policy is ambitious enough and whether it pushes developers to provide sufficient cycle parking for OPDC to successfully encourage cycling increases over the next 20 years.	Change proposed. OPDC has been working with TfL to ensure the policy adequately reflects TfL's and the GLA's aspirations for cycle parking. Cycle infrastructure requirements are identified in OPDC's Infrastructure Delivery Plan (IDP) and relevant place policies (chapter 4).
122	Old Oak Park	**Electric Vehicle Charging Points Policy:** The Old Oak Park team asked for the Local Plan Electric Vehicle policy wording to be the same as the London Plan.	Change proposed. OPDC aspires to ensuring all new parking spaces across the area have passive provision and at least 20% active provision for EV Charging Points. The Local Plan will ensure sufficient flexibility regarding the Electric Vehicle Charging Point Policy (covered in Policy T4) to ensure it is adaptable to changes in technology.
123	GLA, Residents, Canal and River Trust	**Canal Policy:** Responses asked why there isn't a policy on the Grand Union Canal in the Transport	No change proposed. OPDC currently has a Grand Union Canal Place policy (P3) within the Local Plan, which covers a range of aspects relating to the canal, including the use of the

		Chapter and more information in the Local Plan about the role of the canal.	canal for freight and the towpath providing an important movement link. The importance of the canal as part of the movement network is also highlighted in Policy SP7 (Connecting People and Places)
124	Brent, Ealing, residents	**Pedestrian network suggestions:** A number of consultation responses provided suggestions for new walking connections and improvements to existing connections.	Change proposed. OPDC commissioned consultants to undertake a Public Realm, Walking and Cycling Strategy with TfL. The objective of this piece of work was to provide a framework for delivering an exemplar sustainable, accessible urban environment for Old Oak and Park Royal. As part of this work the consultants have undertaken pedestrian modelling to understand how demand will change across the walking network with new developments and transport improvements. They have also undertaken a Pedestrian Environment Review Survey to understand the existing areas required for improvements to encourage more walking. The study has recommended a pedestrian and cycling network which extends beyond the OPDC boundary to surrounding areas. The recommendations from this study have been appropriately embedded into the Local Plan and Infrastructure Delivery Plan (IDP).
125	Grand Union Alliance, Residents, Midland Terrace Residents Group, Old Oak Interim Forum	**Pedestrian and cycle segregation/ Pedestrian and cycle conflicts:** Another key issue raised was the requirement to ensure segregation between pedestrians and cyclist	No change proposed. The cycling policy supporting text states that cycle improvements should give consideration to the impact of cycling infrastructure on pedestrians.
126	Brent Council, Grand Union Alliance, GLA, TfL, Grand Union	**Cycle network suggestions:** A number of consultation responses provided suggestions for new cycling	Change proposed. OPDC commissioned consultants to undertake a Public Realm, Walking and Cycling Strategy with TfL. The objective of this piece of work was to provide a

	Alliance, Harlesden Neighbourhood Forum, Residents, Midland Terrace Residents Group, West Twyford Residents Association	connections and improvements to existing connections. Another key area was to ensure cycle links are extended outside the OPDC boundary.	framework for delivering an exemplar sustainable, accessible urban environment for Old Oak and Park Royal. As part of this work the consultants undertook cycle modelling to understand how demand will change across the cycle network with new developments and transport improvements. The consultants used London Cycle Design Standards to provide recommendations for improvements to the existing cycle network in the OPDC area and to set principles for any new cycle infrastructure and routes. The study has recommended a pedestrian and cycling network which extends beyond the OPDC boundary to surrounding areas. The recommendations from this study have been appropriately embedded into the Local Plan and Infrastructure Delivery Plan (IDP).
127	Friend's of Wormwood Scrubs, Midland Terrace Residents Group, Old Oak Interim Forum	**Cycle links through Wormwood Scrubs** Stakeholders indicated their concern over, or lack of support for, cycle routes through Wormwood Scrubs. Others indicated they didn't want any new cycle routes to impact on woodland in Wormwood Scrubs	No change proposed. The principle of improved access to Wormwood Scrubs and the ability to move around the Scrubs will continue to be promoted in the Local Plan. Any proposals for the Wormwood Scrubs would need to be sensitive to its ecology and designation as Metropolitan Open Land (MOL). Any decisions regarding potential measures for Wormwood Scrubs would need approval from both OPDC Board and the Wormwood Scrubs Charitable Trust.
128	Grand Union Alliance, Harlesden Neighbourhood Forum, Midland Terrace Residents Group, Old Oak Interim Forum,	**Vehicular network suggestions** A number of consultant responses expressed concern over the current vehicular network indicated in the Local Plan or queries for further information about	Change proposed. OPDC commissioned consultants to undertake a Public Realm, Walking and Cycling Strategy. The study reviewed the Regulation 18 Local Plan network but undertook updates to it and has recommended a proposed new vehicular network, which has been appropriately embedded into the Local Plan.

	Royal Borough of Kensington and Chelsea, The Hammersmith Society, West Twyford Resident's Association, 1 local resident	the network. There were also a number of suggestions for changes to and new routes.	
129	Chiltern Railways, GSK, Hammersmith and Fulham Council, Hounslow Council, GSK, Midland Terrace Residents Group, Old Oak Interim Forum, Network Rail, Hammersmith Society, West London Line Group, West Twyford Residents Association, 1 local resident	**New Rail service connections and request to safeguard land to implement them** A number of responses to the local plan were suggestions for new rail infrastructure to be stated in the Local Plan and safeguarding of land to enable future development of rail infrastructure.	Noted. OPDC has been working with TfL, Network Rail and DfT to investigate future rail proposals. Where rail proposals are sufficiently developed, the Local Plan safeguards land for their delivery. This safeguarding is identified in the places chapters and/or in the Infrastructure Delivery Plan (IDP). Emerging proposals for rail connections which are not sufficiently developed have not currently been identified for safeguarding, but if proposals were to gain greater certainty, the IDP, which is a live document separate to the Local Plan, could be appropriately updated to reflect the requirement to deliver this infrastructure and land for its provision would be appropriately safeguarded through the requirements of Strategic Policy 10 (integrated delivery).
130	Old Oak Park (DP9)	**Evidence Base for the Local Plan** A number of responses querying the assumptions and conclusions in the Old Oak Strategic Transport Study (produced by TfL) and the Park Royal Transport Study commissioned by OPDC and TfL were provided.	Noted. OPDC has reviewed the concerns raised and undertook to update studies where required. Certain assumptions in these studies have been superseded through the work on the Public Realm, Walking and Cycling Strategy and the Local Plan and Infrastructure Delivery Plan (IDP) appropriately refer to the most up to date and relevant infrastructure requirements.

12. Environment and Utilities

	Who raised the issue	What the issue is	What we're doing to address the issue
131	Brent Council, the Hammersmith Society, Grand Union Alliance, Hammersmith and Fulham Council, 8 local residents	**Additional policies:** The Local Plan should include policies on minimising carbon and greenhouse gas emissions, light pollution and odour	Noted. OPDC is considering dealing with issues such as light pollution and odour through an Environmental Standards Supplementary Planning Document (SPD) Minimising carbon and greenhouse gas emissions is dealt with in Policy EU9 (minimising carbon emissions and overheating).
132	Grand Union Alliance, London Sustainable Development Commission	**Clearer policies:** Policies need to be drafted in a way that they are clear what the requirements are during and post construction and across time, recognising that policies and standards should become more binding in the medium and long term	Noted. Policies in the Local Plan need to be drafted work now and in the future. The Local Plan is a 20 year Plan and to ensure its deliverability, officers have ensured that the policies and standards it contains are resilient and fit for purpose for the full lifetime of the Plan. Construction impacts are dealt with in Policy T8 in the transport chapter and through a series of policies in the Environment and Utilities chapter, specifically EU2 (urban greening), EU4 (air quality), EU5 (noise and vibration), EU6 (waste), EU7 (circular and sharing economy), EU8 (sustainable materials) and EU13 (land contamination). Impacts post-construction are also dealt with through these and other policies in the environment and utilities chapter.
133	Old Oak Interim Forum, Midland Terrace Resident's Group, Grand Union Alliance, Royal Borough of Kensington and Chelsea, Brent Council, Diocese of London,	**Environmental Targets:** There was support for OPDC setting ambitious but deliverable environment policies and targets for the area. However, requests were made that the policies and standards need to take	Noted. OPDC acknowledges that targets must be aspirational and ambitious but also deliverable and cognisant of economic viability. The economic viability of environmental standards and policies has been tested through OPDC's Environmental Standards Study and through OPDC's Whole Plan Viability Study.

	London Sustainable Development Commission Old Oak Park (DP9)	account of economic viability or the national government's direction on zero carbon.	In accordance with the NPPF, viability would always be a consideration in the application of planning policy.
134	Environment Agency, Old Oak Park (DP9), Thames Water, London Sustainable Development Commission, Grand Union Alliance, Royal Borough of Kensington and Chelsea, 2 local residents	**Water:** support for the overriding approach to water management and recognition of need to achieve greenfield run-off rates. Support for above ground water attenuation but concern regarding the potential use of Wormwood Scrubs for this, although others were supportive of the use of Wormwood Scrubs for above ground water attenuation.	Noted. The Integrated Water Management Study has been updated to take on board comments from stakeholders. The Local Plan proposes to continue to identify the potential for strategic SuDS to manage surface water. This could include the potential for attenuation on Wormwood Scrubs, which could also have benefits for biodiversity and help to manage the Scrubs' own surface water flooding issues. Any proposals for Wormwood Scrubs would need to be agreed by the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham
135	North London Waste Plan, London Waste Planning Forum, City of London Corporation, Royal Borough of Kensington and Chelsea	**Waste apportionment:** OPDC's waste study evidence should identify waste streams for construction/demolition, low level radioactive, agricultural, hazardous and waste water waste streams. Relationships with the Western Riverside Waste Authority should also be acknowledged.	Change proposed. Requirements for these waste streams are identified in OPDC's Waste Technical Paper supporting study. The supporting text to the waste policy (EU6) refers to the ongoing and continual work between OPDC and the Western Riverside Waste Authority boroughs and West London Waste Authority boroughs.
136	Resident, Environment Agency, Brent Council, City of London Corporation, North London Waste Plan	**Existing waste sites:** There was generally support for the relocation of existing waste sites, although recognition that this should happen in a sequential fashion, looking firstly to relocate within the OPDC area before considering other relocation options.	Change proposed. In accordance with London Plan Policy 5.17H, the Local Plan requires developers to ensure waste management site(s) which are lost to a non-waste use will be required to provide compensatory site provision which normally meets the maximum throughput that the site could

	Hammersmith and Fulham, Grand Union Alliance, Harlesden Neighbourhood Forum, Midland Terrace Resident's Group, TITRA, 2 local residents	Hammersmith and Fulham were supportive of the retention of the Powerday waste site but other stakeholders raised concerns about its continued presence because of dust, noise and air quality issues.	achieve and supports its relocation to a suitable site in the following sequential manner: • within the borough where the site is located; • within the West London Waste Authority and Western Riverside Planning Authority areas; or • within Greater London OPDC will continue to safeguard the Powerday waste site. The rationale for safeguarding Powerday (Old Oak Sidings) is outlined in the Waste Apportionment Study supporting evidence paper. It is required for safeguarding for apportionment to ensure that LBHF can meet its apportionment targets. This is a requirement of para 5.80 of the London Plan.
137	Environment Agency, Old Oak Park (DP9), London Waste Planning Forum, Wells House Road Residents Association, London Waste Planning Forum, 1 local resident	**New or expanded waste sites:** Requests were made that any new or expanded waste sites should be located well away from existing or planned residential areas and that the sites themselves should be fully enclosed. General requests were made for a criteria based policy to assess new waste site applications.	Change proposed. The waste policy has been revised to include criteria for the assessment of new and/or expanded waste sites. This includes the requirement for waste facilities to be fully enclosed. Other relevant Local Plan policies would also apply to waste sites, in particular, policies in the Transport and Environment and Utilities chapters.
138	Greater London Authority, Grand Union Alliance, WRc, London Sustainable Development Commission	**Waste hierarchy:** Requests were made that the waste hierarchy is more directly referenced in the Local Plan and that the policies promote re-use and recycling before considering measures such as energy from waste	Change proposed. Although the waste hierarchy is clearly articulated in the London Plan and OPDC has generally taken the approach to avoid repetition of London Plan policy, it is recognised that managing waste up the waste hierarchy is an important issue and this is now included in the revised waste policy.
139	London Sustainable Development Commission WRc, Old	**Circular economy:** There was general support for the inclusion of a circular economy policy and OPDC's development	Change proposed. OPDC has produced a Circular and Sharing Economy Strategy. The recommendations from this have been appropriately embedded into the Local Plan. Policy

	Oak Park (DP9), Surrey County Council, London Waste Planning Forum	of a Circular Economy Strategy in support of the next draft Local Plan. Requests were made to ensure that the principles arising from the strategy are embedded in the next draft Local Plan.	EU7 deals directly with the circular and sharing economy and requires major development proposals to submit a Circular and Sharing Economy Statement demonstrating how proposals will support the circular and sharing economy through redevelopment in the area.
140	WRc, London Sustainable Development Commission, 1 local business, 1 local resident Grand Union Alliance, Old Oak Park (DP9)	**Energy:** Concerns were raised that OPDC has jumped to the solution of district heating without having adequately considered other energy sources. Requests were made that the next draft of the Local Plan be more specific on infrastructure requirements, such as the size of the energy centre and where and when it needs delivering.	Change proposed. The Local Plan is supported by a Utility Study which has explored a number of energy systems. OPDC's energy systems policy appropriately embeds the recommendations from this study into the Local Plan. Energy systems infrastructure requirements are included in OPDC's Infrastructure Delivery Plan (IDP).
141	Grand Union Alliance, Midland Terrace Resident's Group, Segro, 2 local residents	**Digital:** The policy should recognise that there are existing issues with digital connectivity in the area that need to be overcome and that future-proofed superfast broadband will be critical to the success of employment provision in both Park Royal and Old Oak.	Change proposed. The revised Local Plan acknowledges the current deficiencies in the broadband network in the area and the need to work with broadband, telecommunication providers and developers to overcome this.
142	London Sustainable Development Commission, Brent Council, Environment Agency, GiGL, The Hammersmith Society, Hammersmith and Fulham Historic	**Green infrastructure study:** There was support for OPDC undertaking a Green Infrastructure and Open Space Study. A number of stakeholders offered to provide assistance with this and suggested data that OPDC would find helpful to review as part of the study	Change proposed. OPDC's Environmental Standards Study informs the revised Local Plan and sets standards for open space provision. This has been developed in collaboration with the boroughs and key stakeholders such as Natural England, Environment Agency, TfL and the Greater London Authority. OPDC's standards for open space provision are set out in Policies SP8 (Green Infrastructure and Open Space),

	Buildings Group, 6 local residents		EU1 (Open Space) and EU2 (Urban Greening and Biodiversity).
143	Brent Council, Grand Union Alliance, The Hammersmith Society, Ealing Council, Hammersmith and Fulham Historic Buildings Group, Natural England, London Sustainable Development Commission, 11 local residents	**Green infrastructure standards:** A number of standards or targets were suggested by stakeholders, including habitat creation, tree diversity and coverage, open space provision, green roofs and walls	Change proposed. Suggested standards have informed the development of the Environmental Standards Study. Relevant standards from this have been embedded into the Local Plan. OPDC is proposing to develop an Environmental Standards Supplementary Planning Document (SPD), which will include more detailed environmental standards for the OPDC area. This SPD would be adopted following the adoption of the Local Plan.
144	Brent Council, Hammersmith and Fulham Council, Ealing Council, Royal Borough of Kensington and Chelsea, 1 local resident	**Mineral extraction:** Concerns were raised that the policy as currently drafted is too positively worded and requests made that the policy is clearer about the suitability of the OPDC area for mineral extraction	Change proposed. The supporting text to the mineral extraction policy has been amended to clarify that given the area's geology, it is unlikely that mineral extraction would be economically feasible. The NPPF requires local planning authorities to plan positively for mineral extraction. OPDC's policy supports mineral extraction but identifies a series of criteria that must be met for mineral extraction to be considered acceptable.
145	Environment Agency, Grand Union Alliance, Hammersmith and Fulham Council, TITRA, 1 local resident	**Air Quality Study:** Stakeholders made a number of suggestions for measures to incorporate into the Air Quality Study and associated policy, including: - Providing "express routes" to get HGVs off small local roads; - Extend monitoring locations; - Avoidance of street canyons; - Specific measures around Old Oak Lane	Change proposed. The Air Quality Study has been updated to take on board a number of comments from stakeholders. Policy T8 deals with construction traffic management and supports the use of consolidation centres, maximum use of rail and water for transporting construction, use of local waste management sites and production of Construction Logistics Plans and Construction Code of Practices to manage construction impacts on highways. OPDC does not propose to extend the coverage of monitoring locations as the identified

			locations within the Regulation 18 Local Plan were considered to provide good coverage. The Air Quality Study has been updated to require avoidance of street canyons and the air quality policy (EU4) refers to this need. Old Oak Lane was already identified as an air quality focus area in the Regulation 18 Local Plan.
146	Grand Union Alliance, Hammersmith and Fulham Council	**Air Quality policy:** Stakeholders felt that OPDC should be more ambitious in terms of its approach to air quality, by making the policy more binding and stronger in terms of its requirements of developers and proposed mitigation measures. Hammersmith and Fulham stated that any measures would need to be agreed with the council, to reflect the council's statutory duties relating to air quality.	Change proposed. The air quality policy has undergone substantial revisions to make the requirements more binding and tie the policy into updates in the Air Quality Study. The supporting text to the policy refers to the statutory duties of local authorities and the need for recommendations in borough Air Quality Action Plans (AQAPs) to be considered.
147	Grand Union Alliance, Old Oak Park (DP9), the Hammersmith Society, 2 local residents	**Noise:** Requests were made to also consider vibration in the policy and to amend the policy title accordingly. Requests were also made for the policy to set clear standards for noise and to identify areas where there are likely to be high generators of noise and what must be done in these locations to mitigate this impact, and also identify more tranquil areas and identify what must be done to keep them tranquil.	Change proposed. The title of the policy has been revised to include vibration and associated policy requirements have been inserted. The policy refers to the requirement for development to demonstrate that it complies with the most relevant and current building standards (BS) and that unacceptable impacts must be identified and appropriate mitigation measures secured. The policy also identifies that particular consideration to noise generators such as waste sites, cultural facilities, strategic roads or industrial uses.
148	Hammersmith and Fulham Council, Old Oak Park (DP9), The	**Contaminated land:** there was broad support for the Local Plan policy. Stakeholders felt that the policy should be	Change proposed. The policy has been updated to refer to the potential exploration of strategic approaches to remediation. The policy and supporting text have also been

	Hammersmith Society, Grand Union Alliance	clearer that a strategic approach should be taken to contamination and that a global remediation strategy should be more clearly supported. Requests were made for more formalised relations between OPDC, the Environment Agency and the local authorities. Hammersmith and Fulham specifically requested that the policy clarify that the local authority remains environmental regulator and that as a consequence, any proposals would need to be agreed by the local authorities.	updated to clarify the responsibilities of OPDC, the EA and the host local authorities.

13. Delivery and Implementation

	Who raised the issue	What the issue is	What we're doing to address the issue
149	Old Oak Park (DP9), Canary Wharf PLC, Brent Council, Montagu Evans (for a private land owner, Quod (for a private land owner)	**Phasing of development and infrastructure:** A range of respondents commented on the phasing of development across the area. Several private landowners expressed a desire to bring their sites forward sooner than set out within the Local Plan. Members of the public were more concerned that the planning for the longer term phases was occurring too soon and that the infrastructure was not in place to support the amount of development that	Change proposed. The phasing diagrams and Development Capacity Study have been updated to take on board comments from stakeholders. Policy SP10 supports development being brought forward in advance of the phasing identified. The Local Plan is supported by an Infrastructure Delivery Plan (IDP) which identifies what infrastructure is needed, when and sources of funding/financing. Further work has been undertaken across a number of studies to identify infrastructure requirements and the phasing

		was occurring in earlier phases. Conversely developers claimed that infrastructure was being front-loaded and that this was not required.	of infrastructure to support the delivery of homes and jobs and this has been included in the IDP.
150	Old Oak Park (DP9), HUDU, Hammersmith and Fulham Council, Grand Union Alliance, Brent Council, 3 local residents	**Infrastructure Delivery:** Concern raised over various aspects of infrastructure delivery, Including education - with the Boroughs concerned regarding the ability of the existing schools capacity to expand; and health – the need to be flexible with this.	Change proposed. Further work on education provision has been undertaken as part of OPDC's Education and Health Needs Study. This identifies that there are schools that can be expanded off-site to meet the needs of early phases of development. The revised Local Plan also now clearly identifies the needs for on-site provision. The supporting text to Policy TCC4 recognises that this need is based on current population projections based on tenure, mix and capacity assumptions and that this need might flex over time and needs to be carefully monitored and that there therefore needs to be a degree of flexibility in the approach taken to social infrastructure provision.
151	Brent Council, Diocese of London, 15 local residents	**Infrastructure Prioritisation:** Various opinions expressed regarding what infrastructure should be prioritised. Consensus that education and health in particular are important for social infrastructure. Improvements to Willesden Junction Station also got particular mention.	Change proposed. Education and health needs have been informed by OPDC's Education and Health Study. Needs are contingent on the speed of delivery and type of housing (tenure, size, quantum), but the Infrastructure Delivery Plan (IDP) identifies likely dates that facilities need to be delivered or expanded. On-site requirements

			have had sites allocated and these are referenced in Policy TCC4 and in the relevant place policies.
152	Grand Union Alliance, Hammersmith and Fulham Disability Forum, Old Oak Park (DP9)	**Infrastructure costs and funding gap:** Some concern were expressed regarding the level of funding gap, how this would be covered and the impact this could have on the delivery of Affordable Housing.	Change proposed. The revised Local Plan sets out further detail in the Delivery and Implementation chapter on the strategies that OPDC will employ to support the timely regeneration of the area and secure the necessary infrastructure to support the needs of the new population. OPDC's Local Plan is supported by an Affordable Housing Viability Assessment and Whole Plan Viability Assessment, which has assessed the viability of affordable housing delivery to inform OPDC's affordable housing policy. The Delivery and Implementation chapter recognises that a balance will have to be struck between the requirements of the Local Plan and the priorities to deliver affordable housing, sustainability standards and infrastructure.
153	Hammersmith and Fulham Council, Brent Council, GiGL, Historic England	**Monitoring:** Several suggestions were made regarding additional matters to monitor, including: - the impact of the development on the existing communities; - Biodiversity; - Heritage; and - Brownfield land	Change proposed. OPDC's Local Plan is supported by a range of Key Performance Indicators, set out in a supporting document to the Delivery and Implementation chapter, which will be monitored through OPDC's Authority Monitoring Report (AMR), to monitor the success of OPDC's planning policies. Policy DI3 also requires developers to submit a post-occupancy survey to support continual learning and dissemination of acquired knowledge on the success or otherwise of developed schemes.
154	GLA, TfL, Hammersmith and Fulham Council, Brent Council, The	**Table 16: Infrastructure requirements additional items:** Requests were made to add items to Table 16:	Change proposed. OPDC's evidence base has been significantly updated between the Regulation 18 and Regulation 19 versions of the Local Plan. The Regulation 19

	Hammersmith Society and 2 local residents	- Mitre Road Bridge; - Additional capacity on North and West London Lines; - Infrastructure to support operation of the Grand Union Canal; - Public realm enhancements; - Cycling facilities; - Items from Park Royal Transport Strategy; - Soil treatment; - Link to Kensal canalside; - Future of Grand Union Canal sub surface 132kV cables; and - Waste disposal facilities.	Plan includes a longer list of infrastructure requirements, informed by this evidence. Suggested infrastructure items were considered as part of this evidence. OPDC's Infrastructure Delivery Plan (IDP) supports the Local Plan and sets out the required infrastructure to support development in the area.
155	Hammersmith and Fulham Council, The Hammersmith Society, Old Oak Interim Forum, Wells House Road Resident's Association, 2 local residents	**Transparency/ Planning applications:** Various comments were received in regards to the transparency of the OPDC of particular note were requests for information of the land transfer, the need for a transparent spend process in regards to s106 and CIL and clarification of the planning applications process for OPDC.	Change proposed. Following comments, OPDC has updated its Statement of Community Involvement to make the requirements of developers both pre and post submission of planning applications clearer. Details on s106 and CIL spend would be published as part of OPDC's Authority Monitoring Report (AMR). Details about the land transfer are provided on OPDC's website, but this is not a matter related to the Local Plan.

Grand Union Alliance proposed vision (see row 6 above)

'The OPDC area has exemplar, sustainable, well-connected and walkable, lifetime neighbourhoods supporting both new and long established residential communities, well-linked with surrounding areas.

OPDC neighbourhoods promote cohesive communities, foster diversity, interaction and social capital. They provide the homes, jobs, training, amenities and services that meet the lifetime needs of local communities and comfortably accommodate those who work, spend leisure time or pass through the area.

They provide exceptionally high quality architecture and buildings that relate sensitively to the built and natural environmental qualities of long-established residential and business areas within and surrounding the OPDC area.

Valued buildings, features, social facilities and amenities that have had long-term importance to communities' sense of place and history have been retained and integrated into new developments.

The life chances of residents in and around the OPDC area are increased through strong local economic activity and employment, supported by an integrated approach to skills, training and apprenticeships through to long-term skilled employment.

Long-established Park Royal Strategic Industrial Location businesses are successfully sustained alongside new industry. Start-up workspaces are provided and affordable business premises have been protected.

Large-scale natural environmental infrastructure that is valued by both local communities and people across London – specifically Wormwood Scrubs and the Grand Union Canal – has been sensitively enhanced and its integrity has been protected. Nature is thriving throughout and beyond the OPDC area.

Appropriate means of transportation and movement in and from the OPDC area put pedestrians central to a user hierarchy. Access to extensive new transport infrastructure sensitively interacts with local neighbourhoods and local transport needs.

Key multi-use catalyst buildings which support the local community and are attractive to visitors are situated in Old Oak North. A new historic and cultural hub (focused in part on the physical re-use and memorialisation of the industrial heritage of the area) developed beside the Grand Union Canal.

Careful phasing of development has meant that individual neighbourhoods have been completed with an appropriate compliment of social and community infrastructure and amenities. Reasonable protection from undue disruption during construction has been achieved. Detailed coping strategies, around having a transient workforce during of construction phases have assisted in this respect.

Local communities have been actively involved early in visioning and planning processes, and continue to play an active role in decision-making in the OPDC area.'

Appendix B

Issues raised by representations on the Regulation 18 draft Local Plan and how these have been dealt with in the Regulation 19 Local Plan

The below provides an overview of the issues raised on the regulation 18 draft Local Plan. This appendix accords with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 17d) parts (iii) and (iv). This section has been ordered in accordance with the Regulation 18 Local Plan, dealing with issues in the following order:

1. General issues and the introduction chapter;
2. the spatial vision, objectives and mission statement
3. the overarching spatial policies chapter
4. the place policies
5. the sustainable development chapter;
6. the design chapter;
7. the housing chapter;
8. the employment chapter
9. the town centre uses chapter;
10. the social infrastructure chapter;
11. the transport chapter;
12. the environment and utilities chapter;
13. the delivery and implementation chapter; and
14. the glossary;
15. comments on the Integrated Impact Assessment (IIA).

Representations were also made against other spatial or thematic supporting studies. Issues arising from these have been summarised next to the relevant place of thematic policies.

The following tables include 5 columns:

1. provides details on which chapter, policy, figure, table, paragraph or supporting study the comment relates to;
2. provides a summary of the issue raised on the Regulation 18 Local Plan;
3. identifies how many stakeholders raised the issue;

4. identifies the names of the stakeholders who raised the issue. Names of groups, companies or professionals have been stated but names of individuals other than elected members have been anonymised. This includes comments raised at workshops or online via OPDC's Online Engagement Platform; and
5. identifies OPDC's response to the comment. The response is precluded by either 'no change proposed', 'change proposed' or 'noted' and is followed, where relevant and appropriate, with an explanation of the response and/or the approach OPDC has taken to addressing the comment.

1. General issues and comments on the introduction chapter

Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
General comment	The document should include headers and footers to aid navigation	1	Diocese of London	No change proposed. The inclusion of headers and footers in not felt necessary to aid navigation; however, each policy includes a box highlighting relevant evidence documents and related policies. The document also includes footnotes for supporting studies.
General comment	the Local Plan should be accompanied by a bibliography for when the Local Plan refers to guidance elsewhere	1	Hammersmith and Fulham Disability Forum	Change proposed. Boxes have been added to the policies identifying the associated evidence documents and footnotes have been added to the supporting text, referencing relevant studies.
General comment	OPDC should take positive steps to make sure that OPDC policies, procedures and practices also do not discriminate against disabled people.	1	Hammersmith and Fulham Disability Forum	No change proposed. OPDC's Local Plan is accompanied by an Integrated Impact Assessment, which includes an Equality Impact Assessment, which assesses the Local Plan policies on people with protected characteristics, which includes disabled people.
1. Introduction, Para 1.34	It is not acknowledged that Old Oak is on the doorstep of one of the most deprived areas in the whole of London.	1	Harlesden Neighbourhood Forum	No change proposed. This was acknowledged in the Introduction chapter of the Reg 18 draft Local Plan and continues to be in the Reg 19 draft Local Plan in the supporting text to Strategic Policy 1 and in the Local Plan Appendix.

General comment	Support the principle of the regeneration of the Old Oak and Park Royal area	10	Imperial College, Old Oak Park (DP9), Andy Slaughter MP, Old Oak Interim Forum, Midland Terrace Resident's Group, the London Forum, Heathrow, the Hammersmith Society, Westkite Ltd, 2 residents	Noted.
General comment	Concern raised that important decisions are being taken in advance of the imminent full review of the London Plan and the Plan should set out a commitment to review the Local Plan following the adoption of the new London Plan	1	Ealing Council	No change proposed. OPDC are working closely with the Greater London Authority to ensure that the Local Plan policies align as closely as possible with those in the emerging London Plan. It is recognised that it may be impossible to align completely with it however and if necessary, OPDC would review the Local Plan to ensure conformity. It is not felt that recognition of this needs to be enshrined in the Local Plan however.
General comment	Support proposals for a proposed Article 4 direction, to remove permitted development rights for the conversion of B1a), B2 and B8 premises in Park Royal	1	Ealing Council	Noted. OPDC consulted on proposals for an Article 4 direction in September 2016.
General comment	The Old Oak and Park Royal Opportunity Areas should be merged in the New London Plan	1	Ealing Council	Noted. This will be considered as part of the production of the new London Plan.

General comment	There is a lack of clarity as to who is in charge and leading this regeneration project, which is confusing and risks a piecemeal approach to planning in the area.	1	Andy Slaughter MP	No change proposed. OPDC is the plan-making authority for the area. A Scheme of Delegation has been agreed with the London Boroughs of Brent and Ealing in Park Royal and Ealing in North Acton to delegate certain planning applications. OPDC do not propose to amend this arrangement.
General comment	There does not appear to be a clear rationale for including Park Royal within the OPDC area	1	Andy Slaughter MP	No change proposed. Park Royal is London's largest industrial estate and a vital cog in the London economy. The Mayor was keen for Park Royal to be included in the OPDC boundary so that it continues to remain a successful estate, by safeguarding its industrial land, identifying opportunities for intensification and setting in place policies and programmes that will allow the Estate to capitalise on the opportunities brought about by the regeneration of Old Oak.
General comment	OPDC should support the principles of neighbourhood planning.	1	The Hammersmith Society	Change proposed. The supporting text to Policy SP2 references the potential for neighbourhood planning to support community empowerment. Further details on the role of neighbourhood planning are included in the delivery and implementation chapter (policy DI3)

General comment	OPDC should be responsible for the determination of planning applications in North Acton	2	West Acton Residents' Association, 1 resident	No change proposed. The agreed Scheme of Delegation states that the determination of planning applications in North Acton will be delegated to Ealing Council to determine. Ealing Council are keen to ensure they continue to take a leading role in delivery of the regeneration of North Acton and OPDC is not proposing to amend this arrangement.
General comment	It is not clear whether the Plan proposes improvements within Kensal Rise	1	1 resident	No change proposed. The Local Plan does not cover Kensal Rise, but OPDC are working closely with Brent Council to ensure that regeneration in the OPDC area brings benefits to surrounding communities.
1. Introduction, Para 1.34	The introduction should also acknowledge the need for the existing community to have access to services and affordable housing within Old Oak, and for the business community to benefit from supply chain opportunities.	1	Brent Council	No change proposed. This is considered to be more of a policy issue than something that should be covered in the introduction chapter. These points are picked up in the strategic policies in chapter 3, specifically policies SP4 and SP5.
1. Introduction, Para 1.34	The introduction needs to acknowledge that without sufficient mitigation and integration the development could have a detrimental impact on the local area, by placing further pressure on the transport network and social infrastructure.	1	Brent Council	No change proposed. This is considered to be more of a policy issue than something that should be covered in the introduction chapter. These points are clarified as part of the strategic policies, specifically policies SP4, SP7 and SP10.

1. Introduction, Page 19, Figure 8	The key in Figure 8 should include Ealing Town Centre	1	Brent Council	Change proposed. Amendments have been made to the figures to include Ealing Town Centre, where relevant.
1. Introduction, Page 19, Figure 8	Harlesden Town Centre is listed in the key in Figure 8, but is shown in the figure of the forum area boundary. This needs reconciling.	1	Harlesden Neighbourhood Forum	Change proposed. The Reg 19 draft Local Plan includes the correct boundary for Harlesden Town Centre
1. Introduction, Page 15, Figure 6	Figure 6 is unclear as it appears to show separate strands of documents. This visual should be altered to show that all supporting studies will need to inform each other.	1	Historic England	Change proposed. The diagram will be revised so that it is clearer that they are not strands of documents but all documents that feed into the local plan
General comment	Concern that there will be a gap between the rhetoric of the Local Plan and the reality of what is built	1	Old Oak Interim forum	Noted. All Local Plan policies would be applied to development proposals in the area. However, issues such as viability do need to be recognised, in accordance with the National Planning Policy Framework (NPPF)
1. Introduction, Page 20	OPDC should be more explicit about supporting links between it and the Kensal Canalside Opportunity Area and recognise the role that a Crossrail station at Kensal Canalside would have in achieving both the Mayor's and the Council's ambitions for this area.	1	Royal Borough of Kensington and Chelsea	Change proposed. Text has been added to the supporting text to Policy SP1 and to the Local Plan Appendix to reference that RBKC has been lobbying for a Crossrail station and that this could further increase the area's development capacity.

1. Introduction, Page 20	The Local Plan should look to ensure that there are "no detrimental impacts from development" rather than looking to “mitigate any potential impacts” that might occur.	1	Royal Borough of Kensington and Chelsea	No change proposed. There are likely to be circumstances where impacts are unavoidable but that they are considered acceptable, subject to appropriate mitigation. The emphasis of the current wording is therefore considered sufficient, to allow for appropriate mitigations, whilst still according with the NPPF's presumption in favour of sustainable development.
General comment	There should be greater clarity about how long OPDC will be in existence for and what the arrangements would be when it is wound down	1	1 resident	No change proposed. The exact length of existence of OPDC is unknown so this cannot be explicitly referenced in the Local Plan. When OPDC is wound down, the three local boroughs would need to reincorporate the OPDC area into their Local Plans
1. Introduction	The Local Plan should provide more details about the areas context and its surroundings, including its communities	2	Residents	Change proposed. Further text has been added to Policy SP1 and the Local Plan Appendix to recognise the existing context. This maps local communities and facilities and provides historic context for the area.
General comment	Concern raised that developers only consideration is profit and they do not have the interests of the community at heart	2	Residents	Noted. This is not an issue for the Local Plan.
General comment	Concern raised that is developers that are getting excited about the development of the area and not the residents	1	Resident	Noted. This is not an issue for the Local Plan.

1. Introduction	There should be a distinction made between environmental controls generally and those that apply to HS2- the latter governed by the bill process.	1	HS2 Ltd	Change proposed. The High Speed Rail Act 2017 sets environmental controls for the HS2 development. The interdependencies with the High Speed Rail Act are set out in a new section in the introduction chapter.
General comment	Generally, we recommend that all Figures in the document relating to the Illustrative Masterplan which is included in the draft Local Plan need to be explicitly referenced as being 'Illustrative' for consistency purposes.	1	Old Oak Park (DP9)	Change proposed. There are no images of the illustrative masterplan in the Regulation 19 local Plan. The Local Plan Appendix clarifies that images in the Local Plan are indicative.
General comment	the Plan should cover Harlesden and Neasden as these areas are deprived and in need of regeneration	1	Resident	No change proposed. The OPDC boundary does not cover Harlesden or Neasden and OPDC therefore cannot set planning policy for these areas, but OPDC are working closely with Brent Council to ensure that regeneration in the OPDC area brings benefits to surrounding communities.
General	Scrubs Lane Masterplan and Victoria Road Masterplan Scrubs Lane Masterplan and Victoria Road Masterplan the Forum hopes to have the opportunity to contribute to these via the neighbourhood planning process.	1	Old Oak Interim Forum	Noted. OPDC consulted on these documents during their production. OPDC also plans to develop Supplementary Planning Documents for specific geographic areas in OPDC. These would undergo public consultation.
General	what could be done for the proposed residential areas to give them a 'quick win'	1	workshop attendee	Noted. Sites coming forward in the first few years of the Local Plan are likely to deliver land use which will benefit existing communities, such as new shops and cafes.

General	A resident asked is there an opportunity for the community to manage some spaces, e.g. like the Land Trust does?	1	workshop attendee	Change proposed. Policy DI3 promotes the potential for community ownership of assets.
General	Concern that family businesses would be priced out of the area.	1	workshop attendee	Noted. The Local Plan supports the protection of the Strategic Industrial Location (SIL). Policy E3 seeks to secure affordable workspace.
General	What exactly is there for existing residents who live here? How many years will the work go on? What compensation will be offered for all the hassle that will be encountered to existing residents during the build of this project.	1	Commonplace	No change proposed. The Local Plan supports the delivery of a new high quality place, which will deliver new homes and jobs to meet local and London-wide needs and supported by a range of ancillary uses, including new shops and infrastructure. Existing residents would benefit from the homes and jobs and new uses and infrastructure that this regeneration project provides. The Policies in the Local Plan look to appropriately mitigate the impacts of development, both during and post construction.
General	These "consultations" are a fraud. It's just done to tick the box. You have no intention to stop this stupid plan no matter what people say.	1	Commonplace	Noted. The Local Plan includes policies to secure the delivery of a high quality place. Consultation on the Reg 18 Local Plan was genuine and has resulted in a significant number of amendments in the Plan in response to comments made during the consultation.
General	Making a quick profit at the expense of current residents.		Commonplace	Noted. The Local Plan aims to appropriately secure benefits for wider communities, including new housing and affordable housing, jobs, town centre uses, including community facilities and new transport infrastructure and open space. This will all bring benefits to existing, as well as new residents.

General	Cancel the whole project. Take this crap and re-develop Belgravia instead.	1	Commonplace	No change proposed. The provision of the new Old Oak Common station provides the opportunity to deliver significant numbers of new homes and jobs in an area. The London Plan identifies Old Oak and Park Royal as Opportunity Areas, with the capacity to deliver a minimum 25,500 homes. As a Local Planning Authority, OPDC must produce a Local Plan. Westminster has its own Local Plan, which identifies the need to deliver over 20,000 homes over the next 20 years.
General	Zero tower blocks. Nothing over 3 stories high ever. Jail corrupt councillors and planning dept. officials.	1	Commonplace	No change proposed. The Local Plan identifies parts of the OPDC area as appropriate for high densities and tall buildings, given the areas public transport access. The Local Plan is supported by a Development Capacity Study, which shows how development can be sustainably optimised to contribute to London's and local needs for new homes and jobs.
General	Cancel HS2 and this "mission"	1	Commonplace	No change proposed. HS2 is governed by its own Act of parliament and the merits or otherwise of the project are therefore not a consideration for this Local Plan.

2. Spatial vision, objectives and mission statement

Section of Local Plan comments relates to	Issue summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
Spatial Vision	The Spatial Vision should acknowledge and protect existing communities within and surrounding the OPDC area.	11	Hammersmith and Fulham Disability Forum, Dioceses of London, Grand Union Alliance, Old Oak Interim Forum, local authority (LBB, LBE or LBHF) and 6 residents	Change proposed. The Spatial Vision and narratives have been amended to refer to local communities.
Spatial Vision	Spatial Vision should be more explicit in setting out the Local Plan will ensure the surrounding communities will connect, integrate with, and benefit from the development at Old Oak and Park Royal, and how potential detrimental impacts will be mitigated.	13	12 residents, London Borough of Brent	Change proposed. The Spatial Vision and narratives have been amended to ensure surrounding communities will connect, integrate with, and benefit from the development.
Spatial Vision	The Spatial Vision should be based on the proposed Grand Union Alliance community based vision.	1	Grand Union Alliance,	Noted. The Spatial Vision and narratives have been amended to reflect elements of the GUA proposed vision in an appropriate format for a vision.
Spatial Vision	Amend vision to include: The OPDC area has exemplar, sustainable, well-connected and walkable lifetime neighbourhoods supporting both new and long established residential communities, well linked with surrounding areas.	1	Hammersmith Society	Changed proposed. The Spatial Vision and narratives have been amended to ensure surrounding communities will connect, integrate with, and benefit from the development.

Spatial Vision	Amend vision to include: Local communities have been actively involved early in visioning and planning processes, and continue to play an active role in decision-making in the OPDC area, and this has been a major contributor to the OPDC's success.	1	Hammersmith Society	Noted. The Spatial Vision and narratives reflects the importance of community empowerment.
Spatial Vision	Sustainable communities are required.	2	Workshop attendees (residents)	Noted. The contents of the Spatial Vision and narratives aim to deliver sustainable communities
Spatial Vision	Vision should seek to ensure that Old Oak integrates with surrounding areas.	1	Hammersmith and Fulham Historic Buildings Group	Change proposed. The Spatial Vision and narratives have been amended to ensure surrounding communities will connect, integrate with, and benefit from the development.
Spatial Vision	The Spatial Vision: This should express an ambition for quality of place as well as delivery of large scale change. We suggest it is amended to read '… vibrant high quality neighbourhoods will help create a London destination recognised as an exemplar in attractive large-scale and employment-led regeneration'	1	Historic England	Change proposed. The Spatial Vision and narratives have been amended to clearly reference high quality design.
Spatial Vision	Not convinced that vision for Old Oak, in terms of jobs and housing, resonates with the views of young Londoners.	1	Midland Terrace Residents Group	Noted. The Spatial Vision and narratives have been amended to improve life chances and fairness. Engagement with young people was undertaken through the plan making process.
Spatial Vision	More emphasis should be placed on people, quality of life and their homes.	1	Midland Terrace Residents Group	Change proposed. The Spatial Vision and narratives have been amended to refer to local people, quality of life and new homes including affordable housing.

Spatial Vision	Support for development of Old Oak and Park Royal	3	National Bargee Travellers Association, The Inland Waterways Association, Unknown (Commonplace respondent)	Noted.
Spatial Vision	Spatial vision should have a people focus	1	Old Oak Interim Forum	Change proposed. The Spatial Vision and narratives have been amended to refer to local communities.
Spatial Vision	Broad support	3	Old Oak Park, Unknown (Commonplace respondent), Hammersmith and Fulham Historic Buildings Group	Noted.
Spatial Vision	Key diagram: make clear diagram is illustrative	1	Old Oak Park	Noted. Images will be defined as indicative within the Local Plan's glossary.
Spatial Vision	Spatial vision should support the delivery of a stadium as a catalyst use	1	QPR (NQP Development Services)	Noted. Specific reference to a stadium is not an appropriate for the overarching role of the vision. The narratives refer to the aspirations for the area to be a destination for people across London and the UK. Further guidance for catalyst uses is provided in policy SP6.
Spatial Vision	Broad support	2	Boropex Holdings Limited, QPR (NQP Development Services), Royal Borough of Kensington and Chelsea	Noted.

Spatial Vision	Key diagram – the site north of Stephenson Street and Goodhall Street as residential should be identified as residential with adjacent industrial units to the north east allocated as residential	1	Raban Management Ltd and Raban Goodhall Ltd	Change proposed. The existing residential units on Goodhall Street have been removed from SIL. Adjacent industrial units will continue to be designated as SIL.
Spatial Vision	The active rail depot at Willesden Junction should be designated as industrial.	1	TfL	No change proposed. The active rail depot will be safeguarded subject to further work undertaken to explore its retention, relocation and/or decking over.
Spatial Vision	Should include elements as referred to in previous OAPF comments on Vision relating to integrating requirements and creating an exciting and attractive place.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to connections and high quality place-making.
Spatial Vision	Should include elements as referred to in Previous OAPF comments on Vision relating to area's potential wider appeal. Welcome arts, leisure and cultural centres.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to the area's wider appeal as a destination specifically in relation to cultural uses.
Spatial Vision	Should include elements as referred to in Previous OAPF comments on Vision relating to densities, building heights and design standards.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to high quality design and high density. Further guidance for densities and building heights are provided in the strategic and place policies.
Spatial Vision	Should include elements as referred to in Previous OAPF comments on Vision relating to social infrastructure	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to providing social infrastructure to enhance day to day quality of life for local people.
Spatial Vision	Should include elements as referred to in previous OAPF comments on Vision relating to urban design and architecture and existing features.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to high quality design including social, cultural and built heritage assets.

Spatial Vision	Should include elements as referred to in previous OAPF comments on Vision relating to urban design and architecture and existing features.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to improving life chances and fairness.
Spatial Vision	Should include elements as referred to in previous OAPF comments on Vision relating to urban design and architecture and existing features.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to supporting the local economy including new workspaces.
Spatial Vision	Should include elements as referred to in previous OAPF comments on Vision relating to urban design and architecture and existing features.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to delivering green infrastructure.
Spatial Vision	Should include elements as referred to in previous OAPF comments on Vision relating to urban design and architecture and existing features.	2	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to connecting local people and delivering a new major transport hub for London.
Spatial Vision	Previous OAPF comments on Vision relating to catalyst uses and cultural hubs.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to supporting cultural uses.
Spatial Vision	Previous OAPF comments on Vision relating to recreational and sports facilities.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to providing sports and leisure facilities.
Spatial Vision	Previous OAPF comments on Vision relating to hard and soft landscaping.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to delivering green infrastructure.
Spatial Vision	Previous OAPF comments on Vision relating to phasing and impacts.	1	Hammersmith Society	No change proposed. Guidance relating to phasing and management of impacts is provided in policy SP10.
Spatial Vision	Commit to deliver high quality design	1	TITRA	Change proposed. The Spatial Vision and narratives have been amended to refer to delivering high quality design.

Spatial Vision	Refer to potential for mixed use development in current areas designated as SIL, including Scrubs Lane	1	Westkite Limited	No change proposed. SIL de-designation is not appropriate for the role of the Spatial Vision.
Spatial Vision	Vision is limited and bland and should be written by someone with creative skills	6	Local resident	Noted.
Spatial Vision	After ‘help create’ delete ‘a’ and’ add ‘an attractive’ before London destination….	2	Local resident	Change proposed. The Spatial Vision and narratives have been amended to deliver an attractive built environment.
Spatial Vision	A local resident was of the view that the term ‘innovation and growth sounds like a soundbite’	1	Local resident	Noted.
Spatial Vision	Vision should outline proposed positive changes	1	Local resident	Noted. The Spatial Vision and narratives sets out the proposed positive changes.
Spatial Vision	Include the term 'inclusiveness' or diversity	2	Local resident	Change proposed. The Spatial Vision and narratives sets out the aspiration for a diverse mix of uses, places and people.
Spatial Vision	New businesses should employ local people	1	Local Authority (LBB, LBE or LBHF)	Noted. The Spatial Vision and narratives set out the aspirations to improve the local economy.
Spatial Vision	Support for SMEs needed	1	Local resident	Noted. The Spatial Vision and narratives set out the aspirations to improve the local economy including new business growth.
Spatial Vision	Local manufacturing should be supported	1	Local resident	Noted. The Spatial Vision and narratives set out the aspirations to improve the local economy.
Spatial Vision	Contradicts objectives	1	Local resident	Noted. The Spatial Vision and narratives have been amended to ensure consistency.

Spatial Vision	Support for QPR stadium, vision should refer to a stadium, stadium will be a hub for the community and catalyst for wider development	28	Local resident	Noted. Specific reference to a stadium is not an appropriate for the overarching role of the vision. The narratives refer to the aspirations for the area to be a destination for people across London and the UK. Further guidance for catalyst uses is provided in policy SP6 and policy TCC8.
Spatial Vision	Support for mixed use development	1	The London Forum	Noted.
Spatial Vision	Consider adding affordable houses and efficient and green energy	1	Unknown - Commonplace respondent	Change proposed. The Spatial Vision and narratives have been amended to refer to delivering affordable housing and sustainable development.
Spatial Vision	Add in both vision and mission that the new homes will be affordable for the many residents, sustainable energy and types of industrial uses	1	Unknown - Commonplace respondent	Change proposed. The Spatial Vision and narratives have been amended to refer to delivering affordable housing, sustainable development and improvements to industrial Park Royal.
Spatial Vision	Stations should be located as close as possible together	2	Unknown - Commonplace respondent	Noted.
Spatial Vision	Implement vision and mission statement	2	Unknown - Commonplace respondent	Noted.

Spatial Vision	Objectives should refer to providing social infrastructure to meet need	1	Unknown - Commonplace respondent	Change proposed. The Spatial Vision and narratives have been amended to providing social infrastructure to enhance day to day quality of life for local people.
Spatial Vision	Object to regeneration	2	Unknown - Commonplace respondent	Noted.
Objectives	The Objectives should acknowledge the needs and aspirations of existing communities including integrating with surrounding neighbourhoods	4	Resident, Hammersmith Society, Grand Union Alliance, Harlesden Neighbourhood Forum	Change proposed. The Spatial Vision and narratives have been amended to ensure surrounding communities will connect, integrate with, and benefit from the development.
Objectives	Amend Objective 5 to insert “accessible and inclusive” between “of” and “design”	1	Hammersmith and Fulham Disability Forum	Noted. The Spatial Vision and narratives refer to the delivery of high quality design. Accessible and inclusive design is considered to be an important component element of high quality design. Policies SP2 and SP8 state this. Policy D3 provides detailed guidance for delivering accessible and inclusive design.
Objectives	Communities comes last in a list of four overall objectives.	2	Midland Terrace Residents Group, Old Oak Interim Forum	Noted. The narratives have been developed to emphasise local people and communities.
Objectives	Welcome reference to lifetime communities and health and wellbeing.	1	Midland Terrace Residents Group	Noted.
Objectives	Provide an additional objective reflecting: The need for effective community and business involvement in developing the proposals and inhabiting the new development	1	Hammersmith Society	Noted. The Spatial Vision and narratives set out the aspirations to improve the local economy. Policy D1 provides guidance for ensuring proposed developments engage with future users, including employment uses.

Objectives	Objectives should reference need to redevelop Willesden Junction station	1	London Borough of Brent	No change proposed. The Spatial Vision and narratives set out the aspirations to establish Old Oak as a major transport hub and to connect local people. Detailed guidance for improving Willesden Junction station is provided in policies P11 and P11C1.
Objectives	Agree with Objective 4 to Celebrate existing features of the Grand Union Canal, Wormwood Scrubs, Park Royal, heritage assets, and local communities to help create a unique sense of place.	1	Friends of Wormwood Scrubs	Noted. This aspiration has been reflected in the amended Spatial Vision and narratives.
Objectives	Amend objective 4 to include 'A highly beneficial relationship between Old Oak Common and the nationally important historic landscape of Kensal Green Cemetery will be sought recognising the significance of this heritage asset and the contribution it will make to the local community now, and in the future'.	1	Historic England	Change proposed. The narratives have been amended to refer to Kensal Green Cemetery.
Objectives	Amend objective 7 to state ' .... deliver social, environmental and economic benefits for local communities and foster a sense of community identity and diversity'	1	Historic England	Change proposed. The Spatial Vision and narratives have been amended to refer to delivering benefits for local people, diversity and life chances.
Objectives	Objective 1: Inflexible zoning of Park Royal can have damaging consequences on creating sustainable communities.	2	Midland Terrace Residents Group, Old Oak Interim Forum	No change proposed. OPDC's Industrial Land Review (2016) sets out the evidence for protecting the SIL designation. Where appropriate, policies will refer to the need to protect the amenity of residents while supporting the functioning of uses within SIL.

Objectives	Objective 6: Limited evidence on how the Local Plan will be flexible and adaptable.	2	Midland Terrace Residents Group, Old Oak Interim Forum	No change proposed. Flexibility and adaptability in relation to climate change is reflected by the aspiration to be an exemplar in sustainable large-scale development. This approach has been further defined in the Environment and Utilities Chapter of the next version of the Local Plan. OPDC's Environmental Standards Study provides evidence for this approach.
Objectives	Objective 7: Welcome the inclusive of Objective 7 and references throughout the document on health and wellbeing. However, further clarification is needed on how this will be co-ordinated across the OPDC area.	1	NHS London Healthy Urban Development Unit	Noted. The Spatial Vision and narratives continue to reflect the need to support the health and well-being of local people. The Town Centre and Community Uses Chapter, Delivery and Implementation Chapter and OPDC's Infrastructure Delivery Plan provide further detail for coordination.
Objectives	Objective 7: Under Communities the reference to lifetime communities is welcomed, as well as the references to health and wellbeing.	1	Old Oak Interim Forum	Noted.
Objectives	Broad support	4	Old Oak Park, Royal Borough of Kensington and Chelsea, Unknown (Commonplace respondent), Hammersmith and Fulham Historic Buildings Group	Noted.

Objectives	Objectives should support the delivery of a stadium as a catalyst use	1	QPR (NQP Development Services)	Noted. Specific reference to a stadium is not appropriate for the overarching role of the vision. The narratives refer to the aspirations for the area to be a destination for people across London and the UK. Further guidance for catalyst uses is provided in policy SP6 and TCC8.
Objectives	Objective 2: suggest this recognises the enhancement opportunity from part of London's Blue Ribbon network running through the area: ' … will catalyse comprehensive regeneration with well-designed streets and attractive canal corridor enhancement that will fully connect into surrounding areas'	1	Historic England	No change proposed. The Spatial Vision and narratives continues to refer to improving the Grand Union Canal. Policy P3 refers to the need for development to deliver the Mayor's aspirations for the Blue Ribbon Network.
Objectives	Objectives 4: suggest that that this should be worded 'Celebrate and respond to features …' to address this point, reflecting paras 58-61 of the NPPF.	1	Historic England	No change proposed. The Spatial Vision and narratives now refer to conserving and enhancing heritage assets to ensure consistency with the NPPF. Policy D8 provides further guidance in relation to heritage.
Objectives	Objective 2: emphasise links between transport hubs in objectives.	1	QPR (NQP Development Services)	No change proposed. The Spatial Vision and narratives refer to the aspiration for establishing Old Oak as a major transport hub. Relevant place policies set out guidance for connecting transport hubs, including along Old Oak High Street.
Objectives	Objective 2: should reference need to connect to Kensal Canalside Opportunity Area	1	Royal Borough of Kensington and Chelsea	No change proposed. The Spatial Vision and narratives refer to new development connecting surrounding neighbourhoods. Kensal Canalside is considered to be one of these neighbourhoods. Policy P10 sets out supporting guidance for specifically connecting with Kensal Canalside.

Objectives	Objectives should include the need to balance global city and local aspirations.	1	Hammersmith Society	Change proposed. The Spatial Vision narratives are structured to define London and UK aspirations and local aspiration to deliver a balanced approach.
Objectives	Objectives should include the need to the need to protect existing facilities/uses and achieve a good balance and land uses.	1	Hammersmith Society	No change proposed. Managing existing facilities and uses is considered to be appropriate for policies rather than the spatial vision. Policy TCC4 provides guidance for this.
Objectives	Objectives should include the need to deliver walkable and connected places through a hierarchy of connections.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives are being amended to deliver a high quality and healthy built environment that connects local communities and neighbourhoods.
Objectives	Objectives should use lessons learnt elsewhere including in relation to tall buildings.	1	Hammersmith Society	No change proposed. The Spatial Vision and narratives set out the aspiration for delivery high quality design. This includes tall buildings. Policy D4 provides guidance for well-designed buildings. D5 provides guidance for tall buildings.
Objectives	Objectives should include that OPDC will adopt all roads	1	Hammersmith Society	Noted. Although not appropriate for inclusion in the spatial vision, OPDC will continue to liaise with the relevant local highway authorities to agree an approach to adopting routes. This is clarified in policy T1.
Objectives	Objectives should include reference to the need to be flexible	1	Hammersmith Society	Noted. The Spatial Vision and narratives are considered to be appropriately flexible.
Objectives	Objectives should include the need to delivery best practice development for infrastructure and sustainability	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to reflect the aspiration for Old Oak and Park Royal to be an exemplar in healthy and sustainable development.

Objectives	Objectives should recognise the role of the Grand Union Canal as an open space, leisure uses and as a heritage asset	1	Hammersmith Society	Noted. The narratives refer to the Grand Union Canal as an environmental and heritage asset. Policy P3 provides specific guidance for the Grand Union Canal.
Objectives	Objectives should include the importance of the retention and limited enhancement of Wormwood Scrubs as important open space for the enjoyment of local people as a nature reserve and its many sporting activities.	1	Hammersmith Society	Noted. The Spatial Vision and narratives refer to Wormwood Scrub's role as protected Metropolitan Open Land and the need to continue its role as a district and metropolitan park.
Objectives	Create high quality liveable and inclusive sustainable neighbourhoods	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives are being amended to reflect the aspiration to deliver a high quality built environment and to be an exemplar in sustainable development. These elements are considered to include liveability.
Objectives	Housing targets to be reconsidered to meet local needs and delivery medium densities	2	Hammersmith Society, local resident	No change proposed. OPDC's Strategic Housing Market Assessment defines the housing need for the housing market area. OPDC's Development Capacity Study sets out the capacity for housing based on existing policy guidance and precedents of comparable developments. This identifies that high densities are appropriate for Old Oak.
Objectives	Deliver housing with a range of long-term secure tenures	1	Hammersmith Society	Noted. The Spatial Vision and narratives set out the aspiration to deliver a mix of new homes including affordable housing for local people. The length of tenures is considered to be outside the scope of the Local Plan; however policy H2 sets out the need to deliver affordable housing in perpetuity.

Objectives	Deliver social housing that is indistinguishable from other tenures	1	Hammersmith Society	Noted. The Spatial Vision and narratives set out the aspiration to deliver a mix of new homes including affordable housing for local people. Policy H2 provides guidance for ensuring affordable housing is designed to the same quality of external appearance as market housing
Objectives	Provide homes that exceed the Mayor of London's minimum space standards and meet lifetime standards.	1	Hammersmith Society	Noted. The supporting text for policy H3 states that all self-contained housing units will be required to meet the London Plan and national housing space standards.
Objectives	Displacement and monitoring of existing businesses	3	Hammersmith Society, local residents	Noted. OPDC is working with local businesses to understand how it can support and monitor the impacts of development. Further information will be defined in OPDC reporting and monitoring publications.
Objectives	Provide appropriate mixed uses at the ground floor level of housing developments	1	Hammersmith Society	Noted. Place policies provide guidance for the location of mixed-use development.
Objectives	Retain public land for publicly owned development	1	Hammersmith Society	Noted. OPDC is working with public sector land owners to consider how to manage publicly owned land.
Objectives	Integrate adequate provision of social & community facilities within housing developments.	1	Hammersmith Society	Noted. Policy TCC4 provides guidance for delivering social infrastructure.
Objectives	Locate dedicated new open space within and adjacent to housing developments.	1	Hammersmith Society	Noted. Policy EU1 provides guidance for the delivery of open spaces. Place policies provide guidance for the location of publicly accessible open spaces.
Objectives	Protect and enhance existing green and play spaces.	1	Hammersmith Society	Noted. Policy EU1 provides general guidance for protecting existing open spaces. Place policies provide guidance for specific existing open spaces.

Objectives	Create adequate new green spaces to meet the required standards for the new developments that exclude the Scrubs from any such calculations.	1	Hammersmith Society	Noted. Policy EU1 provides guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area outside of SIL as publicly accessible open space. This excludes Wormwood Scrubs.
Objectives	Include separate routes and spaces for walking, cycling, private and public vehicles in all streets and public realms and ensure any essential road, pedestrian and cycle 'tunnels' are spacious and provide a secure, safe environment.	1	Hammersmith Society	Noted. Policies SP7 and T1 provide general guidance for delivering high quality routes. Place policies provide spatial guidance for specific routes.
Objectives	Balance permeability and legibility with creation of neighbourhoods which have a sense of community ownership and security	1	Hammersmith Society	Noted. Permeability and legibility are supported across the OPDC area. The Spatial Vision sets out aspirations for delivering a sense of ownership. Policy SP2 provides guidance for deliver lifetime neighbourhoods.
Objectives	Balance the provision of essential local services and retail with those dedicated to the potentially lucrative activities, to service high footfalls.	1	Hammersmith Society	Noted. Policies SP6 and TCC1 provide guidance for delivering a hierarchy of town centres to serve the needs of the development and existing communities while complementing surrounding town centres
Objectives	Protect and safeguard existing green spaces alongside the canal	1	Hammersmith Society	Noted. Policy EU1 provides general guidance for protecting existing open spaces. Policy P3 provide guidance for specific existing canalside open spaces.
Objectives	Work with neighbouring boroughs to create green infrastructure	1	Hammersmith Society	Noted. Through the Duty to Cooperate, OPDC will continue to work with the boroughs to deliver green infrastructure.
Objectives	Record, retain and integrate valued buildings and features of local merit and historic interest	1	Hammersmith Society	Noted. Policy D8 provides guidance for conserving and enhancing the historic environment.

Objectives	Drawn on local history to define street names and heritage activities.	1	Hammersmith Society	Noted. OPDC's Heritage Strategy provides local historic information which has been used to inform street and area names (including Acton Wells and Laundry Lane).
Objectives	Understand the distinctiveness and integrity of existing Conservation Areas so that they may be preserved and enhanced.	1	Hammersmith Society	Noted. Policy D8 provides guidance for conserving and enhancing the historic environment. OPDC established its first conservation area at the Cumberland Park Factory in February 2017. Further work on other new and existing conservation areas will be carried out from later in 2017.
Objectives	Provide exceptionally high standard of architecture and environmentally friendly design and set challenging targets for lifetime embodied carbon emissions.	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives are being amended to refer to delivering high quality design. Policies D2 and D4 provide further guidance for design.
Objectives	Consideration be given to the appointment of a design champion to set and oversee design standards throughout the OPDC area.	1	Hammersmith Society	Noted. OPDC makes use of the Place Review Group to independently review relevant development proposals and planning policy documents.
Objectives	Create adaptable and imaginative buildings that are designed to last for 150 years and use best materials and techniques in terms of sustainability.	1	Hammersmith Society	Noted. The Spatial Vision and narratives set out the aspiration to deliver a high quality and sustainable built environment. Policy SP6 and the Design Chapter policies provide guidance for delivering this aspiration.
Objectives	Promote retrofitting of existing homes, businesses and other premises.	1	Hammersmith Society	Noted. The Spatial Vision and narratives set out the aspiration to deliver a sustainable built environment. Policy EU7 provides guidance supporting the Circular Economy to deliver these aspirations.
Objectives	Fully integrate environmental infrastructure	1	Hammersmith Society	Noted. The Spatial Vision and narratives set out the aspiration to deliver a sustainable built environment. The Environment and Utilities Chapter provides guidance for delivering green infrastructure.

Objectives	Relocate waste sites to Park Royal.	1	Hammersmith Society	Noted. OPDC is proposing to retain and improve Old Oak Sidings Waste Management Facility. Other waste sites will be managed by guidance set out in policy EU6.
Objectives	Encourage standardisation and co-ordination of procedures around waste and recycling	1	Hammersmith Society	Noted. Guidance for waste management is provided in policy EU6.
Objectives	Deliver building heights in range from 5 to 10 storeys except where tower heights are warranted.	1	Hammersmith Society	No change proposed. A range of building heights will likely be required responding to site specific circumstances including access to public transport and proximity to sensitive locations. Policy SP9 and place policies provide guidance for building heights.
Objectives	Sustain the character of existing and stable residential neighbourhoods through avoidance of high rise development. Harmonise the siting, scale, bulk and height of new development to sensitive locations and views.	1	Hammersmith Society	No change proposed. A range of building heights will likely be required responding to site specific circumstances including access to public transport and proximity to sensitive locations. Policy SP9 and place policies provide guidance for building heights.
Objectives	Sustain and evolve economic activities and employment in existing industry of the Strategic Industrial Location (SIL) of Park Royal	1	Hammersmith Society	Noted. The Spatial Vision and narratives seek to continue to support and enhance Park Royal Strategic Industrial Location.
Objectives	Sustain and enhance existing valued services	1	Hammersmith Society	Noted. The Spatial Vision and narratives seek to enhance day to day quality of life for local people including social infrastructure provision. Policy TCC4 provides guidance for delivering this aspiration.
Objectives	Maximise potential spin off from existing and new academic centres	1	Hammersmith Society	Noted. The Spatial Vision and narratives seek to pioneer international excellence in sustainability, health and well-being and design quality. Policies SP2 and EU11 set out

				aspiration to work with higher education providers.
Objectives	Support development of new incubator light industrial units.	2	Hammersmith Society, TITRA	Noted. The Spatial Vision and narratives seek to continue to support the local economy and Park Royal through innovative growth. This is considered to include incubator light industrial units.
Objectives	Encourage development of further education facilities to support apprenticeship schemes	1	Hammersmith Society	Noted. The Spatial Vision and narratives seek to improve life chances and fairness for communities. Policy TCC4 provides guidance for delivering this aspiration.
Objectives	Protect industrial premises and affordable business units	1	Hammersmith Society	Noted. The Spatial Vision and narratives seek to continue to support the local economy and Park Royal. Policy E1 and E3 provide guidance for affordable workspace.
Objectives	Replaced relocated waste sites with appropriate employment and training facilities	1	Hammersmith Society	No change proposed. Guidance for waste management is provided in policy EU6.
Objectives	Set targets for the net total of new jobs to be delivered	1	Hammersmith Society	Noted. Job capacity and targets are defined in OPDC's Development Capacity Study and set out in SP5.
Objectives	At least 30% of jobs should be for local people with a target of at least 30% during construction phases and 30% longer term.	1	Hammersmith Society	Noted. Policy E5 provides guidance for securing local access to training, employment and economic opportunities.
Objectives	Provide local skills training	1	Hammersmith Society	Noted. Policy E5 provides guidance for securing local access to training, employment and economic opportunities.

Objectives	Provide a breakdown of jobs delivered.	1	Hammersmith Society	Noted. This will be delivered through future monitoring of the delivery of the Local Plan and wider OPDC reporting.
Objectives	Consider impact of displaced businesses in Park Royal	1	Hammersmith Society	Noted. OPDC will continue to work closely with existing businesses.
Objectives	Protect or re-provide premises for valued local social and community activities and assets	1	Hammersmith Society	Noted. The Spatial Vision and narratives seek to improve life chances and fairness for communities. Policy TCC4 provides guidance for delivering this aspiration.
Objectives	Development or its construction must not impact the character or encroach onto Wormwood Scrubs or impact negatively on views from the Scrubs or its natural environment and wildlife. Greater emphasis should be provided.	2	Hammersmith Society	Noted. Policy EU1 provides guidance for protecting open spaces. Policy P12 provides specific guidance for protecting and enhancing Wormwood Scrubs.
Objectives	Sensitively enhance the ecology and as an area for exercise and recreation with agreement and support by the WS charitable trust;	1	Hammersmith Society	Noted. Policy EU2 provides guidance for managing biodiversity. Policy P12 provides specific guidance for protecting and enhancing Wormwood Scrubs.
Objectives	Prevent any route from HS2 Station direct to the Scrubs	1	Hammersmith Society	No change proposed. To support people accessing Wormwood Scrubs in accordance with the Wormwood Scrubs Act, new walking and cycling routes from the station and other locations from Old Oak South and North are proposed. This is set out in Policies P1, P2 and P12.
Objectives	Protect and enhance established green spaces alongside the canal.	1	Hammersmith Society	Noted. Policy EU1 provides general guidance for protecting existing open spaces. Policy P3 provide guidance for specific existing canalside open spaces.

Objectives	Carry out a full survey of the existing buildings along the canal	1	Hammersmith Society	No change proposed. OPDC's Heritage Strategy provides an analysis of canal related heritage. This has informed relevant place policies.
Objectives	Create publicly accessible public facilities that utilise and enhance the existing heritage, including a canoe club along the canal.	1	Hammersmith Society	Change proposed. Policy EU1 and place policies provide guidance for the location of canalside public spaces.
Objectives	Create a new cultural hub/arts centre within the OPDC area	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives have been amended to refer to the area's wider appeal as a destination specifically in relation to cultural uses.
Objectives	Create facilities for recreation and physical exercise	1	Hammersmith Society	Change proposed. The Spatial Vision and narratives will be amended to refer to providing sports and leisure facilities.
Objectives	Set back development from the edge of the canal at no more than two or three storeys	1	Hammersmith Society	No change proposed. A range of building heights will be required along the canal responding to site specific circumstances including access to public transport, key routes and to respond to the heritage and biodiversity designations of the canal.
Objectives	Provide segregated cycling and pedestrian routes including on the canal tow path.	1	Hammersmith Society	No change proposed. OPDC's Public Realm, Walking and Cycling Strategy identifies that the southern tow path should be a shared walking and cycling route to support local connectivity and respond to the canalside environment.
Objectives	Encourage new basins, side docks and wharfs	1	Hammersmith Society	Change proposed. P3 has been amended to support new waterspaces.
Objectives	Ensure that where possible bridges over the canal are light and pedestrian only.	1	Hammersmith Society	No change proposed. OPDC's Public Realm, Walking and Cycling Strategy identifies the need for a range of bridges, including those to support all surface transport modes.

Objectives	Exploit potential for use of the canal for transportation of building materials	1	Hammersmith Society	No change proposed. Policies T7 and T8 continued to support sustainable construction transport via the canal.
Objectives	Develop a strategy of very high quality hard and soft landscaping throughout the OPDC area.	1	Hammersmith Society	Noted. Policy EU2 provides guidance for delivering urban greening. Relevant place policies provide spatial guidance for open spaces.
Objectives	Clearly analyse and plan for the differing transport requirements to address existing issues, relieve pressure on Scrubs Lane and Old Oak Common Lane while rationalising the scale, complexity and cost of transport infrastructure.	2	Hammersmith Society	No change proposed. OPDC's Public Realm, Walking and Cycling Strategy, Old Oak Strategic Transport Strategy and the Scrubs Lane Development Framework provide recommendations for support movement in and around the area. SP7, place polices and the Transport Chapter reflect these recommendations in guidance.
Objectives	Involve community members in the planning of bus routes.	3	Hammersmith Society	No change proposed. This is considered to be beyond the scope of the Local Plan.
Objectives	Encourage use of public transport	4	Hammersmith Society	Noted. Policy SP7 supports the use of public transport.
Objectives	Provide clear and accessible information and signage	5	Hammersmith Society	Noted. Policy T1 provides guidance for supporting local legibility.
Objectives	Provide contingency plans in the event that HS2 does not go ahead.	6	Hammersmith Society	No change proposed. The HS2 London-Midlands Act gained Royal Ascent in February 2017.
Objectives	Prevent any rail links being close to bedroom windows of residential buildings.	7	Hammersmith Society	Noted. Policy D6 provides guidance for protecting residential amenity.
Objectives	Ensure the high street is accessible only to pedestrians and cyclists with certain essential sections being accessible to buses.	8	Hammersmith Society	No change proposed. To support local and sub-regional movement, OPDC's Public Realm, Walking and Cycling Strategy identifies the preferred approach for Old Oak High Street to provide access to public transport services alongside other appropriate vehicles.

Objectives	Emphasis on aspiration to create high density mixed use neighbourhood on Scrubs Lane	1	Westkite Limited	No change proposed. Policy P10 continues the aspirations to deliver a mix of uses including employment along Scrubs Lane.
Objectives	Support creating objective	1	Unknown	Noted
Objectives	Add specific objectives regarding services for elder residents, hospitals, schools, employment and affordable houses	1	Unknown - Commonplace respondent	Changes proposed. The Spatial Vision and narratives have been amended to improve life chance and ensure local people benefit from development. This includes local employment, affordable homes and other housing uses.
Objectives	Support proposals for cycling infrastructure	1	Unknown - Commonplace respondent	Noted. This is covered in Local Plan policy T3.
Objectives	Objectives should delivery job opportunities for local people	1	Unknown - Commonplace respondent	Noted. Policy E5 provides guidance for securing local access to training, employment and economic opportunities.
Mission Statement	The OPDC mission statement should include explicit reference to supporting the existing community and businesses, not just to participate, but to actively benefit from the regeneration of Old Oak and Park Royal.	2	Resident, London Borough of Brent	Noted. The Mission Statement has been removed with content included within the Spatial Vision and narratives. The Spatial Vision and narratives have been amended to ensure surrounding communities will connect, integrate with, and benefit from the development.
Mission Statement	It would be beneficial for the mission statement to include reference to achieving the 'highest standards of design and sustainability', to be consistent with the wider objectives of the Local Plan.	1	London Borough of Brent	Noted. The Mission Statement has been removed with content included within the Spatial Vision and narratives. The Spatial Vision and narratives have been amended to pioneer international excellence in sustainability, health and well-being and design quality to deliver tangible benefits for both local communities and London.

Mission Statement	The second bullet point should end 'ensuring the highest standards of INCLUSIVE design?' Or 'design, particularly inclusive design'	1	GLA	Noted. The Mission Statement has been removed with content included within the Spatial Vision and narratives. The Spatial Vision and narratives refer to the delivery of high quality design. Accessible and inclusive design is considered to be an important component element of high quality design. Policies SP2 and SP8 state this. Policy D3 provides detailed guidance for delivering accessible and inclusive design.
Mission Statement	There should be more engagement with young people in consultation	1	Hammersmith and Fulham Urban Studies Centre	Noted. The Mission Statement has been removed with content included within the Spatial Vision and narratives. OPDC's Statement of Community Involvement sets out the approach for engagement with local people including those with protected characteristics as defined by the Equality Act (2010). This includes age.
Mission Statement	We strongly welcome the commitment in the first bullet to pursue best practice in planning development that complements the wider area, and suggest that 'including its heritage' is added to the end.	1	Historic England	Noted. The Mission Statement has been removed with content included within the Spatial Vision and narratives. The Spatial Vision and narratives identify the need to conserve and enhance the area's heritage assets.
Mission Statement	In the same vein, we also welcome the intention to achieve the highest design standards, as is advocated in paras 58-61 of the NPPF.	1	Historic England	Noted. The Mission Statement has been removed with content included within the Spatial Vision and narratives. Delivering high quality design is continued into the updated Spatial Vision and narratives.
Mission Statement	Broad support	2	Old Oak Park, Hammersmith and Fulham Historic Buildings Group	Noted. The Mission Statement has been removed with content included within the Spatial Vision and narratives.

Mission Statement	Should state that working with stakeholders can facilitate early delivery and provide 'catalyst facilities around which development can grow'.	1	QPR (NQP Development Services)	Noted. The Mission Statement has been removed with content included within the Spatial Vision and narratives. The approach to facilitating development is set out in the Delivery and Implementation Chapter. The Spatial Vision and narratives set out the aspiration for the area to become a destination. This is supported by policy SP6 providing guidance to destination and catalyst uses.
Mission Statement	Bullet point 3: At the end of the 'regeneration potential' add '- and ensure it integrates constructively with regeneration activity in surrounding areas' or similar.	1	Local resident	Noted. The Mission Statement has been removed with content included within the Spatial Vision and narratives. The Spatial Vision and narratives have been amended to ensure surrounding communities will connect, integrate with, and benefit from the development.
Mission Statement	Add the word enjoyable - "Enable the delivery of an enjoyable liveable new place for a mix of residents, employees and visitors, ensuring new development achieves the highest standards of design	1	Unknown - Commonplace respondent	Noted. The Mission Statement has been removed with content included within the Spatial Vision and narratives. The Spatial Vision and narratives refer to people enjoying the area.
Mission Statement	Object to Mission Statement	1	Unknown - Commonplace respondent	Noted.

3. Strategic Policies

Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
3. Overarching Spatial Policies, Policy OSP2	OPDC should try and ensure that local businesses can benefit from procurement opportunities during the construction of the development	1	Local business	Change proposed. OPDC has inserted wording in Policy SP5 to reference the need for local procurement opportunities and Policy E5 requires a Local Labour, Skills and Employment Strategy and Management Plan.
3. Overarching Spatial Policies, Policy OSP5	OPDC should commit strongly to working with existing local residents and businesses and being transparent and open	6	Midland Terrace Residents Association, Andy Slaughter MP, Old Oak Interim Forum, 3 residents, 1 university representative	Change proposed. Policy SP2 now references OPDC's SCI which sets out OPDC's approach to working with residents and businesses and approach to transparency. The Delivery and Implementation policy DI3 also highlights the importance of communities in shaping the development of the area.
3. Overarching Spatial Policies	The overarching spatial policies do not adequately convey the role of OPDC as an exemplar in sustainable development.	3	London sustainable Development Commission, 2 residents	Change proposed. Amendments have been made to the strategic policies and Policy SP2 now references the aspiration for the OPDC area to be an environmental exemplar.

3. Overarching Spatial Policies, Policy OSP5	The Local Plan should reference the role of local stakeholders, charities, specialist groups such as the London Disability Forum, community groups and businesses have to play in helping to knit together communities and overcome severance.	1	Queen's Park Rangers FC, Greater London Authority	Change proposed. Policy SP2 now references OPDC's SCI which sets out OPDC's approach to working with residents and businesses and approach to transparency. The Delivery and Implementation policy DI3 also highlights the importance of communities in shaping the development of the area.
3. Overarching Spatial Policies, Policy OSP2	How the homes and jobs targets in the Local Plan were arrived at should be made clearer and question the homes and jobs target in the London Plan and request that OPDC undertake further work to assess whether the London Plan figures are appropriate.	7	TITRA, Diocese of London, Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, the Hammersmith Society, Wells House Road Resident's Association, 1 resident	No change proposed. The OPDC Local Plan is required to be general conformity with the London Plan and the minimum housing targets for Old Oak and Park Royal. Further work has been undertaken as part of OPDC's Development Capacity Study to test the appropriateness of housing targets in the Local Plan. The Development Capacity Study has been undertaken in accordance with national policy guidance. The Development Capacity Study work has informed the revised targets in the Regulation 19 draft Local Plan. The acceptability of any specific development proposal would be judged against the policies in the Local Plan, which includes policies which ensure that design is of a high quality and is in accordance with the principles of sustainable development.
3. Overarching Spatial Policies, Policy OSP2	It should be made clear that the homes and jobs targets are minimum figures	2	Aurora Developments Ltd, Old Oak Park (DP9)	Change proposed. The Local Plan has been amended to make it clear that the homes and jobs targets are minimum figures.
3. Overarching Spatial Policies, Policy OSP2, figure 13	Figure 13 should include the proposed location of open spaces	1	Brent Council	No change proposed. It is not appropriate for land use plans to highlight the location of proposed open space. The proposed location of open spaces are shown in the figure associated with the green infrastructure and open space policy (SP8).

3. Overarching Spatial Policies, Policy OSP5	Requiring 'proposals over a certain size' to submit a meanwhile strategy is too vague. A threshold should be set and the policy should set out what a meanwhile strategy would need to cover	1	Brent Council, Old Oak Park (DP9)	Change proposed. Policy TCC9 now sets a threshold for requiring a meanwhile feasibility study and strategy. The threshold is major development proposals, which are defined in the Local Plan's glossary.
3. Overarching Spatial Policy, Policy OSP1	Figure 12 is incorrect: Lakeside Drive is drawn too far to the west and therefore suggests that part of the First Central site falls within the Origin industrial site to the east.	2	Diageo Plc, Segro	Change proposed. All figures in the new Local Plan have been revised to remove the industrial area to the east from being shown as residential.
3. Overarching Spatial Policy, Policy OSP1	The entire First Central site should be identified as appropriate for mixed uses and not just the southern part of the site	1	Diageo Plc	No change proposed. Most of the site has been recently developed for residential. It is not considered appropriate to support the redevelopment of these recently constructed buildings.
3. Overarching Spatial Policy, Policy OSP5, QOSP5c	Willesden Junction could be identified as a separate place as it will be an important gateway and will see significant change.	5	Diocese of London, Old Oak Park (DP9), 3 residents	Change proposed. The Local Plan has been amended and identifies Willesden Junction as a separate place with its own policy.
3. Overarching Spatial Policies, Policy OSP5	Support the need to celebrate existing features identified in Policy OSP5b	1	Friends of Wormwood Scrubs	Noted. The need to respond to local character and context, contribute positively to a locally distinctive townscape and conserve and enhance the historic environment and heritage assets and ensures these help shape local identity, has been incorporated into Policy SP9.
3. Overarching Spatial Policies, Policy OSP5	Welcome reference to lifetime neighbourhoods	3	Greater London Authority, Midland Terrace Resident's Group, Old Oak Interim Forum	Noted.

3. Overarching Spatial Policies, Policy OSP2	Support homes and jobs targets	2	Harlesden Neighbourhood Forum, Westkite Ltd	Noted.
3. Overarching Spatial Policies, Policy OSP1	Support Policy OSP1	6	Heathrow, Historic England, Old Oak Park (DP9), Farrells, Royal Borough of Kensington and Chelsea, Hammersmith and Fulham Historic Buildings Group, Westkite Ltd, 1 resident	Noted. Policy OSP1 has now been incorporated into parts of policies SP1, SP2, SP3, SP4, SP5, SP9 and SP10.
3. Overarching Spatial Policies, Policy OSP3	The policies should go further and recognise in particular the Grand Union Canal and Kensal Cemetery as assets more fully for their strategic value and positive opportunities.	1	Historic England	Change proposed. The supporting text to Policy SP8 now references the importance of these assets.
3. Overarching Spatial Policies, Policy OSP5	Amend wording of OSP5 b) to 'Celebrate and respond to existing features within and close to the plan area including the Grand Union Canal, Wormwood Scrubs, historic Kensal Green Cemetery and other designated and undesignated heritage assets …'	1	Historic England	Change proposed. Policy SP9 references the need to respond appropriately to the setting of heritage assets, open spaces and residential communities. Policy D8 addresses designated and undesignated heritage assets

3. Overarching Spatial Policies, Policy OSP2	Release of SIL at Brunel Road is not supported	1	Ealing Council	No change proposed. OPDC's Industrial Land Review outlines that the release of this site is acceptable so long as industrial uses are intensified in the SIL. OPDC's Intensification Study shows how this intensification can be achieved and the intensification in SIL is supported in Policy SP5. Policy E1 also looks to retain existing employment uses outside of SIL and support businesses relocation, where this is not feasible or appropriate.
3. Overarching Spatial Policies, Policy OSP1	Do not agree with the approach to optimising growth. The Local Plan does not set out why an alternative approach to 'optimising growth' would not be consistent with the NPPF. An alternative approach should be considered	2	Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. Optimising development, in a sustainable manner, is a core strand to the NPPF. It is a requirement of Local Plans to ensure that that development achieve this, as set out in para 58 of the NPPF.

				No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Officers consider that taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. Officers support the potential for a mix of land uses in Old Oak and this is reflected within the draft Local Plan's strategic policies.
3. Overarching Spatial Policies, Policy OSP2	OPDC should consider taking an alternative approach to land use zonings that is less fixed or more blurred approach and does not have line boundaries on a plan. This would allow for residential uses in industrial areas and employment uses in residential areas	11	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, Wells House Road Resident's Association, 6 residents	

3. Overarching Spatial Policies, Policy OSP5	Support requirement for developers to submit a meanwhile strategy	8	Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, Diocese of London, Old Oak Park (DP9), TITRA, London Sustainable Development Commission, 2 residents	Noted. This is now covered in Policy SP6 and more detailed policy guidance is provided in Policy TCC9.
8. Employment, Policy E4	Support Policy E4	1	Midland Terrace Resident's Group, TITRA	Noted.
3. Overarching Spatial Policies, Policy OSP5	Oppose Local Plan supporting a sports stadium in the area due to their significant infrastructure requirements and impacts on amenity on match days.	5	Midland Terrace Resident's Group, Old Oak Interim Forum, Old Oak Park (DP9), , Grand Union Alliance, 1 Resident	Noted. The Local Plan does not specify which catalyst uses are or are not appropriate; however, Policy TCC8 provides a criteria based policy to assess the acceptability of different catalyst uses. This approach will ensure that for any future catalyst use to be appropriate it will be assessed against a range of policy requirements. This policy will be supported by evidence from a Catalyst Uses Study.

3. Overarching Spatial Policies, Policy OSP4	Concerns raised that the densities proposed in the OPDC area are too dense and exceed the London Plan density matrix range and could compromise liveability	9	Midland Terrace Resident's Group, the Hammersmith Society, Old Oak Interim Forum, Midland Terrace Resident's Association, TITRA, Hammersmith and Fulham Historic Buildings Group, 3 residents	No change proposed. As set out In SP2 and SP9, OPDC is committed to developing an exemplarily designed built environment. OPDC's Local Plan is supported by a Precedents Study. To ensure the Local Plan meets the London Plan housing and employment targets for the area, development will generally be a mix of medium and high densities and height, but new development will need to respond appropriately to sensitive locations, as set out in Policy SP9. In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG, OPDC's Development Capacity Study and in the Old Oak and Park Royal OAPF.
3. Overarching Spatial Policies, Policy OSP5, QOSP5b	Grand Union Canal Place boundary should be widened to include more land either side of it as the properties and land uses adjacent to the canal are just as much part of the 'place' as the canal and towpath	1	National Bargee Travellers Association	No change proposed. The need to respond to the setting of the canal is picked up in the respective place policies that border the canal.

3. Overarching Spatial Policies, Policy OSP5	Support proposals for a sports stadium in the OPDC area and this should be identified in the Plan	8	QPR, 7 residents, 2 businesses	Noted. The Local Plan does not specify which catalyst uses are or are not appropriate; however, Policy TCC8 provides a criteria based policy to assess the acceptability of different catalyst uses. This approach will ensure that for any future catalyst use to be appropriate it will be assessed against a range of policy requirements. This policy is supported by evidence from a Catalyst Uses Study.
3. Overarching Spatial Policies, Policy OSP1	The OPDC Local Plan would benefit from acknowledgment under Policy OSP1 that all forecasts of demand for growth in jobs and homes in London are to an extent speculative, and subject to what happens in the global and national economy over the 20 year Plan period.	3	Old Oak Interim Forum, the Hammersmith Society, Midland Terrace Resident's Group	No change proposed. The NPPF requires Local Plans to set out clear policies for how housing needs will be met through the supply of housing. OPDC does this through its Strategic Housing Market Assessment, Housing Strategy and Development Capacity Study. The Plan has been produced to the best of OPDC's knowledge on current and future market conditions. Were OPDC to start to not meet its targets or exceed them, due potentially to external factors, this would be flagged through OPDC's Authority Monitoring Report (AMR) and would potentially trigger a need to review the policies of the Local Plan accordingly.
3. Overarching Spatial Policies, Policy OSP5	Support Policy OSP5	7	Old Oak Interim Forum, TITRA, Old Oak Park (DP9), 4 residents	Noted.
3. Overarching Spatial Policies, Policy OSP5	Should avoid the use of the term 'celebrate' within the policy unless it is defined.	1	Old Oak Interim Forum	Change proposed. The word celebrate has been removed from the strategic policies.

3. Overarching Spatial Policies, Policy OSP5	Support potential for catalyst uses in the area	11	Old Oak Interim Forum, Old Oak Park (DP9), The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group, 6 residents, 1 business	Noted. The Local Plan does not specify which catalyst uses are or are not appropriate; however, Policy TCC8 provides a criteria based policy to assess the acceptability of different catalyst uses. This approach will ensure that for any future catalyst use to be appropriate it will be assessed against a range of policy requirements. This policy will be supported by evidence from a Catalyst Uses Study.
3. Overarching Spatial Policies	Support the overarching spatial policies	1	Old Oak Park (DP9)	Noted.
3. Overarching Spatial Policies	Should add a new overarching spatial policy entitled 'infrastructure' that identifies the scale of these requirements	1	Old Oak Park (DP9)	Change proposed. A new strategic policy has been added entitled 'integrated delivery', covering infrastructure, to address this representation.
3. Overarching Spatial Policies, Policy OSP2, figure 13	Figure 13 should be marked as 'illustrative'	1	Old Oak Park (DP9)	Change proposed. All illustrative images have been marked as illustrative in the Local Plan.

				Noted. The Local Plan does not specify which catalyst uses are or are not appropriate; however, Policy TCC8 provides a criteria based policy to assess the acceptability of different catalyst uses. This approach will ensure that for any future catalyst use to be appropriate it will be assessed against a range of policy requirements. This policy will be supported by evidence from a Catalyst Uses Study. The part of the holistic offer criteria require that a proposal has a positive outcome in respect of: • Supporting the delivery of the spatial vision and strategic policies; • Complementing other existing or proposed planned catalysts and surrounding uses; • not inhibiting development on surrounding sites; • Supporting place-making and identity. • Impacting the delivery of OPDC's housing target. • Impacting land values of adjacent uses • Contributing to the quantum, quality and design of public realm and open space. • Optimising number of hours/days the catalyst is utilised per annum. • optimising the proportion of active or positive frontage.
3. Overarching Spatial Policies, Policy OSP5. QOSP5f	A stadium will require an enormous amount of land which would hugely reduce its ability to deliver new homes, jobs and other uses	2	Old Oak Park (DP9), 1 resident	

3. Overarching Spatial Policies, Policy OSP4	It is too early to predetermine and fix appropriate densities	1	Old Oak Park (DP9)	Change proposed. The Local Plan no longer sets density bands for density as this was felt too blunt a tool to factor the need to respond differently in different areas to context and to public transport access. Policy SP9 instead requires development to be optimised, delivering higher densities and taller buildings in areas of high public transport access and at identified 'clusters' and responding appropriately to the setting of sensitive locations, including designated and undesignated heritage assets, open spaces and existing residential communities. The place policies define appropriate storey heights for buildings, where more detailed and specific policy guidance for this is deemed appropriate.
3. Overarching Spatial Policies, Policy OSP5	Policy should be clearer on how catalyst uses can support growth and place-making	1	QPR	Change proposed. The revised Local Plan includes further detail in policies SP6 and TCC8 on how catalyst uses can support growth and place-making
3. Overarching Spatial Policies, Policy OSP5	The policy should include a statement recognising that catalyst uses can enable early delivery of the kind of high density residential development required by the housing targets identified.	1	QPR	No change proposed. Not all 'catalyst uses' guarantee the early delivery of homes and jobs. For this reason, the Local Plan now includes a criteria based policy and proposals will need to demonstrate that they perform positively against these criteria. One of these criteria relates to the delivery of homes and jobs in a timely fashion.
3. Overarching Spatial Policies, Policy OSP2	Figures 12 and 13 should be amended to show potential for residential development on 74 Goodhall Street and 73 Stephenson Street	1	Raban Management Ltd and Raban Goodhall Ltd	Change proposed. The SIL boundaries will be amended to show the potential for mixed use development on these properties.

3. Overarching Spatial Policies, Policy OSP1	The optimised growth outlined in Policy OSP1 should not be at the expense of development and growth in existing centres	1	Royal Borough of Kensington and Chelsea	Change proposed. Policy SP6 notes the importance of town centres in the OPDC area complementing surrounding town centres
3. Overarching Spatial Policies, Policy OSP5, QOSP5c	Should identify a new place that draws together the existing housing to the west of Old Oak and the eastern part of Park Royal covering Old Oak Lane and Victoria Road	8	The Hammersmith Society, TITRA, Wells House Road Resident's Association, Midland Terrace Resident's Group, Old Oak Interim Forum, 3 residents	Change proposed. OPDC have identified a new place, known as Old Oak Lane and Old Oak Common Lane, which draws together these communities.
3. Overarching Spatial Policies, Policy OSP5, QOSP5d	Old Oak West (P9) should also be identified as an appropriate location for catalyst uses	1	The Inland Waterways Association	The new Local Plan no longer specifies appropriate places for catalyst uses, but instead has a policy TCC8 with criteria against which applications for catalyst uses would be assessed. Most catalyst uses would fall within the definition of town centre uses and as such, would need to adopt a town centre first principle, in accordance with Policy TCC1.
3. Overarching Spatial Policies, Policy OSP5, QOSP5f	Would strongly oppose catalyst uses if it resulted in increased densities	2	The Inland Waterways Association, 1 resident	Noted. The appropriateness of densities is controlled through Policy SP9 and through the policies in the design chapter.
3. Overarching Spatial Policies, Policy OSP5, QOSP5h	All development sites adjoining the canal in Old Oak would benefit from site specific policies to provide guidance on density/scale, public space, privacy and security, access and movement.	1	The Inland Waterways Association	No change proposed. The Local Plan has a place covering all the Grand Union Canal and this sets out how development adjacent to the canal should respond appropriately to its setting.

3. Overarching Spatial Policies, Policy OSP2, Figure 13	Catalyst uses should be identified in Figure 13	1	Resident	No change proposed. Catalyst uses are now defined in Policy TCC8.
3. Overarching Spatial Policies, Policy OSP2	Space should be allocated for cultural, leisure and sporting activities with developers making a major contribution to schools, GP surgeries, hospitals and A and E (currently being downgraded), theatres, art galleries, museums, cinemas, swimming pools, gyms, food shopping such as Aldi and Lidl	2	2 Residents	No change proposed. This is covered in a variety of policies in the Local Plan, including SP4, SP6, TCC2, TCC4, TCC5, TCC6 and TCC8.
3. Overarching Spatial Policies, Policy OSP5	OPDC should be seeking to promote a wide variety of catalyst uses and locals should be consulted on the appropriateness of catalyst uses	4	4 Residents	Noted. The Local Plan supports the provision of a range of catalyst uses in Policy SP5. Local residents would be consulted on the appropriateness of any catalysts as part of planning applications and, in accordance with OPDC's Statement of Community Involvement (SCI), developers would also be encourages to undertake early pre-application engagement with communities.
3. Overarching Spatial Policies, Policy OSP2	Willesden Junction bus garage should be dedesignated from SIL and identified for town centre uses to help integrate Harlesden Town Centre and Old Oak High Street. This should also be considered as a site for a catalyst use and strategic site	3	2 Residents, Harlesden Neighbourhood Forum	No change proposed. OPDC's Industrial Land Review justifies the release of SIL in Old Oak. The Willesden Junction bus garage is considered to be separate to the area of comprehensive development envisioned for Old Oak. The bus garage is in operation by TfL and is a SIL compliant use. TfL are not proposing to relocate the bus garage. Section 16 of the Mayor's Land for Industry and Transport SPG notes the importance of protecting land for bus garages and industrial

				land provides suitable space for bus garages and that such land should be protected.
3. Overarching Spatial Policies, Policy OSP4	All existing residential communities should be identified as having sensitive edges	1	Resident	Change proposed. All existing communities are identified as sensitive locations in Policy SP9.
3. Overarching Spatial Policies, Policy OSP5	Would not support an exhibition centre as it would not contribute anything to the area	1	Resident	Noted. The Local Plan is not explicitly supporting an exhibition centre. An exhibition centre would constitute a town centre use and would therefore be assessed against the Local Plan's town centre uses policies, as well as other relevant planning policies in the Local Plan.

3. Overarching Spatial Policies, Policy OSP2	There are too many jobs proposed and not enough homes	3	3 Residents	No change proposed. The area is considered a strategic location for the provision of new jobs. The Local Plan will continue to protect Park Royal as Strategic Industrial Location (SIL) and encourage its intensification, where appropriate. In Old Oak, the Local Plan promotes the creation of a new commercial hub around the planned Old Oak Common station. The future public transport access in this location makes it appropriate for the provision of a significant number of new jobs. Created a mixture of uses in Old Oak and Park Royal will support the longer term sustainability of the area, minimising people's need to travel long distances.

3. Overarching Spatial Policies, Policy OSP2	OPDC should release more SIL to develop more mixed use development including residential and enable lower densities to be delivered in Old Oak	4	2 Residents, Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Officers consider that taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. Officers support the potential for a mix of land uses in Old Oak and this is already reflected within the draft Local Plan's strategic policies.
3. Overarching Spatial Policies, Policy OSP5	Meanwhile uses should only be supported where they are viable and do not impact on the monies available for delivering permanent facilities, particularly in the case of community uses	2	2 Residents	Change proposed. The Local Plan now includes a policy on meanwhile uses. The policy recognises the importance of meanwhile uses not impacting on the delivery of permanent structures and that measures should be put in place to support meanwhile uses occupying permanent spaces in the development.

3. Overarching Spatial Policies, Policy OSP3	OPDC should have a policy to promote pocket parks	1	Resident	Change proposed. Policies SP8 and EU1 promote the provision of a range of spaces to meet needs, including pocket parks.
8. Employment, Policy E1	Support approach to safeguarding SIL in Park Royal	3	Residents, London Sustainable Development Commission	Noted.
3. Overarching Spatial Policies, Policy OSP5, QOSP5c	Should split Park Royal into two places - one to the east where the focus is for smaller businesses and one to the west where the focus is for larger businesses.	1	Resident	Change proposed. Park Royal has now been split into two places: Park Royal West, which covers the newer and larger industrial spaces and Old Park Royal, which covers the part of the estate built predominantly prior to WWII and which has a finer grain and higher intensity of SME workspaces.
3. Overarching Spatial Policies, Policy OSP5, QOSP5c	Harlesden Town Centre should be identified as a separate place with its own policy	3	3 Residents	No change proposed. Harlesden Town Centre is not within the OPDC boundary.
3. Overarching Spatial Policies, Policy OSP5	Should identify exact locations for catalyst uses rather than general areas	1	1 resident	No change proposed. OPDC wants to ensure the Local Plan maintains a degree of flexibility. The Local Plan does now include a more detailed policy for the assessment of catalyst uses.
3. Overarching Spatial Policies, Policy OSP3	OPDC should look to provide as many open spaces as it feasibly possible	1	Resident	Noted. OPDC's Local Plan is informed by more detailed evidence work, which is seeking to optimise open space provision. As part of this, OPDC are seeking to secure the delivery of 3 new local parks (2ha +), along with supporting smaller parks, pocket parks and street and urban greening to support the delivery of an integrated and high quality green infrastructure network.

8. Employment, Policy E1	The Local Plan should be more specific about the types of employment it will look to attract to the area	2	London Sustainable Development Commission, 1 resident	Change proposed. The Local Plan is supported by the future employment growth sectors study. The sectors identified through this study are highlighted next to policy E2.
8. Employment, Policy E5	Need to focus on long-term and medium to high skills employment opportunities	2	2 Residents	Noted. OPDC's policies aim to ensure a range of job opportunities over a range of skills levels and employment sectors.
3. Overarching Spatial Policies, Policy OSP1	The optimising growth policy should address the potential growth in the low – zero carbon economy and development, the circular economy, the 'internet of things', and the likely businesses and skills emanating from these.	1	London Sustainable Development Commission	Change proposed. Policy SP2 identifies the potential for the internet of things and the circular economy. The zero carbon economy is covered within the future growth sectors work in support of Policy E2.
3. Overarching Spatial Policies, Policy OSP3	The Plan should look to try and reduce the severance more between Old Oak and Park Royal	1	London Sustainable Development Commission	Change proposed. The Local Plan is now clearer about how this severance can be overcome through enhanced east-west connections. The place policies for Channel Gate, Old Oak Lane and Old Oak Common Lane, North Acton and Acton Wells, Park Royal West and Old Park Royal include a variety of measures aimed at securing transport measures to help to better integrate Old Oak with Park Royal.
8. Employment, Policy E1	The Plan should make reference to the potential for a cleantech cluster within OPDC	1	London Sustainable Development Commission	Change proposed. Cleantech has been identified as a potential growth sector within Policy E2 and its supporting text. The Channel Gate place is identified as a potential industrial innovation area, which could include the potential for the creation of a cleantech cluster here.

3. Overarching Spatial Policies, Policy OSP3	OSP3 should make specific mention of the canal and Wormwood Scrubs as key open spaces and leisure areas	1	Hammersmith and Fulham Historic Buildings Group	Change proposed. Policy SP9 references the particular importance of the Grand Union Canal and Wormwood Scrubs to the OPDC area's green infrastructure and open space network.
3. Overarching Spatial Policies, Policy OSP5, QOSP5b	Scrubs Lane boundary should be expanded to adhere to that shown in Figure 49.	1	Hammersmith and Fulham Historic Buildings Group	Change proposed. Scrubs Lane has been expanded.
3. Overarching Spatial Policies, Policy OSP5, QOSP5g	The catalyst uses policy should have criteria dealing with quality of design and importance in terms of visitor numbers	1	Hammersmith and Fulham Historic Buildings Group	Change proposed. The criteria address importance of visitor numbers and footfall. Requirements for design quality are dealt with in the design chapter and cover the public realm and all buildings.
3. Overarching Spatial Policies, Policy OSP5, QOSP5g	Catalyst uses should also be tested against some measure of economic value	1	Hammersmith and Fulham Historic Buildings Group	Change proposed. There are criteria that deal with the economic value of the facility in terms of direct and indirect jobs, full time equivalent jobs and the gross value added of the facility.
3. Overarching Spatial Policies, Policy OSP2,Development Capacity Study	The Development Capacity Study does not question or provide any justification for these targets, or explain why and when they became minimum targets.	1	Old Oak Interim forum	No change proposed. The Development Capacity Study has derived the capacity from consideration of a number of factors, including the areas that are sensitive locations, the public transport access and recognition of the OPDC area's identification as Opportunity Areas in the London Plan.
3. Overarching Spatial Policies	Need to consider impacts of development on Harlesden	1	Resident	Noted. OPDC is working closely with Brent Council to ensure impacts are appropriately mitigated. A number of the Local Plan's policies are aimed at minimising impacts. Such policies include the identification of Harlesden as a sensitive location (SP9), requirements for a Harlesden Enhancement Strategy (places policies) and car parking

				controls to minimise impacts on the transport network.
3. Overarching Spatial Polices, Policy OSP3	Additional strategic policies should encourage development that supports walkable networks within the OPDC area	1	Grand Union Alliance	Change proposed. Policy SP7 promotes healthy streets and OPDC's sustainable transport hierarchy, which prioritises pedestrians and cyclists.
3. Overarching Spatial Policies, Policy OSP4	Policy OSP4 is incompatible with other policies in the Plan such as TC7.	1	Old Oak Interim Forum	No change proposed. OSP4 now no longer exists as a policy. Officers do not consider it conflicts with the night time economy policy as this policy does allow for extended hours of operation where impacts on residential amenity are appropriately mitigated.
8. Employment, Policy E4	Should provide low cost studio and business space	1	1 Resident	Change proposed. Policies E2 and E3 seek to secure provision of low-cost workspace.
3. Overarching Spatial Policies, Policy OSP5	Should look to support something that is unique and different, such as a concert venue or lido	1	1 Resident	No change proposed. The Local Plan supports the potential for 'catalyst' uses, subject to them according with Local Plan policy and specifically, Policy TCC8. Policy TCC5 supports the provision of culture and art facilities.
3. Overarching Spatial Policies, Policy OSP5	Support meanwhile uses	1	1 Resident	Change proposed. Policy SP6 supports the provision of meanwhile uses. Policy TCC9 sets out criteria which look to secure a range of high quality meanwhile uses.

3. Overarching Spatial Policies, Policy OSP5, QOSP5c	Old Oak Common Station should be a separate place with its own policy guidance	1	Midland Terrace Resident's Group	No change proposed. Officers do not consider there merit in having a separate place for the Old Oak Common station as a key policy principle for its delivery is that it is properly embedded and integrated into the Old Oak South place. However, the Local Plan does identify it as a 'cluster', with more detailed and specific policy guidance here for the station.
3. Overarching Spatial Policies, Policy OSP5, QOSP3	The area covered by the IEP depot should be given a new place name	1	Resident	No change proposed. Officers consider there is not enough specific policy guidance for the IEP depot to warrant its own place, especially as the IEP depot is not identified for redevelopment in the Plan period.
3. Overarching Spatial Policies, Policy OSP3	Smaller, finer grain neighbourhoods should be encouraged and allowed to develop own character linked to the retention of heritage buildings.	1	Resident	No change proposed. The Plan promotes the need for development to respond to surrounding context and townscape (Policy SP9) and for development to create a series of distinct but connected places (Policy SP6).
3. Overarching Spatial Policies, Policy OSP3	Should look at delivering more connections between Old Oak North and Old Oak South	1	QPR (NQP Development Services)	No change proposed. OPDC's Local Plan is looking to take a balanced approach between delivering appropriate connections and considering the viability of costly infrastructure. Additional connections between Old Oak North and Old Oak South would require bridging over the Grand Union Canal, which is expensive. Officers consider that the approach taken to infrastructure delivery currently strikes the right balance between creating high quality and connected places and maintaining deliverability and viability.
OSP3	Typo – new and improved connections.	1	LB Brent	Change proposed. The typo has been corrected.

OSP3	Wording of OSP3 should be strengthened to require delivery of open space	1	LB Brent	Change proposed. Delivery of open space is now covered in Policy SP8 and in Policy EU1.
OSP3	Identify Park Royal Station to Harrow Road via Willesden Junction as a key route. Route from Willesden Junction Station to Harrow road to be improved	1	LB Brent	Change proposed. The connection from Willesden Junction to Harrow Road is now included as part of Old Oak High Street
OSP3	Request further detail on what is proposed for Lakeside Drive and Rainsford Road	1	Diageo	Change proposed. Further details are now included in the cluster policy for the Brewery Quarter within Park Royal West.
OSP3	Support decking across railways and canals	2	Farrells, London Sustainable Development Commission	Noted. The potential for decking over rail tracks is referenced where relevant in the place policies and in the delivery and implementation chapter. The Local Plan proposes new bridge links over the Grand Union Canal.
OSP3	Oppose access to Wormwood Scrubs from Old Oak Common Station at current location. Suggest alternative is to the east of the station. There isn't a rationale for a north-south route across the Scrubs given existing connections. Remove reference to Green Cross.	3	Friends of Wormwood Scrubs, Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. The Local Plan continues to identify the importance of providing access to Wormwood Scrubs from development to the north. However, in addition to the access proposed from the station, a new access is also proposed to the east of this, which could potentially be delivered sooner and in advance of the relocation or reconfiguration of the IEP depot.

OSP3	Scrubs shouldn't be used as amenity space for new development	2	Friends of Wormwood Scrubs, Local resident	No change proposed. The Local Plan proposes that development washes its own face in terms of open space provision. However, Wormwood Scrubs can fulfil a role of a district and metropolitan park for the development. The Wormwood Scrubs Act talks about the space being for the inhabitants of the metropolis and providing access to the space and allowing residents in Old Oak to make use of it is fully in accordance with the Act.
OSP3	Local Plan should show areas of deficiency in open space and biodiversity	1	GiGL	Noted. The previous draft Local Plan did identify areas of deficiency and the new draft Local Plan proposes to designate new local parks which overcome these deficiencies.
OSP3	Consultation with disabled people or a local access group to create a Strategic Access Panel should be carried out	1	GLA	No change proposed. OPDC makes use of the GLA's Strategic Access Panel and has presented to the group twice during the production of the Local Plan.
OSP3	Add text on achieving the highest level of accessibility in line with London Plan policy 7.2? Point 2 add text about 'well designed inclusive streets'.	1	GLA	Noted. The Local Plan makes reference to the importance of creating an accessible and inclusive public realm and buildings throughout the strategic policies and in Policy D3 in the design chapter.
OSP3	include a commitment to inclusive streetscape both for existing and new.	1	GLA	Noted. This is covered through Policy SP9 and other strategic policies.
OSP3	Accessibility is an issue across London	1	Local resident	Noted. The Local Plan recognises the importance of creating an accessible and inclusive community in the strategic policies.

OSP3	Connections to Harlesden Town Centre key	1	Harlesden Neighbourhood Forum	Change proposed. The Local Plan is now a lot clearer about the importance of connecting into Harlesden and details regarding this are included in the Willesden Junction, Old Oak North, Old Oak Lane and Old Oak Common Lane and Scrubs Lane places.
OSP3	Grand Union St will be particularly important in terms of tying the area together	1	LB Ealing	Noted.
OSP3	Existing open spaces should be protected with new spaces created	2	Midland Terrace Resident's Group, local resident	Change proposed. The requirements for protection of existing spaces and creation of new spaces are covered in policies SP8, EU1 and in the relevant place policies in chapter 4.
OSP3	Have specific policy on GI in overarching spatial policies	1	Natural England	Change proposed. This is now covered in Policy SP8.
OSP3	Define 'celebrate' in a policy delivery context	1	Old Oak Interim Forum	Change proposed. Celebrate has been removed from policy.
OSP3	General support	1	Old Oak Park	Noted.
OSP3	Define figure 16 as illustrative	1	Old Oak Park	Noted. Illustrative figures have been defined as illustrative, where appropriate.
OSP3	Specifically reference route between Willesden Junction Station and Old Oak Common Station	1	NQP Development Services	No change proposed. This is called Old Oak High Street
OSP3	Specifically state the aspiration to improve PTAL ratings	1	NQP Development Services	Change proposed. This is covered in the first paragraph of the supporting text to Policy SP7.
OSP3	Refer to connections to Kensal Canalside OA	1	RBKC	No change proposed. This is covered in Policy SP1 and in the Scrubs Lane place.
OSP3	Support approach to high density and building heights	1	RBKC	Noted

OSP3	Provide more detail on new open spaces	1	TITRA	Change proposed. Further details on new open spaces are provided in Policy EU1 and in the relevant place policies.
OSP3	Improve routes between existing residential areas and through Atlas Road Junction	3	Local resident, LB Brent	Change proposed. Improvements to Atlas Junction are identified in its cluster policy in the Old Oak Lane and Old Oak Common Lane place. Other route improvements have been identified, where appropriate and relevant in the place policies
OSP3	Provide more detail for how existing communities and neighbourhoods will be connected with new development	4	Local residents	Change proposed. Details about connections are embedded throughout the relevant place policies.
OSP3	Deliver more tall buildings to provide room for open space	1	Local resident	No change proposed. OPDC's approach to tall buildings is set out in Policy SP9 and D5.
OSP3	Deliver more green space in North Acton	1	Local resident	Change proposed. Policies SP9 and EU1 requires development to support the delivery of 30% public open space on development sites in the OPDC area. The place policies for North Acton (P7) also identify specific sites for open space provision.
OSP3	Concerns regarding amount of open space proposed in Old Oak North	2	Local residents	Change proposed. Policy EU1 requires development to support the delivery of 30% public open space on development sites in the OPDC area. Policy P2 requires the delivery of a new local park (2ha+) in Old Oak North and a linear local park (2ha+) along the Grand Union Canal)
OSP3	Thought needed to connect people with Park Royal	2	Local residents	Change proposed. The place policies P5, P7, P8 and P9 include further details on how development proposals should support better connections between Old Oak, Park Royal and the surrounding hinterland.

OSP3	Canal to be shown as open space	1	Local resident	Change proposed. The Local Plan Grand Union Canal Place (P3) identifies the requirement to provide a linear local park (2ha+) along the Grand Union Canal.
OSP3	Open spaces should be naturalistic and self sufficient	2	Local resident, LB Brent	No change proposed. The Local Plan identifies in Policy SP9 and EU1 that open space needs to provide for a variety of functions. This includes biodiversity and further details on OPDC's requirements for biodiversity are set out in Policy EU2.
OSP3	Urban agriculture and bee keeping should be included	2	Local resident, LB Brent	Change proposed. Policy EU1 promotes urban food growing. Urban agriculture is a theme supported in OPDC's Circular Economy Strategy. OPDC's Circular Economy policy in the environment chapter requires developers to submit their own circular economy strategy demonstrating how their proposals support circularity in certain themes including food.
OSP3	Open spaces should be accessible from Harlesden	1	Local resident	Noted. The Local Plan includes proposals to deliver better connections to Harlesden, meaning public open space in the OPDC area would be accessible from Harlesden.
OSP3	Trees planted should be semi mature	1	Local resident	Change proposed. The requirement for tree planting to be semi-mature or mature is included in Policy EU2.
OSP3	Policy should be revised to show how an area-wide approach to creating, restoring and linking spaces and types of spaces which will be created.	1	Local resident, London Sustainable Development Commission	Change proposed. Policies SP9 and EU1 now clearly sets out the requirement to deliver 30% of the developable area as public open space and the hierarchical approach that should be taken to support this.

OSP3	New open spaces in short term needed to mitigate impact of HS2	1	Local resident	No change proposed. HS2's proposed mitigation measures are dealt with through the HS2 Act and its associated SA/SEA. OPDC as planning authority is only able, through the Local Plan to consider certain parameters of proposals, known as Schedule 17 matters.
OSP3	The ASDA was suggested for a green area and public realm	1	Local resident	Change proposed. The ASDA cluster in the Park Royal Centre place policy (P6) identifies the need for development on the ASDA site to deliver public open space. This is also a requirement in Policies SP8 and EU1, which requires proposals to deliver 30% public open space or provide appropriate financial contributions in lieu of provision.
OSP3	Connect communities to open spaces	1	Local resident	Change proposed. The delivery of a high quality connected green grid is now clearly outlined in Policy SP8 (green infrastructure and open space) and EU1 (open space)
OSP3	Cemetery should not be considered as public open space	1	Local resident	Noted. Cemeteries are defined as publicly accessible, but are considered to have a limited function.
OSP3	Open spaces should be shown clearly	1	Local resident	No change proposed. Spaces are shown clearly where OPDC are able to be more certain about the appropriate location of public open space, but for other spaces, there is a need for flexibility regarding the exact locations of public open space provision.
OSP3	North South movement isn't clearly shown	1	London Sustainable Development Commission	No change proposed. Throughout the Local Plan the document refers to the need for a series of connections across the area to improve permeability and legibility.

OSP3	Improve access to White City and Hammersmith	1	London Sustainable Development Commission	No change proposed. The principle of enhanced connections to White City and Hammersmith are covered through a number of policies in the Local Plan, including SP7 (connecting people and places), P2 (Old Oak North) and the associated delivery of the new Hythe Road Overground station, and P10 (Scrubs Lane).
OSP3	Navigation through area should be pleasant and easily legible. More recent developments are monotonous. Support the celebration of existing open space.	1	Hammersmith and Fulham Historic Buildings Group	No change proposed. Legibility is covered in Policy SP7 (connecting people and places), throughout the places chapter (chapter 4), in the design chapter (chapter 5) and through relevant policies in the transport chapter (chapter 7).
OSP4	Sensitive edges are suitable locations for higher densities and tall buildings. OSP4 should be applied flexibly in these locations	2	Aurora Developments Ltd, Boropex Holdings Limited	No change proposed. OPDC's Local Plan continues to identify sensitive locations and the need for development to respond appropriately to these. The Local Plan does however through the places chapter, provide more details on appropriate locations for higher densities and potentially tall buildings.
OSP4	Amend OSP iv to include "unless site-specific circumstances allow otherwise"	1	Boropex Holdings Limited	No change proposed. Policy OSP4 has been significantly altered in the revised Local Plan and this suggested wording is no longer relevant.

OSP4	Policy D4: New Buildings, states that new proposals 'will be required to' deliver the densities identified within Policy OSP4. This wording strongly suggests that the densities within Policy OSP4 are absolutes, which is not the positon set out in 3.27 as discussed above. Accordingly, we suggest that the wording of Policy D4 is amended to set out that development 'should normally reflect' the development densities set out in OSP4	1	Boropex Holdings Limited	No change proposed. Policy OSP4 has been significantly altered in the revised Local Plan and this suggested wording is no longer relevant.
OSP4	Policy should focus on creating a sustainable community with human scale development of mansion blocks and taller buildings at transport interchanges	1	LB Brent	No change proposed. It is not felt appropriate to specify the exact form of development as being mansion blocks. The Local Plan does identify the potential for taller buildings to be appropriate in areas of high public transport accessibility and at identified clusters.
OSP4	Define 'key destinations' and 'contributing to placemaking'	1	LB Brent	Change proposed. 'Key destinations' are no longer referred to in the Local Plan. Policy SP9 requires development to contribute positively to a locally distinctive townscape and further details on how this should be achieved are contained in the design chapter policies.

OSP4	Options for providing development on top of the WCML should be explored and shown on figure 18	1	LB Brent	Change proposed. The Local Plan identifies the potential for development on top of the LOROL depot. The Local Plan does not reference the feasibility of otherwise of decking over and developing on the West Coast Main Line. There was explored as part of the Willesden Junction Station feasibility study, which shows that this is likely to be very challenging as the West Coast Main Line carries electrification cables along this stretch. If decking and development did prove to be feasible, an application for this would be considered on this own merits. OPDC's Local Plan does recognise the need for an optimised approach to development and the need for development to support the delivery of a minimum homes and jobs figures.
OSP4	Apply policy flexibly	2	City and Docklands Property Group, Diageo Plc, Old Oak Park	No change proposed. There is a need for development to demonstrate accordance with the Local Plan's policies. Most of OSP4 is now included in Policy SP9.
OSP4	Update phasing map in North Acton and Park Royal	2	City and Docklands Property Group, Diageo Plc	Change proposed. The phasing map associated with policy SP10 and H1 has been updated to include comments from developers and landowners regarding the appropriate phasing of their respective sites.
OSP4	Tall buildings may only create vibrancy and a sense of place if they are occupied and have active ground floor uses. Agree with the areas identified as sensitive edges/locations.	1	Diocese of London	Change proposed. OPDC's tall buildings policy (D6) includes a number of criteria aimed at ensuring the building has a high quality, active public realm at ground level.

OSP4	Policy lacks clarity	1	Friends of Wormwood Scrubs	Change proposed. Policy OSP4 has been removed and most of its scope is now covered in Policy SP9. Further details on appropriate densities and tall buildings are included in the places chapter (chapter 4).
OSP4	Contradiction between sensitive edge along Scrubs and tall building location at Old Oak Common Station	4	Friends of Wormwood Scrubs, MP for Hammersmith, local resident, Hammersmith and Fulham Historic Buildings Group	No change proposed. The Local Plan identifies that the area around Old Oak Common station is an appropriate location for tall buildings given its high public transport access. The plan also identifies that Wormwood Scrubs is a sensitive location and that any development needs to appropriately respond to its setting and designation as MOL.
OSP4	Clarity on building heights needed	6	Friends of Wormwood Scrubs, GUA, Old Oak Interim Forum, TITRA, Local residents	Change proposed. Policy SP9 provides high level policy guidance on OPDC's approach to densities and building heights. Where appropriate, this is elaborated on in the places chapter, which provides more specific density and height guidance where more specificity is deemed appropriate.
OSP4	Building heights adjacent to Scrubs should be identified to be lowest	1	Friends of Wormwood Scrubs	Change proposed. Policy SP9 identifies Wormwood Scrubs as a sensitive location which should be responded to appropriately. Policy P1 identifies that development should respond specifically to its designation as MOL.

OSP4	Building heights at Old Oak Common Station should be lower with tallest elements at Hythe Road Station to manage impact on Wormwood Scrubs	2	Friends of Wormwood Scrubs, Hammersmith and Fulham Historic Buildings Group	No change proposed. The Local Plan identifies the Old Oak Common station as an appropriate location for tall buildings. It does not specify the exact height of these in relation to any tall buildings near to Hythe Road station. Any proposal for a tall building in Old Oak South would need to be considered against a range of Local Plan policies and specifically, Policy SP9, P1 and the design chapter policies (chapter 5).
OSP4	Agree with locations of sensitive edges subject to other comments	1	Friends of Wormwood Scrubs	No change proposed. These are now referred to as sensitive locations.
OSP4	Densities and buildings heights are closely linked	1	GUA	Noted.
OSP4	Average density exceeds London Plan density guidance which may compromise space standards	1	GUA, Old Oak Interim Forum	No change proposed. OPDC's local Plan must be in general conformity with the London Plan. To achieve the minimum 25,500 homes target identified for the area in the London Plan, in parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG. The London Plan internal space would still need to be accorded with, as referenced in the housing chapter.
OSP4	Tall and high density buildings will not create lifetime neighbourhoods that meet local and wider needs.	1	GUA	No change proposed. High density development and tall buildings does not run contrary to the principles of lifetime neighbourhoods if designed well. The policies throughout the Local Plan set out how buildings and spaces should be well-designed to support the delivery of lifetime neighbourhoods at high densities.

OSP4	Queries whether housing targets are justified and whether capacity studies have sufficiently considered local character	1	GUA, Midland Terrace Resident's Group	No change proposed. OPDC must be in general conformity with the London Plan, which identifies the OPDC area as delivering a minimum 25,500 homes and 65,000 jobs. OPDC has undertaken a Development Capacity Study, in accordance with NPPF and NPPG guidance. This study does recognise that parts of the OPDC area are appropriate for high density development, whilst other parts of the area are more sensitive to high density development and that in these locations, development would need to appropriately respond to the sensitive locations, in accordance with Policy SP9. Further details on how development should appropriately respond to sensitive locations is provided in the place chapter policies. The Development Capacity has assessed the capacity of sites taking into consideration sensitive locations. In Scrubs Lane and Victoria Road and Old Oak Lane, this has been informed by very detailed density modelling as part of their associated Development Frameworks

OSP4	The Development Capacity Study applies the predetermined London Plan Old Oak and Park Royal Opportunity Area targets and should test building heights to inform capacity	1	GUA	No change proposed. OPDC must be in general conformity with the London Plan, which identifies the OPDC area as delivering a minimum 25,500 homes and 65,000 jobs. OPDC has undertaken a Development Capacity Study, in accordance with NPPF and NPPG guidance. This study does recognise that parts of the OPDC area are appropriate for high density development, whilst other parts of the area are more sensitive to high density development and that in these locations, development would need to appropriately respond to the sensitive locations, in accordance with Policy SP9. Further details on how development should appropriately respond to sensitive locations is provided in the place chapter policies. The Development Capacity Study has assessed the capacity of sites taking into consideration sensitive locations. In Scrubs Lane and Victoria Road and Old Oak Lane, this has been informed by very detailed density modelling as part of their associated Development Frameworks.
OSP4	It is not clear which areas of land will be used to deliver housing.	1	GUA	Change proposed. The land use diagram in the strategic policies chapter identifies the sites capable of delivering housing. Housing sites are also identified in the figure associated with Policy H1 in the housing chapter.
OSP4	Densities may negatively impact on Spatial Vision and Objectives	1	GUA	No change proposed. The Local Plan contains policies which outline how development should deliver high densities, yet still support OPDC's aspirations for

				sustainability, health and well-being and design quality.
OSP4	A detailed evidence base study is required to look at housing land availability, building heights and density; and tenure and mix and total numbers of homes.	1	GUA, The Hammersmith Society	No change proposed. The Development Capacity Study fulfils the requirements of the Strategic Housing and Employment Land Availability Assessment. Housing land has been identified on sites that are not identified as remaining as Strategic Industrial Location, evidenced through OPDC's Industrial Land Review, or land identified as open space, or required for current or future infrastructure provision.
OSP4	Luxury housing market is collapsing so is this type of development at Old Oak realistic.	1	GUA	No change proposed. OPDC's and the GLA's strategic Housing Market Assessments identify a huge need for housing in London to meet current and future demands. Policy SP4 promotes the provision of housing for a range of affordabilities and the particular need for affordable housing. The local plan does not explicitly promote luxury flats.
OSP4	DCS lacks careful and detailed analysis of the capacity in the OPDC area to deliver new homes and jobs based on local context. Only considers London Plan targets	1	GUA	No change proposed. There is a need for OPDC to demonstrate conformity with the London Plan, which identifies the OPDC area as needing to deliver a minimum 25,500 homes and 65,000 jobs, but OPDC's Development Capacity Study undertakes an independent analysis of the areas ability to deliver new homes and jobs. This has considered factors such as public transport accessibility and local context to derive appropriate densities.

OSP4	It is not clear how much mixed development will be delivered.	1	GUA	No change proposed. The strategic policies identify the overall numbers of homes and jobs that must be delivered in the plan period. The associated figure identifies where these should be located.
OSP4	Details on the methodology/assumptions for calculating employment densities should be provided.	1	GUA	No change proposed. Details on this were included in OPDC's Development Capacity Study and this continues to be the case.
OSP4	Building heights should consider impact on Harlesden	1	Harlesden Neighbourhood Forum	Change proposed. Harlesden is identified as a sensitive location in Policy SP9. The Willesden Junction place policy identifies the need for development to be generally lower in height near to Tubbs Road.
OSP4	High density area around Willesden Junction Station exceeds London Plan guidance.	1	Harlesden Neighbourhood Forum	No change proposed. To achieve the minimum 25,500 homes target identified for the area in the London Plan, in parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG. The Willesden Junction station has high public transport access and subject to impacts on sensitive locations being appropriately minimised, it is an appropriate location for high densities and tall buildings.
OSP4	High density development should be modelled to address harmful impact on existing communities to the north.	1	Harlesden Neighbourhood Forum	No change proposed. The Local Plan requires development to respond appropriately to the existing properties in Harlesden, which constitute a sensitive location. Modelling work would need to be undertaken as part of any proposal to ensure the amenity of existing properties is appropriately addressed.

OSP4	Illustrations do not show enough mid-rise options. Wider blocks could help deliver these.	1	Harlesden Neighbourhood Forum	No change proposed. It is not clear what is meant by mid-rise, but some place policies in the Local Plan identify the need for densities to be lower in specified locations. Wider blocks may compromise internal daylight and sunlight levels and are therefore not explicitly supported in the Local Plan.
OSP4	Building heights need further testing in light of heritage assets	1	Harlesden Neighbourhood Forum	Change proposed. OPDC has undertaken a Heritage Strategy to identify the areas heritage assets. These assets have been listed in the relevant place policies and policy guidance is provided detailing how development should respond to these assets. Heritage is identified as a sensitive location in Policy SP9 and the policy also requires development to conserve and enhance the historic environment and ensure these help shape local character.
OSP4	Consider impact of development on setting of Kensal Green Cemetery.	1	Harlesden Neighbourhood Forum	Change proposed. OPDC's Heritage Strategy identifies Kensal Cemetery as a heritage asset. Policy SP9 requires development to respond appropriately to heritage assets (defined as sensitive locations). OPDC's Views Study identifies key views in St Mary's Cemetery. Policy D7 requires development to contribute positively to the character and composition of identified key views. The Scrubs Lane Direction of Travel document also assesses the proposed approach to densities and building heights along Scrubs Lane (the closest area of OPDC to Kensal Cemetery) against key views identified in Kensal Cemetery.

OSP4	A more nuanced approach to building heights should be explored following further analysis and keen to feed into this.	1	Harlesden Neighbourhood Forum	Change proposed. The revised Local Plan does take a more nuanced approach. High level policy guidance is contained in Policy SP9, but where relevant and appropriate, the place policies provide more specific policy guidance on appropriate densities and building heights in specific locations.
OSP4	The plan should be explicit on the need to establish a mix of building heights and forms	1	LB Ealing	No change proposed. The plan does not explicitly require a mixture but in the round, the policies promote variety. Policy SP9 requires development to respond to local character and context, deliver a locally distinctive townscape and inter alia, deliver a range of densities with higher densities and taller buildings in areas of high public transport access.
OSP4	identify lower densities adjacent to the canal in Park Royal and Old Oak West	1	LB Ealing	Change proposed. The Grand Union Canal place policy refers to the need for lower densities next to the Canal in Park Royal.
OSP4	Too much is being decided too soon, when large areas will not be available/built for a long time. The impact of the first phase of development should be tested before the Plan is finalised.	1	Midland Terrace Resident's Group	No change proposed. Local Plans need to set the long-term strategy for the delivery of development in the area. The Local Plan is more detailed and specific in relation to sites which are likely to come forward in early development phases, but policy guidance is more flexible in areas where development is known to be much longer term. Although the Plan covers 20 years, OPDC has the ability to revisit the policies in the Local Plan and update policies, where there is a need. OPDC's Authority Monitoring Report monitors the appropriateness of policies and identifies whether a review of the Local Plan is required.

OSP4	There are very few tall building in this part of London with emerging taller buildings causing concern with local people	1	Midland Terrace Resident's Group	No change proposed. OPDC considers that parts of the area will be appropriate for tall buildings. The policy approach looks to focus these in areas of high public transport access and ensure that any tall buildings are designed to a high quality. Policy guidance for the appropriateness of tall buildings is set out in Policy D5 and guidance of the appropriate locations for tall buildings is set out in Policy SP9 and in the place policies.
OSP4	Oaklands applications should be refused	1	Midland Terrace Resident's Group	No change proposed. This comment does not relate to Local Plan policy, but instead to an individual planning application. The application would have undergone its own separate public consultation and representations would have been considered in the determination of the planning application.
OSP4	Does not explain how the 'sensitive edges' shown at Figure 18 have been mapped and how associated densities been derived.	1	Midland Terrace Resident's Group	No change proposed. Sensitive edges have been redefined as sensitive locations. Policy SP9 requires development to respond appropriately to the setting of these sensitive locations. Further details on how this should be achieved are, where relevant, provided in the place policies.
OSP4	Existing residential areas are located next to the highest density.	1	Midland Terrace Resident's Group, Old Oak Interim Forum.	No change proposed. Policy SP9 requires that development responds appropriately to sensitive locations. Existing residential areas have been identified as sensitive locations.

OSP4	Development too dense and lacks rationale as well as thought for communities	1	MP for Hammersmith	No change proposed. The overarching homes and jobs targets are set out in the Mayor's London Plan, which identifies that the area has capacity to deliver a minimum 25,500 homes and 65,000 jobs. OPDC's Development Capacity Study builds on this and undertakes a more detailed site by site assessment of capacity. Details on the methodology for this are set out in the Development Capacity Study. This accords with national guidance.
OSP4	Tall buildings will change the character of west London	1	Old Oak Interim Forum	No change proposed. OPDC considers that parts of the area will be appropriate for tall buildings. The identification of the OPDC area as being appropriate for tall building accords with London Plan policy 7.7. The Local Plan policy approach looks to focus these in areas of high public transport access and ensure that any tall buildings are designed to a high quality. Policy guidance on the appropriateness of tall buildings is set out in Policy D5.
OSP4	Policy should provide guidance for building typologies with a preference for low rise high density built form	1	Old Oak Interim Forum	No change proposed. The Local Plan identifies that development should provide a range of building forms, including the potential for tall buildings.
OSP4	Concerns regarding high densities and tall buildings	8	Old Oak Interim Forum	No change proposed. The entire OPDC area is covered by Opportunity Areas, meaning that in accordance with the London Plan, it is appropriate for high density development and tall buildings. Local Plan policy SP9 recognises the need for development to respond appropriately to sensitive locations and the design chapter contains a series of

				policies aimed at ensuring development delivers high standards of design.
OSP4	Impact of densities	1	Old Oak Interim Forum	Noted. Policy SP9 requires that impacts of densities are appropriately mitigated, by ensuring development responds to local character and context, conserves and enhances the historic environment, ensures appropriate standards of amenity, along with a number of other policy requirements aimed at ensuring high densities secure high design standards.
OSP4	Insufficient policy options provided	1	Old Oak Interim Forum	No change proposed. No alternative options were presented as part of the Regulation 18 consultation as an alternative would not have been consistent with the NPPF or in generation conformity with the London Plan.
OSP4	Figure 18 should be defined as illustrative	1	Old Oak Park	No change proposed. Figure 18 is no longer included in the Local Plan
OSP4	Support for high density development	1	NQP Development Services	Noted.
OSP4	De-designate industrial sites north of Island Triangle	1	Raban Management Ltd and Raban Goodhall Ltd	Change proposed. The site referred to is not shown within SIL in the reg 19 Local Plan.
OSP4	Support recognition of Kensal Cemetery as a sensitive location	1	RBKC	Noted.

OSP4	Welcomes the intensification of uses and is currently exploring this option. OPDC should take into account the characteristics of operator demand, such as logistics, and that less floorspace does not mean fewer jobs.	1	SEGRO	Change proposed. Policy E1 continues to protect industrial floorspace, unless it is this is required to make a more efficient use of space and provided this would not have a significant adverse impact on the overall amount of industrial floorspace in SIL.
OSP4	Densities should be decreased to conform with London Plan.	1	The Hammersmith Society	No change proposed. To achieve the minimum 25,500 homes target identified for the area in the London Plan, in parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG.
OSP4	IWA's preference for the sensitive edge next to the canal would be a variety of density ranges as the current plans for 300 units per hectare will result in the canal having overbearing enclosure.	1	The Inland Waterways Association	Change proposed. The Local Plan identifies the Grand Union Canal as a sensitive location. The Local Plan no longer refers to density ranges. However, the place policies provide more detailed policy guidance of the appropriate building heights along the Grand Union Canal.
OSP4	Should clarify how housing density ranges have been arrived at.	2	TITRA, London Sustainable Development Commission	Change proposed. Density ranges have now been removed from the Local Plan. The plan instead includes homes and jobs targets by place and site allocations with minimum targets. These have been derived from the Development Capacity Study. The place policies also, where relevant and appropriate, provide more detailed policy guidance relating to the appropriate storey heights of buildings.

OSP4	Approach to distributing density is logical but density numbers/tall buildings are not conducive to establishing attractive communities. Building heights should be openly discussed.	1	TITRA	No change proposed. The entire OPDC area is covered by Opportunity Areas, meaning that in accordance with the London Plan, it is appropriate for high density development and tall buildings. Local Plan policy SP9 recognises the need for development to respond appropriately to sensitive locations and the design chapter contains a series of policies aimed at ensuring development delivers high standards of design.
OSP4	Highest density/buildings around the HS2 station will have a major negative impact on Wells House Road properties.	1	Wells House Road Residents Association	No change proposed. The Local Plan continues to identify Well House Road as a sensitive location. Although the area around Old Oak Common station is identified as appropriate for tall buildings, there would be a need for any developer to appropriately consider impacts on the properties on this road and ensure development responds appropriately to it.
OSP4	Over shadowing study on Wells House Road requested	1	Wells House Road Residents Association	Noted. In accordance with OPDC's validation list, any developer would need to undertake a daylight and sunlight and microclimate assessment where the scale of buildings proposed has the potential to affect light to sensitive neighbouring uses or the design of development has the potential to restrict internal levels of natural light for proposed residential units.
OSP4	Higher densities could be appropriate in gateway locations.	1	Westkite Limited	No change proposed. The Local Plan does not identify 'gateway' locations, but does identify that tall buildings are appropriate in areas of high public transport accessibility and in other identified locations in the places chapter.

OSP4	Assumptions for housing modelling should be defined	1	Local Resident	Noted. The assumptions for housing modelling are provided within OPDC's Development Capacity Study. This study has been undertaken in accordance with national guidance.
OSP4	If available land decreases will targets change? Has this happened previously?	1	Local Resident	Noted. If available land were to decrease then targets would appropriately change to acknowledge this.
OSP4	Historic high rise developments have not been successful. Developments should mirror what is already works well in London and be of a smaller scale and provided for local people.	2	Local Resident	No change proposed. There are many examples of high rise developments working well. OPDC's Precedents Study identifies case study examples of both high rise and high density developments which have been successful. The entire OPDC area is covered by Opportunity Areas, meaning that in accordance with the London Plan, it is appropriate for high density development and tall buildings. Local Plan policy SP9 recognises the need for development to respond appropriately to sensitive locations and the design chapter contains a series of policies aimed at ensuring development delivers high standards of design.
OSP4	Current plans will lead to loss of light for existing residents.	1	Local Resident	Noted. In accordance with OPDC's validation list, any developer would need to undertake a daylight and sunlight and microclimate assessment where the scale of buildings proposed has the potential to affect light to sensitive neighbouring uses or the design of development has the potential to restrict internal levels of natural light for proposed residential units. This would need to demonstrate the impact of loss of light and any impacts would be considered in the determination of the planning application

OSP4	Should increase the green buffer strip between Old Oak Lane Conservation Area and SIL to protect conditions for existing residents.	1	Local Resident	Change proposed. The Channel Gate place policy identifies the need for development to mitigate the impacts of industrial activities on the Island Triangle, Midland Terrace, Shaftsbury Gardens and The Collective and deliver and /or contribute to the expansion and enhancement of Old Oak Community Gardens.
OSP4	Should assess the impact on areas which are on the edge of the development such as Kensal Rise/ Chamberlayne Road.	1	Local Resident	Noted. Existing residential areas are identified as sensitive locations and Policy SP9 requires development to respond appropriately to these. Policy D5 provides detailed policy guidance on the appropriateness of tall buildings and the need to make a positive contribution to the skyline and not adversely impact surrounding properties in terms of overshadowing, microclimate etc. Policy D7 requires development that will impact on a key view to contribute positively to the character and composition of identified key views and define, assess, justify assess their impact on any other views relevant to the site and clearly demonstrate how it delivers a positive contribution to the relevant key views.
OSP4	Support for tall buildings	1	Local Resident	Noted.

OSP4	Tall buildings will have a negative impact on people's health	1	Local Resident	No change proposed. The entire OPDC area is covered by Opportunity Areas, meaning that in accordance with the London Plan, it is appropriate for high density development and tall buildings. Local Plan policy SP9 recognises the need for development to respond appropriately to sensitive locations and the design chapter contains a series of policies aimed at ensuring development delivers high standards of design. This includes the need to ensure development does not adversely impact on the amenity of their surroundings in terms of microclimate, overshadowing and daylight and sunlight, wind turbulence, air quality, noise, lighting and reflected glare. In accordance with OPDC's validation list, any developer would need to undertake a daylight and sunlight and microclimate assessment.
OSP4	Flats can meet housing need but maybe not for family housing	1	Local Resident	Noted. The Local Plan (policy H3) requires development to deliver 25% of units as family housing. Policy H4 requires that family units are located at ground or 1st floors and have access to private of communal space. There are many good examples in London of delivering family housing in high density blocks in this way, often in the form of duplexes. Policy H4 also requires that where family housing is located on other levels, developers should provide convenient access to secure private and/or communal open space that is suitable for children.

OSP4	Height limit should be provided	1	Local Resident	Change proposed. The Local Plan generally does not set height limits applicable everywhere, but the Place policies include policy guidance on storey heights, where it is considered relevant and appropriate to do so.
OSP4	Mix of building heights is supported	1	Local Resident	Noted
OSP4	Willesden Junction and HS2 Stations should have tall buildings	1	Local Resident	No change proposed. The Local Plan Policy SP9 identifies the potential for tall buildings in areas of high public transport access. This would include the areas around the Willesden Junction and HS2 stations. The policy also notes the need for development to respond appropriately to sensitive locations, including in these locations. Policy D5 also sets out detailed criteria for how proposals for tall buildings would be assessed.
OSP4	Support for flats rather than terrace housing	1	Local Resident	Noted
OSP4	Support for family housing	1	Local Resident	Noted
OSP4	Support for decking HS2 to deliver more development	1	Local Resident	Noted.
OSP4	Prioritise development of brownfield land	1	Local Resident	Noted
OSP4	Define potential impacts of catalyst uses on densities	1	London Sustainable Development Commission	Change proposed. Policy TCC8 requires proposals for catalyst uses to be assessed against a set of criteria. One of which includes the need for the catalyst use not to impact on the delivery of OPDC's housing targets
OSP4	Would like to work with OPDC to discuss sustainability at high densities and on low carbon tech and economies.	1	London Sustainable Development Commission	Noted. OPDC has been working closely with the LSDC in the development of the Reg 19 Local Plan.

OSP4	Planning for high density requires a systemic approach if low carbon and other desired outcomes are to be achieved.	1	London Sustainable Development Commission	Noted.
OSP4, SI1	Why have tall buildings as a central part of the planned development and social infrastructure	1	Local resident	No change proposed. The entire OPDC area is covered by Opportunity Areas, meaning that in accordance with the London Plan, it is appropriate for high density development and tall buildings. Local Plan policy SP9 recognises the need for development to respond appropriately to sensitive locations and the design chapter contains a series of policies aimed at ensuring development delivers high standards of design. This includes the need to ensure development does not adversely impact on the amenity of their surroundings in terms of microclimate, overshadowing and daylight and sunlight, wind turbulence, air quality, noise, lighting and reflected glare. In accordance with OPDC's validation list, any developer would need to undertake a daylight and sunlight and microclimate assessment. There is a need for development to provide appropriate social infrastructure to support the needs of the new population. Social infrastructure is required to meet the needs of the new community and ensure that impacts on existing services are appropriately mitigated.

OSP1	How will local people benefit and be supported?	1	Local resident	Noted. The Local Plan includes a set of policies aimed at supporting sustainable development and regeneration in the area. Proposals that accord with the policies would bring a number of benefits to local people, including new housing, including affordable housing, new jobs, new ancillary uses including shops and social infrastructure and other infrastructure, including new open space, transport infrastructure improvements and utilities infrastructure.
OSP4	Supports high density development	1	Local resident	Noted
OSP5	Support for QPR stadium, vision should refer to a stadium, stadium will be a hub for the community and catalyst for wider development	2185	Local residents	Noted. Policy SP6 supports proposals for catalyst uses, which includes sports stadia. Any proposal for a sports stadium would need to be assessed against Policy TCC8 (Catalyst Uses) along with any other relevant planning policies

4. Place Policies

Section of Local Plan comments relates to	Issue summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
4. Places	The figures within the Places chapter should include street names	1	Diocese of London	Change proposed. Relevant figures will be labelled with street names.
4. Places	Welcome proposals for a Victoria road masterplan	1	Midland Terrace Residents Association	Noted.
4. Places	Each of the 10 places should identify the key barriers or challenges that may need mitigation if each area is to be accessible and inclusive	1	Hammersmith and Fulham Disability Forum	Noted. OPDC's Public Realm, Walking and Cycling Strategy provides guidance for a new and improved street network. The Scrubs Lane and Victoria Road and Old Oak Lane development principles documents provide more detailed proposals for these locations. These recommendations ensure that the public realm is accessible and inclusive for all.
4. Places	Support the concept of having places in the OPDC local Plan	4	Historic England, Midland Terrace Resident's Group, TITRA, Old Oak Interim Forum, Old Oak Park (DP9)	Noted.
4. Places	Disagree with the Local Plan including place specific policies	1	Resident	No change proposed. Place policies are considered important to successfully deliver place-making and sustainable development.

4. Places	Each place should establish its own character guidance to avoid a monotony between different places	1	Resident	Noted. Place policies continue to be guided by individual place visions to support local character and delivery of lifetime neighbourhoods.
4. Places	Each place policy should identify the requirements for shops, schools and GPs	1	Resident	Change proposed. Locations for town centres and social infrastructure uses have been identified in the relevant place policies.
4. Places	Should clarify that community hubs need to include space for places of worship	1	Diocese of London	Noted. Social infrastructure is defined to include places of worship.
4. Places	Water management measures identified in the IWMS should be embedded within the relevant place policies	1	Environment Agency	Change proposed. Where relevant, place policies refer to water management proposals.
4. Places	Green infrastructure measures should be embedded within the relevant place policies	1	Environment Agency	Change proposed. Where relevant, place policies refer to green infrastructure proposals.
4. Places	Could entitle final sections of policies 'natural and historic environment' and provide guidance on heritage assets here.	1	Historic England	Change proposed. Within each place policy guidance for heritage and character is provided.
P1	There should be a western access provided to the HS2 station	1	1 Resident	Noted. The current design of Old Oak Common Station permitted by the HS2 (London- West Midlands) Act identifies an entrance to the west. This is reflected in policies P1 and P1C1.
P1	Support Policy P1	4	Ballymore Group, Old Oak Park (DP9), Osbourne Investments Ltd (Boden House) (Savills), TfL	Noted

P1	Is there a subtle distinction between the words 'contribute to' and 'provide' in o) and r) in the Policy i.e. 'provide' infers the development will be expected to fully fund the bridge over the canal but only part fund the delivery of other infrastructure?	1	Diocese of London	Noted. Contributing to the delivery of an aspect of the built environment refers to a number of stakeholders facilitating its delivery.
P1	It may be appropriate to develop planning briefs for smaller areas once the phasing and site sub-division becomes clearer.	1	Diocese of London	Noted. Policy P1C1 sets out further guidance for the Old Oak Common Station.
P1	Should keep the nature reserve in its current location and its biodiversity enhanced	8	Diocese of London, Midland Terrace Resident's Group, Old Oak Interim forum, Hammersmith and Fulham Historic Buildings Group, TITRA, 2 residents	Noted. Policy P1 seeks to enhance Birchwood Nature Reserve if retained in its current location, or reprovided in accordance with policies EU1 and EU2.
P1	Support points j) and k) of the policy	1	Friends of Wormwood Scrubs	Noted
P1	See no need for direct 24 hour access from the Old Oak Common station to the Scrubs.	2	Friends of Wormwood Scrubs, Old Oak Interim Forum	No change proposed. To support people accessing destinations, including Old Oak Common Station and Wormwood Scrubs legible, accessible, comfortable and 24 hour public routes to Wormwood Scrubs are identified.

P1	In v), should change wording from 'celebrating' Wormwood Scrubs to something more controlling and binding	2	Friends of Wormwood Scrubs, Old Oak Interim Forum	Change proposed. Policy P1 refers to the delivery of a range of building heights including responding to Wormwood Scrubs as Metropolitan Open Land.
P1	4.19 - The Friends of Wormwood Scrubs should be included among other key partners	1	Friends of Wormwood Scrubs	Noted. The supporting text to policy P12 refers to working with the Friends of Wormwood Scrubs.
P1	Object to figure 28 showing buildings next to the northern edge of the Scrubs	1	Friends of Wormwood Scrubs	Change proposed. This figure is now removed from the Local Plan.
P1	It would be more accurate to say that work is underway to assess the feasibility of a potential link from Crossrail to the West Coast Main Line as set out in the Secretary of State's announcement in August 2014.	2	Greater London Authority, TfL	Noted. The supporting text to P7 refers to the need safeguarding being subject to the link being feasible.
P1	Support other wording on London Overground stations and connections in Policy P1	2	Greater London Authority, TfL	Noted
P1	Should amend j) as follows to encapsulate potential built heritage interest: 'Be mindful of existing residential communities at Wells House Road, Midland Terrace/Shaftesbury Gardens, the adjacent amenity and ecological open spaces of Wormwood Scrubs and Grand Union Canal and local heritage interest.'	1	Historic England	Change proposed. Policy P1 has been amended to conserve and enhance the Grand Union Canal Conservation Area, ensure development is informed by the local historic character. It also requires buildings to appropriately respond to Wormwood Scrubs and existing residential areas.

P1	In part v) suggest 'Celebrate the unique character and qualities of Wormwood Scrubs and the Grand Union Canal, including the distinctive attributes and significance of the canal and the positive contribution of the associated nature reserve ...'	1	Historic England	Change proposed. Policy P1 has been amended to conserve and enhance the Grand Union Canal Conservation Area.
P1	Currently there is no certainty on the deliverability of the link described in P1 Streets p) and q). Given this HS2 believes that to be sound the draft Local Plan should recognise that the link is not certain and it would be prudent for alternative routes to be identified.	1	HS2 Ltd	Change proposed. Policies P1 and P1C1 have been amended to recognise that flexibility is required for delivering this route and identify additional alternative routes.
P1	OSD feasibility is not proven so the Local Plan should acknowledge this and plan for scenarios with lower levels of OSD.	1	HS2 Ltd	Change proposed. Policies P1 and P1C1 have been amended to also refer to optimising development 'around' the station.
P1	The policy should include reference to the sensitive edge along the southern edge of Old Oak South at Long Drive where it adjoins an existing residential area.	1	Ealing Council	Change proposed. Policies P8 and SP9 reference and depict the existing residential area along Long Drive as a sensitive location.
P1	J) should say that the OPDC will 'resist development which impacts adversely on these longstanding residential enclaves' The same applies to P1 (k) albeit that this is more specific.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. Policies D5 and D6 provide guidance for delivering appropriate standards of amenity for building users. Existing residential areas are identified as sensitive locations in policy SP9.

P1	On QP1a, a more gradual approach to detailed planning this area is suggested, concentrating initially on the HS2/Crossrail interchange and its immediate surroundings.	3	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Change proposed. P1C1 provides further detailed guidance for Old Oak Common Station.
P1	It seems premature to define neighbourhoods in Old Oak South at this stage, if detailed planning proposals are not likely to come forward before 2026.	4	Midland Terrace Resident's Group, Old Oak Interim Forum, 2 residents	Noted. The Local Plan does not define neighbourhoods in Old Oak South but includes a cluster policy for Old Oak Common Station and Old Oak Common Lane station.
P1	A major university would be a welcome catalyst here	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. Policy SP6 and policy TCC8 provide guidance for managing the delivery of catalyst uses, including higher education establishments.
P1	Support approach to land uses in P1	1	Old Oak Interim Forum	Noted
P1	Support approach to P1 l), m) and n)	1	Old Oak Interim Forum	Noted
P1	On P1t) he Draft Plan gives no indication as to how 'better connections to Kensal Canalside Opportunity Area' can be achieved.	1	Old Oak Interim Forum	Noted. Policy SP7 and P10 identify the location of new and improved routes to Kensal Canalside within the OPDC area. OPDC will work with RBKC to ensure delivery of routes are coordinated.
P1	Should focus on coordination of infrastructure in North Acton place rather than plan in detail the Old Oak South place	1	Old Oak Interim Forum	No change proposed. Policy P7 provides guidance for delivering new and improved social and transport infrastructure within North Acton.

P1	Figure 24 on p.55 should be explicitly titled 'Illustrative Masterplan for Old Oak South'.	1	Old Oak Park (DP9)	Change proposed. The Local Plan appendix identifies that maps in the document are indicative.
P1	We believe reference needs to be added to the section sub-headed 'Environment' to reflect the fact that Old Oak South could potentially facilitate the delivery of an energy centre.	1	Old Oak Park (DP9)	Noted. Policy P1 states the need for proposals to contribute to the delivery of infrastructure requirements set out in OPDC's Infrastructure Delivery Plan. This includes a decentralised energy network.
P1	The Boden House site is highly suitable for redevelopment to provide a mix of uses, including town centre and employment uses, as well as residential accommodation	1	Osbourne Investments Ltd (Boden House) (Savills)	Change proposed. Policy P7 identifies the wider area of Acton Wells (including Boden House) for mixed-use development. This is also reflected in the site allocation for the site.
P1	It should also be noted that the Boden House has been agreed by HS2 not to be necessary for construction works and will therefore not be acquired by HS2.	1	Osbourne Investments Ltd (Boden House) (Savills)	Change proposed. OPDC's Development Capacity Study (2017) reflects this by identifying the potential for the Boden House site to be developed separately from the HS2 works.
P1	The regeneration of the Boden site would be a catalyst for the regeneration of the area	1	Osbourne Investments Ltd (Boden House) (Savills)	Noted.
P1	Support indicative capacity targets for homes and jobs in P1	3	Osbourne Investments Ltd (Boden House) (Savills), 2 residents	Noted.

P1	Boden House site should be identified as being appropriate for a higher density	1	Osbourne Investments Ltd (Boden House) (Savills)	Noted. Policy P7 does not provide site specific guidance. However, areas around North Acton Station are identified as being a potential location for tall buildings
P1	Existing context section should reference the submission of the Oaklands application. The application should also be mentioned at 4.17 [59] in respect of development on the fringes of Old Oak South and at 4.21 [60] in respect of the area's capacity of housing and jobs.	2	QPR (NQP Development Services), 1 resident	Change proposed. Following granting of planning permission, delivery timescales of development across Old Oak, and adjacency to Old Oak Common Lane, Oaklands is now defined to be within the place of Old Oak Lane and Old Oak Common Lane. Policy P8 reflects the permitted scheme.
P1	The plan for Old Oak South at Figure 24 [55] that the Oaklands site should be marked as a potential catalyst for regeneration. This is due to the fact that the application represents early delivery and regeneration in Old Oak South.	1	QPR (NQP Development Services)	No change proposed. Oaklands does not meet the criteria for a catalyst as set out in SP6, TCC8 and the glossary. However, it is referenced in policy P8 as an early development scheme supporting placemaking.
P1	Reference to new connections between the Old Oak and Kensal Canalside Opportunity Areas should be made more strongly and explicitly in Policy P1(t).	1	Royal Borough of Kensington and Chelsea	Change proposed. Policy P10 now clearly references new and improved connections to Kensal Canalside Opportunity Area.
P1	The Local Plan should provide further detail on the approach to the Westway industrial estate	1	SEGRO	Change proposed. Policy P8 now provides specific spatial guidance for the Westway Estate for land uses, building heights, connections, local heritage and phasing.

P1	Para 4.9 should change - Old Oak South area includes potential for Old Oak Common lane station on the Northern Line rather than the West London line	1	TfL	Change proposed. Error corrected.
P1	It is essential that the policy for Place P1 acknowledges the need to address the operational constraints that are created by the depot, and how the area's development responds to the site's use as a functioning depot.	1	TfL	Change proposed. Policy P1 now provides guidance recognising the need to work with stakeholders to support the relocation, reconfiguration and/or development over railway infrastructure.
P1	Part l) should be made clearer about how a viable option can be planned for Old Oak South, having regard to the findings of the Crossrail depot study which has been carried out by TfL and reported to OPDC Board.	1	TfL	Change proposed. Policy P1 now provides guidance recognising the need to work with stakeholders to support the relocation, reconfiguration and/or development over railway infrastructure.
P1	Support proposal for catalyst uses in Old Oak South	1	TITRA	Noted.
P1	Object to making Wormwood Scrubs more accessible	1	TITRA	No change proposed. To accord with the Wormwood Scrubs Act, policy P12 seeks to improve access to the Scrubs for all Londoners through new and improved sensitive walking and cycling routes from surrounding areas.
P1	The IEP depot could continue to be safeguarded as SIL if it is not being brought forward in the Plan period, but would this mean densities elsewhere would have to be	3	Residents	No change proposed. The IEP will continue to be proposed to be removed from SIL designation in accordance with policy SP5 and the policy direction set by the London Plan and Old Oak and Park Royal Opportunity Area Planning Framework.

	increased? OPDC need to clearly set out the calculations for this			
P1	Existing communities should be incorporated into the plans for Old Oak South and not isolated	1	Resident	Change proposed. Policy P1 seeks to strengthen local identity and character by ensure future character of development is informed by surrounding residential areas. Policy SP7 and T1 provide guidance for connecting existing areas.
P1	OPDC should oversee/mitigate the impacts of what is being proposed by HS2	1	Resident	Noted. Following the enactment of the HS2 London-West Midlands Act, OPDC is working closely with HS2 to support the delivery of Old Oak Common Station while mitigating harm on amenity during the determination of proposals through the Schedule 17 planning regime.
P1	Should encourage pop-up/meanwhile activities on the early development sites in Old Oak South	1	Resident	Change proposed. Policy P1 by encouraging meanwhile uses across Old Oak South.
P1	Could potentially relocate the nature reserve, but need to maintain an area of wilderness/biodiversity in Old Oak South	2	2 Residents	Noted. Policy P1 seeks to enhance Birchwood Nature Reserve if retained in its current location, or reprovided in accordance with policies EU1 and EU2.
P1	Support identification of commercial centre in Old Oak South	1	Resident	Noted.
P1	Should look at More London as a good precedent for public spaces around commercial premises	2	2 Residents	Noted. This proposal has informed OPDC's Precedent Study.

P1	Paddington could be a decent precedent for commercial development with supporting cafes	1	Resident	Noted. This proposal has informed OPDC's Precedent Study.
P1	Criticism of Paddington as a good precedent	1	Resident	Noted. This proposal has informed OPDC's Precedent Study.
P1	There is a significant drop from the Oaklands site and this needs to be considered/mitigated	1	Resident	Noted. The proposed movement network set out in policy SP7 accounts for level changes. This has been informed by OPDC's Public Realm, Walking and Cycling Strategy.
P1	The Old Oak Common HS2 station lacks design quality/ OPDC needs to ensure the design is better	4	Hammersmith and Fulham Historic Buildings Group, 3 Residents	Noted. Policy P1C1 seeks to work with HS2 Limited to deliver an exceptional, world-class, 21st Century station inspired by the UK's and local railway history. A joint design review panel has been established between HS2 Limited and OPDC to inform the design of the station.
P1	The link between Old Oak High Street and Hythe Road station needs to be a covered way for the winter months	1	Resident	No change proposed. This approach is not considered to support the delivery of a high quality movement network.
P1	Need to show existing open spaces along Victoria Road	1	Resident	Change proposed. Publicly accessible open spaces along Victoria Road are shown in policy P7.
P1	Should identify a series of neighbourhoods for Old Oak South	2	Hammersmith and Fulham Historic Buildings Group, 1 Resident	Noted. Policy P1 and P1C1 set out the aspiration to deliver a network of new neighbourhoods. They do not define the neighbourhoods. This reflects the delivery timeframes.

P1	Support high densities around Old Oak Common station	1	1 Resident	Noted.
P2	The Hythe Road area currently houses an estimated 250-300 spaces for creatives/artists/makers. This cluster should be recognised in the Local Plan and steps taken to protect it.	5	Old Oak Interim Forum, 4 residents	Change proposed. Policy P2 refers to the need to support the existing creative uses floorspace in accordance with policy E1.
P2	Would object to any direct or indirect reference to the potential for a sports stadium in Old Oak North.	1	Old Oak Park (DP9)	Noted. Policies SP9 and TCC8 provide guidance for managing a range of catalyst uses.
P2	Need improved connectivity/permeability across Old Oak North, prioritising different modes and to alleviate strain on existing roads.	1	Resident	Noted. Policies SP7 and P2 set out the proposed movement network for the area and how these integrate with surrounding streets for a range of transport modes.
P2	Need to set clear guidance for development in and around Willesden Junction station	1	Brent Council	Change proposed. Policies P11 and P11C1 now provide specific guidance for Willesden Junction Station.
P2	There is scope to develop above the railway lines at Willesden Junction, which as significant advantages in terms of supporting the achievement of housing and employment targets and providing connections to the north	2	Brent Council, 3 residents	Change proposed. Policy P11 recognises the potential for over station and track development by working positively with stakeholders to support the relocation, reconfiguration and/or development, over and around, existing and future railway infrastructure.

P2	Pedestrian and cycle walkways from Willesden Junction into Old Oak North need to be of the highest quality and can remain in use when new streets are built	2	Brent Council, 1 resident	Change proposed. Policy P11 seeks to deliver new and improvement movement routes to Old Oak North across all phases of development, including Old Oak High Street.
P2	The Local Plan currently omits an important connection throughout from Willesden Junction to the east to Harrow Road and Harlesden. Figure 29 needs amending	3	Brent Council, 2 residents	Change proposed. Policy P11 and supporting figures now depict connections to Harrow Road and Harlesden.
P2	Should state railway lines to the 'east with Scrubs Lane beyond', rather than west.	1	Brent Council	Change proposed. Policy P11 now refers to connections to the east and west of Willesden Junction Station.
P2	Typo – 'a mix of town centre and catalyst uses,' rather than 'a mix of town centres.'	1	Brent Council	Noted.
P2	The vision needs to emphasise the retail offer in Old Oak North is to serve the new population, and make specific reference to complementing the offer at Harlesden Town centre.	1	Brent Council	Change proposed. Policy P11 requires proposals to contribute to the delivery of Old Oak High Street as part of a major town centre by delivering a range of permanent town centre uses that meet needs of employees, residents and interchange passengers. It also requires the submission of a Harlesden Enhancement Strategy to support the functioning of Harlesden town centre.
P2	Figure 29 should make it clearer where development around Willesden Junction station can be provided	1	Brent Council	Change proposed. All diagrams supporting place policies are indicative. Figures supporting policy P11 identify potential broad locations for development.

P2	Should be ambitious in terms of the design of the bridge over the West Coast Main Line	1	Brent Council	Noted. Policy SP7 sets out the need for Old Oak High Street, including the bridge, to be of a high quality.
P2	It's assumed the boundary to the north of Willesden Junction is identified as a sensitive edge but this is not clear in Figure 29.	2	Brent Council, 1 resident	Change proposed. Figures supporting policy P11 depict the existing residential area to the north as a sensitive location. SP9 also depicts these as a sensitive location.
P2	Development should be required to improve connections to the station both in the short, medium and long term.	1	Brent Council	Change proposed. Policy P11 now sets out the aspiration for early delivery of routes from Willesden Junction to surrounding areas.
P2	The policy should require development to facilitate the delivery of bus, cycle and pedestrian routes throughout the development.	1	Brent Council	Noted. Policies SP7 and P2 set out the proposed movement network for the area and how these integrate with surrounding streets for a range of transport modes.
P2	Old Oak North is within an area of open space deficiency; therefore it is essential the policy specifies the quantum of open space needed to provide sufficient access to the new community.	1	Brent Council	Change proposed. Policy P2 requires proposals to contribute to the delivery of one full and one partial Local Park and a range of smaller open spaces within Old Oak North.
P2	New bridge over the West Coast Main Line should be vehicular and incorporate a bus route	3	Brent Council, QPR (NQP Development Services), 1 resident	Noted. Policy SP7 identifies that Old Oak High Street, including the bridge, delivers high quality routes for walking, cycling and where feasible buses and other vehicles.
P2	A large open space is required to address need. Larger open spaces allow for a wider range of recreational and sporting activities,	6	Brent Council, Hammersmith and Fulham Council, Hammersmith	Change proposed. Policy P2 requires proposals to contribute to the delivery of one full and one partial Local Park and a range of smaller open spaces within Old Oak North.

	and thus promote both mental and physical health and well-being.		and Fulham Historic Buildings Group, 3 residents	
P2	Development should provide a continuous walking and cycling route along the north side of the canal	9	Brent Council, Diocese of London, Old Oak Park (DP9), Hammersmith and Fulham Historic Buildings Group, 5 residents	Change proposed. Policy P3 requires development to contribute to the delivery of a continuous walking and cycling route along the north of the canal within Old Oak.
P2	Bridging over the West Coast Main Line would increase the development capacity of the area	2	Brent Council, Ealing Council	Noted.
P2	Support the Local Listing of Car Giant, 44-45 Hythe Rd, London NW10 6RJ (the former Rolls Royce Motors building of 1939).	8	Brent Council, Canal and River Trust, Hammersmith and Fulham Historic Buildings Group, Diocese of London, Historic England, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Noted. This information will be used to inform the proposed local list. The local list will be consulted on in due course, alongside the progression of the Local Plan.

P2	Need to be more specific about where employment uses should be located in Old Oak North	1	Brent Council	Change proposed. Policy P2 identifies that employment uses should be delivered across Old Oak, including B1a and B1b along Old Oak High Street, a mix of B1 uses within and around the Rolls Royce Building and where high levels of residential amenity cannot be achieved.
P2	Need to consider amenity of residential uses close to employment uses in Old Oak North	1	Brent Council	Change proposed. The supporting text of policy P2 identifies the need for employment uses to mitigate impacts on residential amenity within mixed use development.
P2	Support Policy P2	5	Diocese of London, Old Oak Interim Forum, Old Oak Park (DP9), Hammersmith and Fulham Historic Buildings Group, 1 resident	Noted.
P2	Support identification of potential for catalyst uses in Old Oak North	5	Farrells, Old Oak Park (DP9), QPR (NQP Development Services), TITRA, 1 resident	Noted.
P2	Support improved connections between Willesden Junction and Harlesden	3	Brent Council, Harlesden Neighbourhood Forum, 1 resident	Noted.

P2	The Metroline Depot site is important to the future of Harlesden	1	Harlesden Neighbourhood Forum	Noted. Policies P8 and E1 continue to designate the depot as SIL while requiring development to provide active frontages on to Station Road and positive frontages on to Harley Road to help enhance the surrounding public realm.
P2	Support Old Oak North being identified as an early phase of development	1	Harlesden Neighbourhood Forum	Noted.
P2	Should make more specific reference to the setting of Kensal Green Cemetery and other highly graded heritage assets in the policy	1	Harlesden Neighbourhood Forum	Change proposed. Policy P2 seeks to conserve and enhance existing and proposed heritage assets, including the setting of the Grade 1 Listed Registered Park and Garden Kensal Green Cemetery.
P2	Wording of 4.34 is not sufficiently clear in relation to appropriateness of tall buildings.	1	Historic England	Change proposed. Policy P2 provides indicative guidance for the location of tall buildings within Old Oak North and a height range along the Grand Union Canal reflecting its heritage and environmental designations.
P2	The Policy should be amended should be amended to encompass the historic environment more clearly	1	Historic England	Change proposed. Policy P2 now includes a specific section on heritage and character.
P2	Should identify the potential for the railway embankment in Old Oak North to be converted to a viaduct	2	Ealing Council, Hammersmith and Fulham Historic Buildings Group	Change proposed. Policy P2C1 identifies the potential for the railway embankment to be delivered as a viaduct if proven to be feasible.
P2	Support provision of SME space in Old Oak North	4	Ealing Council, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Noted. This approach is continued in policy P2 and policy E3.

P2	Should not show development on Powerday site if safeguarded	1	Ealing Council	Change proposed. Figures supporting P2 now identify the safeguarding of the Old Oak Sidings waste management site.
P2	Support potential for catalyst uses in the place	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. This approach is continued in policy P2.
P2	Support potential for a series of linked open spaces in Old Oak North rather than one large open space	4	Midland Terrace Resident's Group, Old Oak Interim Forum, 2 residents	Noted. Policy P2 requires proposals to contribute to the delivery of two Local Parks and a range of smaller open spaces.
P2	Concerned that lower densities proposed by Cargiant might result in densities being increased elsewhere	1	Midland Terrace Resident's Group	Noted.
P2	Support vision for P2	2	Old Oak Interim Forum, Old Oak Park (DP9)	Noted. The aspirations of the previous vision are continued within the amended vision for Old Oak North.
P2	Welcome not segregating sites into residential and/or employment zones	1	Old Oak Interim Forum	Noted.
P2	P2v) should make reference to open space and children's play requirements	1	Old Oak Interim Forum	Noted. Policy P2 and EU1 require proposals to contribute to the delivery of one full and one partial Local Park, a range of smaller open spaces and green streets within Old Oak North. Policy D9 provides guidance for the delivery of play space alongside London Plan guidance.

P2	Para 4.46 should refer to Old Oak North rather than Old Oak South	1	Old Oak Interim Forum	Noted. This paragraph has been removed.
P2	Identifying smaller neighbourhoods in Old Oak North is unnecessarily prescriptive at this stage	2	Old Oak Interim Forum, Old Oak Park (DP9)	Noted. Policy P2 and P2C1 set out the aspiration to deliver a network of new neighbourhoods. They do not define the neighbourhoods. This reflects the delivery timeframes.
P2	Do not propose any sites in Old Oak North having site specific policies	2	Old Oak Interim Forum, Old Oak Park (DP9)	No change proposed. Policies P2 and P2C1 set out spatial guidance at a range of scales to support the delivery of Lifetime Neighbourhoods. Site allocations are provided to demonstrate delivery of new homes and economic floorspace.
P2	Figure 29 should be titled 'illustrative masterplan for Old Oak North	1	Old Oak Park (DP9)	Change proposed. The Local Plan appendix identifies that maps in the document are indicative.
P2	B1 (b) and B1 (c) at locations adjacent to transport and/or utilities infrastructure' is too prescriptive and unnecessary considering the inclusion of the requirement in the policy also to 'provide a range of flexible workspace typologies for B1 uses'.	1	Old Oak Park (DP9)	Change proposed. Policy P2 now requires proposals to deliver B1 uses at locations where high levels of residential amenity are not able to be achieved.
P2	preferred policy wording to state 'where feasible, development proposals should seek to incorporate a range of temporary and meanwhile uses.' rather than specifying that early uses should be flexible open workspaces	1	Old Oak Park (DP9)	Change proposed. Policy P2 now requires proposals to deliver a range of active meanwhile uses across Old Oak North.

P2	additional flexibility needs to be added to points g) and h) of the preferred policy option to reflect the fact that the distribution of densities and building heights in the area will be more appropriately determined as proposals come forward	1	Old Oak Park (DP9)	Change proposed. Policy P2 now requires proposals contribute to the delivery of a network of high density neighbourhoods at a variety of building heights. This includes tall buildings in defined broad locations and lower heights adjacent to the Grand Union Canal.
P2	supportive of the flexibility provided in the preferred policy wording and in supporting paragraph 4.40 that new public open space in Old Oak North 'could be formed of one larger space or a series of good sized but smaller spaces across the area'	1	Old Oak Park (DP9)	Noted. Policy P2 requires proposals to contribute to the delivery of one full and one partial Local Park and a range of smaller open spaces within Old Oak North.
P2	Do not think that the Local Plan should seek to specify whether the new park is to be provided as one large space or as a series of linked new spaces across Old Oak North	1	Old Oak Park (DP9)	No change proposed. Policy P2 requires proposals to contribute to the delivery of one full and one partial Local Park and a range of smaller open spaces within Old Oak North.
P2	Justification text should recognise that catalyst uses may enable high density development	1	QPR (NQP Development Services)	No change proposed. Supporting text recognises the role of a range of catalyst uses in helping activate Old Oak North and inform local identity.
P2	The role of the EMR site in facilitating of early delivery of high-density development should be recognised.	1	QPR (NQP Development Services)	No change proposed. The development of EMR site will be subject to the relocation of the active waste use and agreement with Network Rail regarding the removal of relevant rail freight safeguarding.
P2	Densities should be lower near the canal and existing residential areas	2	2 Residents	Change proposed. Policy P2 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes.

P2	Support improvements to Willesden Junction station	1	Resident	Noted.
P2	Should retain the existing footbridge over the West Coast Main Line as it is used by trainspotters	1	Resident	No change proposed. To facilitate the delivery of Old Oak High Street over the West Coast Main Line the existing footbridge will likely be removed.
P2	Support improved access to Old Oak North from the east	1	Resident	Noted. Policies SP7, P2 and P10 provide guidance for new and improved connections from Scrubs Lane into Old Oak North.
P2	Support Cargiant proposals	1	Resident	Noted.
P2	Support residential led development in Old Oak North	1	Resident	Noted.
P2	Support relocation of European Metal Recycling (EMR)	1	Resident	Noted.
P2	Support for through traffic in Old Oak North as it would help with safety and surveillance	1	Resident	Noted. Policies SP7, P2, P7, P8 and P10 provide guidance for new and improved connections across Old Oak North. However, through traffic is envisaged to be limited to public transport.

P2	Support for smaller series of neighbourhoods in Old Oak North	5	Diocese of London, 4 Residents	Noted. Policy P2 and P2C1 set out the aspiration to deliver a network of new neighbourhoods. They do not define the neighbourhoods. This reflects the delivery timeframes.
P2	Willesden Junction main station entrance should be maintained in its current location rather than it being altered and Harlesden residents being given a 'back door' entrance	1	Resident	No change proposed. Policies P11 and P11C1 provide guidance for improving Willesden Junction Station and surrounding areas to deliver high quality access from areas in the north including Harlesden.
P2	Development should be lower density around Willesden Junction station	1	Resident	No change proposed. Policy P11 requires proposals to deliver a range of building heights including tall buildings over and around Willesden Junction Station reflecting the high levels of public transport access and generally lower heights adjacent to Tubbs Road reflecting the area being identified as a sensitive location.
P2	Like the current design of Willesden Junction station	1	Resident	Noted.
P2	Support indicative capacity targets for homes and jobs in P2	2	2 Residents	Noted. Development capacity figures have been updated in light of amendments to OPDC's Development Capacity Study (2017).
P2	Should not retain any buildings in Old Oak North as part of a heritage led approach	1	Resident	No change proposed. Policy P2 provides guidance to conserve and enhance existing and proposed heritage assets while ensuring future local character is informed by local heritage.

P2	Support approach to land uses in P2	1	Resident	Noted.
P2	Should locally list the loading bay units in Salter Street, maybe as performance space or a café. The electricity tower by the railway, some of the artists' studio buildings. The dark red building of c 1890 by the canal (we have seen an internal view and it has an interesting roof structure, might make a good sports facility	1	Hammersmith and Fulham Historic Buildings Group	Noted. This information will be used to inform the proposed local list. The local list will be consulted on in due course alongside the progression of the Local Plan.
P3	Larger stores should be located to the south end of the High Street	1	Grand Union Alliance	No change proposed. Policy P1 identifies that a range of convenience and comparison retail uses could be provided within the portion of the High Street in Old Oak South. It does not specific unit sizes. This would be considered on a case by case basis
P3	The Policy should confirm that the main focus of the new High Street will be north of the canal	1	Old Oak Park (DP9)	No change proposed. Policy SP7 identifies that primary shopping areas should be focused onto the street, along rail stations and key junctions with other key routes.
P3	Should zone the High Street should provide for a mix of functions.	1	1 Resident	Noted. Policy SP7 sets out the varied roles and functions of the High Street.
P3	Old Oak High Street should become a new London 'Rambla' or boulevard	1	Farrells	Noted. Policy SP7 sets out the varied roles and functions of the High Street including providing a high quality movement route for walk, cycling and where feasible buses and other vehicles.

P3	Not convinced that Old Oak High Street would be an attractive proposition to retailers	1	Midland Terrace Resident's Group	No change proposed. OPDC's Retail and Leisure Needs Study identifies that the High Street will be able to support a significant amount of town centre uses floorspace. This is reflected in policies SP6, TCC1, P1 and P2.
P3	Should identify key views along the canal that should be protected	1	Resident	Change proposed. Key views are identified along the Grand Union Canal in policy D7.
P3	Vision should state 'linking Harlesden via Willesden Junction to Old Oak Common Station.'	1	Brent Council	Change proposed. This is referenced in Policy SP7 (connecting people and places)
P3	Should clarify that retail in Old Oak High Street is to serve the needs of the community, not draw trade from afar.	1	Brent Council	Change proposed. Policy SP6 refers to the need for the town centre hierarchy to provide town centre uses that serve the need of development and complement surrounding town centres. The Retail and Leisure Needs Study demonstrates that surrounding centre are likely to significantly benefit from expenditure from the OPDC area, with 20% of convenience expenditure and 75% of comparison expenditure happening outside of the OPDC area
P3	The policy should cross reference the level of floorspace identified in the Retail and Leisure Needs study as being appropriate for the centre	1	Brent Council	Change proposed. The floorspace provision requirements are set out in Policy TCC1.
P3	A more detailed study of character areas within the high street needs to be undertaken to consider: - Given the timescales for development and changing shopping behaviour, what is the	1	Brent Council	Change proposed. The character along the High Street will change and the differing character of parts of the High Street have been drawn out and identified in the places (P1, P2, P3, P7, P8 and P11). The RLNS has made projections for expenditure based on trends in internet shopping

	potential future role of the high street? - Grand Union Street and Grand Union Canal – will there be sufficient demand for these streets to comprise secondary frontage? - Is it realistic for active frontage to extend along the length of the canal or could this be interspersed with residential ground floor uses? - Should demand change, how will the Local Plan enable flexibility?			etc. and still shows a need for the order of floorspace identified in the Local Plan. However, the Local Plan does recognise the need for flexibility and the requirements for flexible units are outlined in the vibrancy policy (TCC2).
P3	Should acknowledge role that office uses can play as part of the High Street's offer	1	Brent Council	Noted. This is covered in the relevant place policies and Old Oak South place (P1) identifies the potential for the delivery of a new commercial hub in Old Oak South.
P3	Should promote Old Oak High Street being fully pedestrianised other than for out of hours servicing.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. The Local Plan supports the potential use of the High Street, where feasible, for buses and other vehicles.
P3	Support approach to land uses and streets in P3	6	Midland Terrace Resident's Group, Old Oak Interim forum, 6 residents	Noted. These are now incorporated into Policy SP6 (Places and Destinations), SP7 (Connecting People and Places) and places policies P1, P2, P3, P7, P8 and P11
P3	High densities proposed would create a canyon effect along Old Oak High Street. Approach to densities here is not supported and precedent of Tottenham Court Road is not appropriate.	4	Midland Terrace Resident's Group, Old Oak Interim Forum, 2 residents	No change proposed. Policy SP7 requires that development proposals for the High Street optimise the levels of daylight and sunlight that the street receives and minimises other environmental impacts such as wind and urban heat island effect. Policies SP3 (improving health and reducing health inequalities), D6 (amenity), EU4 (air quality) and EU9 (minimising carbon emissions and overheating).

P3	Requiring development to provide exemplary architecture that marks key destinations may lead developers to breach Policy 7.7 of the London Plan	2	Midland Terrace Resident's Group, Old Oak Interim forum	No change proposed. The Old Oak and Park Royal areas are identified as Opportunity Areas and are considered appropriate for tall buildings (7.7Ca), subject to detailed design considerations.
P3	Support approach set out in point P3e.	6	Midland Terrace Resident's Group, Hammersmith and Fulham Historic Buildings Group, 4 residents	Noted.
P3	Concerned that Old Oak High Street is too long and will not generate enough footfall to make the proposed town centre viable	2	Old Oak Interim Forum, 1 resident	No change proposed. The Public Realm, Walking and Cycling Strategy has assessed the anticipated footfall of the High Street and this work shows that the Street will generate a high footfall and is appropriate for town centre uses. The Retail and Leisure Needs Study has assessed the retail needs of the resident and worker population and this shows an A-class need during the plan period for 57,250sqm. D class floorspace would be additional to this. The Retail and Leisure Needs Study has assessed the length of the High Street and proposed level of active frontages in the indicative masterplan and concludes that the High Street would be a viable town centre.
P3	Should design the high street to have limited access for vehicles other than for buses	1	Old Oak Interim Forum	Noted. The Local Plan identifies that the High Street should be designed, where feasible, for buses and other vehicles.

P3	Not clear why the Old Oak Common station section of the High Street should be very 'distinct' from the rest	2	Old Oak Interim Forum, Midland Terrace Resident's Group	No change proposed. The area around Old Oak Common station will need to meet the needs of people interchanging in Old Oak Common station and meet the needs of the commercial hub around the station, meaning it will have a distinctive character.
P3	Support Policy P3	1	Old Oak Park (DP9)	Noted.
P3	Should recognise changing levels along the High Street as a development constraint that will need to be overcome	2	Old Oak Park (DP9), 1 resident	Change proposed. The supporting text to Policy SP7 recognises the changing levels along the high Street to overcome significant barriers created by topography and infrastructure.
P3	Should identify a fourth character area to the High Street around Willesden Junction station, recognising that it will also become a gateway to the area	1	Old Oak Park (DP9)	Change proposed. Willesden Junction is now identified as a separate place (P11) and which addresses the elements of unique character that development in this place should delivery/contribute to.
P3	Figure 32 should be titled illustrative masterplan	1	Old Oak Park (DP9)	Change proposed. The Local Plan appendix identifies that maps in the document are indicative.
P3	Should design the high street to have access for private cars to alleviate traffic on Old Oak Lane	1	TITRA	Change proposed. Policy SP7 states the High Street should be designed, where feasible, for buses and other vehicles.
P3	Do not support high densities along the High Street as this could result in a soulless place, like Chiswick Park in Gunnersbury	1	TITRA	Change proposed. Policy SP7 requires the High Street to be designed to a high quality with green infrastructure, mature tree planting and optimises the levels of daylight and sunlight that the street receives and minimises other environmental impacts such as wind and urban heat island effect,

				to ensure the proposed densities deliver a high quality place. Chiswick Park is not a High Street; it is a business park with limited retail provision.
P3	In figure 32 there is a road shown that presumably passes underneath the High-Level Willesden Junction tracks, immediately north of their North London Line - West London Line junction. That road cannot feasibly join Old Oak High Street, as shown, but would surely have to pass underneath it as well.	1	Resident	Change proposed. The images supporting the Local Plan have been revised for the Reg 19 draft. The road is now not shown as connecting to the High Street.
P3	the local Plan should set a minimum quantum of retail for Old Oak Common station	1	1 Resident	No change proposed. The figure is identified in the Retail and Leisure Needs Study, but it is an indicative figure. The figure has instead been included in the overall figures in the table accompanying policy TCC3.
P3	Should have a covered travellator along the High Street connecting Willesden Junction to Old Oak Common station	1	1 Resident	No change proposed. A covered travellator would not be appropriate along the high Street as it would not appropriately integrate with the public realm and support placemaking, or contribute to the high street's character.
P3	Should rename Old Oak High Street 'Old Oak Walk'	1	1 Resident	No change proposed. OPDC proposes to remain naming it Old Oak High Street to signify it being a new high street and major town centre.
P3	Should not have a high street and retail should be interspersed with residential units	2	2 Residents	No change proposed. This approach would be contrary to national policy, which seeks to cluster town centre uses in areas with greatest public transport accessibility and designate town centres

P3	Support requirements for culture as part of Old Oak High Street's offer	1	1 Resident	Noted.
P3	Should identify appropriate locations for a supermarket	1	1 Resident	Noted.
P3	Vision for Old Oak High Street should be clearer what the street will be like	1	1 Resident	Change proposed. Policy SP7 includes a clearer set of policy requirements for the High Street, informed by work in the Retail and Leisure Needs Study, Public Realm, Walking and Cycling Strategy and Environmental Standards Study.
P3	Should not design the High Street to have four lane roads	1	1 Resident	No change proposed. This is a detailed design consideration but it is unlikely that the street would be designed for four lanes and the Public Realm, Walking and Cycling Strategy is assuming the street would be two lanes.
P3	The Old Oak High Street town centre should be extended into Harlesden	1	1 Resident	No change proposed. Harlesden is outside of the OPDC boundary so this would be a consideration for Brent council. Within the OPDC area, the town centre boundary runs up to the edge of the OPDC area.
P3	The quality of design for the part of the High Street bridging the Grand Union Canal will be critical	1	Hammersmith and Fulham Historic Buildings Group	Noted. Policy SP7 requires that the High Street seamlessly connects the Hythe Road and Old Oak Common stations and that the street has a continuous high quality public realm.
P3	Need to ensure that the High Street is a green street with appropriate planting	1	Hammersmith and Fulham Historic Buildings Group	Change proposed. Policy SP7 requires that the High Street embeds a range of high quality green infrastructure, including mature tree planting and where feasible, waterspaces that are integrated into wider green infrastructure networks

P4	Need to be more specific about the requirements for open spaces	1	LB Brent	Change proposed. Policy P3 requires proposals to contribute to the delivery of a Local Park along the canal and a range of smaller connected canalside open spaces.
P4	Explore additional e-w routes to relieve pressure on tow path	1	LB Brent	Noted. Policies SP7, P1 and P2 set out the proposed movement network for the area and how these integrate with surrounding streets for a range of transport modes.
P4	Need to identify that canal will be enhanced as a biodiversity corridor	1	LB Brent	Change proposed. Policy P3 requires proposals to protect and enhance the biodiversity value of the canal as a Site of Importance for Nature Conservation in accordance with policy EU2.
P4	Explore the potential to use the canal for heating and cooling	3	Canal & River Trust, The Hammersmith Society, local resident	Change proposed. Policy P3 identifies the potential for the canal to be utilised for decentralised heating and cooling for Old Oak North and South.
P4	Broad support	3	Canal & River Trust, LB Ealing, Old Oak Park	Noted.
P4	Clarify that Canal & River Trust own and manage all of the Grand Union Canal and its towpath in para 4.60	1	Canal & River Trust	Change proposed. This information is set out in the supporting text to policy P3.
P4	Support for residential and visitor moorings alongside need to deliver supporting infrastructure	14	Canal & River Trust, National Bargee Travellers Association, The Hammersmith Society, TITRA,	Change proposed. Policy P3 supports a range of permanent and temporary new residential, leisure and visitor moorings and their supporting infrastructure.

			Local residents, local community representatives, Hammersmith and Fulham Historic Buildings Group	
P4	Expand reference to commercial (e.g. affordable workspaces and artists) and long term moorings including educational and festival opportunities	7	Canal & River Trust, Diocese of London, local residents	Change proposed. Policy P3 now makes reference to commercial and permanent moorings. Supporting text refers to educational and cultural mooring uses.
P4	Define potential for new basins or additional waterspace for moorings north of the canal	9	Canal & River Trust, The Hammersmith Society, The Inland Waterways Association, Local residents, Hammersmith and Fulham Historic Buildings Group	Change proposed. Policy P3 supports the delivery of multifunctional new basins and waterspaces.
P4	Support for towpath as Quietway	1	Canal & River Trust	Noted.
P4	Acknowledge that the towpath is an important part of the canal infrastructure	1	Canal & River Trust	Change proposed. Supporting text to P3 acknowledges the tow path as important part of the canal infrastructure.

P4	Do not generally support off-side walkways, but can see that it would be beneficial here	1	Canal & River Trust	Noted. Policy P3 requires proposals to contribute to the delivery of a continuous walking and cycling route along the north of the canal within Old Oak North.
P4	Provide more detail of towpath lighting	1	Canal & River Trust	No change proposed. Detailed guidance for lighting is considered to be beyond the scope of the Local Plan.
P4	Lighting should be provided	3	Local community representative, local resident	Change proposed. Support for appropriate lighting is provided in policy P3.
P4	Define current surface water flooding issues experienced along the canal's length as this is currently not known to be an issue	1	Canal & River Trust	Change proposed. This information is set out in the supporting text to policy P3.
P4	Definition of smaller neighbourhoods to be discussed with OPDC	1	Canal & River Trust	Noted. Policies P1 and P2 set out the aspiration to deliver a network of new neighbourhoods. They do not define the neighbourhoods. This reflects the delivery timeframes.
P4	Need to consider microclimate impacts of overshadowing on the canal	1	Canal & River Trust	Noted. Policy D6 provides guidance for protecting amenity of spaces. Policy P3 and EU1 provides guidance for protecting and enhancing the biodiversity value of the canal.
P4	Include a wider photo than figure 37	1	Canal & River Trust	Change proposed. This figure has been removed from the Local Plan.

P4	Community uses should be included as suitable town centre use	1	Diocese of London	Noted. The glossary defines social infrastructure as a town centre use.
P4	The canal can be made into a major and well used feature in the Old Oak/Park Royal area.	5	Grand Union Alliance, local community representatives, local business, Hammersmith and Fulham Historic Buildings Group	Noted. Policy P3 seeks to deliver this aspiration.
P4	Provide canal development precedents	1	Historic England	Change proposed. OPDC's Precedent Study (2017) provides canalside precedents. This information has informed the development of policy P3.
P4	Concerns regarding the intention to 'transform' the canal in light of it being a Conservation Area.	1	Historic England	Change proposed. Reference to 'transform' has been removed.
P4	Vision does not align with policy wording in light of it being a Conservation Area. Suggested wording: ‘The character and appearance of the Grand Union Canal Conservation Area will be explored through a conservation area appraisal. This will seek to ensure that proposals preserve and enhance its character and appearance.’	1	Historic England	Change proposed. The vision has been amended to better reflect the existing and future conservation areas along the length of the Grand Union Canal.

P4	Tall building locations - policy needs to be informed by more detailed evidence base. Setting of heritage assets is key.	1	Historic England	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
P4	Illustration - p73 does not suggest good canalside design in terms of urban grain and character	1	Historic England	Change proposed. This figure has been removed from the Local Plan.
P4	Relationship of public realm and edges to canal is critical.	1	Historic England	Noted. Policy P3 provides guidance reflecting this.
P4	Consider using design codes for features along the canal including bridges and lighting	1	Historic England	Noted. Policy P3 provides guidance for lighting and bridges appropriate to the role of a Local Plan.
P4	Should implement Conservation Areas along its entire length.	2	LB Ealing, Local resident	Noted. OPDC's Heritage Strategy proposes the delivery of a single conservation area along the length of the Grand Union Canal. This will be progressed in 2018.
P4	Need development in Old Oak to achieve a coherent urban scale.	1	LB Ealing	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal.

P4	Need to improve environmental quality of the canal	5	LB Ealing, TITRA, local community representative, local residents	Change proposed. Policies EU2, EU3 and P3 seek to enhance the environmental quality and roles of the Grand Union Canal.
P4	Support for walking and cycling route along the north and south of the canal	5	Midland Terrace Residents Group, Old Oak Interim Forum, The Hammersmith Society, TITRA, Local resident	Noted.
P4	Concerns regarding impact of high densities along the canal	2	Midland Terrace Residents Group, Old Oak Interim Forum, TITRA	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting amenity and local legibility to enable people to reach destinations along the canal.
P4	Proposed density is higher than cited examples.	1	Midland Terrace Residents Group	Noted. OPDC has undertaken a Grand Union Canal Massing and Enclosure Statement to inform the appropriate approach to densities and building heights along the canal.
P4	The overall approach set out for the preferred policy option is broadly supported. Sub-paragraph f) could be used as justification for additional building height.	1	Midland Terrace Residents Group	Change proposed. OPDC's Precedent Study (2017) provides canalside precedents. This information has informed the development of policy P3.
P4	A series of small-scale neighbourhoods could be identified, including Atlas Road and Mitre Bridge hubs.	10	Midland Terrace Residents Group, Old Oak Interim Forum, The Inland	Change proposed. Policies P8C1 and P10C4 provide guidance for the delivery of clusters at these locations.

			Waterways Association, TITRA, Local residents, local community representative	
P4	Higher densities than those proposed could be delivered	3	Local residents	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
P4	Higher densities than those proposed should not be delivered	4	Midland Terrace Residents Group, Old Oak Interim Forum, The Inland Waterways Association, local resident, Hammersmith and Fulham Historic Buildings Group	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
P4	Wish to be considered as key stakeholders	1	National Bargee Travellers Association	Noted.

P4	Suggest that existing character definition includes boaters without a home mooring	1	National Bargee Travellers Association	Change proposed. The Local Plan glossary has been updated.
P4	Boaters should be referenced in the place vision.	1	National Bargee Travellers Association	Change proposed. The vision has been amended to refer to existing moorings.
P4	Amend policy to include: a. Support the delivery of land uses which are related to the canal and canal users such as wharfs, boatyards, workshops, chandleries and related facilities.	1	National Bargee Travellers Association	Change proposed. Policy P3 now supports canal related land uses.
P4	Amend policy to include: b. Contribute to the retention and improvement of the towpath for casual moorings recognising that this can enhance security in the area.	1	National Bargee Travellers Association	Change proposed. Policy P3 supports a range of permanent and temporary new residential, leisure and visitor moorings and their supporting infrastructure.
P4	Amend policy to include: c. Consider the views of canal users, including boater groups and conservation groups, and to work to address their concerns.	1	National Bargee Travellers Association	Change proposed. Supporting text to P3 now refers to boating associations and canal users as stakeholders to inform the delivery of the vision.
P4	Suggest that the phrase ‘casual moorings’ would be more inclusive than ‘visitor moorings’ as it would more clearly apply to all canal users.	1	National Bargee Travellers Association	Change proposed. Casual moorings are referred to in supporting text to P3.

P4	Define how moorings would adversely impact on the regeneration of the wider area	1	National Bargee Travellers Association	Change proposed. Relevant wording has been removed from the Local Plan.
P4	Suggest policy is amended as: "New development will be required to support the delivery of residential and casual moorings and related facilities in locations that do not impact on the navigational function of the canal".	1	National Bargee Travellers Association	Change proposed. Relevant wording has been removed from the Local Plan.
P4	Refer to 'local boater groups'	1	National Bargee Travellers Association	Change proposed. Supporting text to P3 now refers to boating associations and canal users as stakeholders to inform the delivery of the vision.
P4	Character of the canal is likely to be lost with neighbouring development	3	Old Oak Interim Forum, TITRA, local community representative	No change proposed. Policy P3 seeks to strengthen the local identity and character of the canal.
P4	Consistent approach to public realm design required	1	Old Oak Interim Forum	Noted. Policy D2 requires the delivery of the public realm to be coordinated.
P4	Cited precedents reliant on industrial heritage buildings	1	Old Oak Interim Forum	Change proposed. OPDC's Precedent Study (2017) provides canalside precedents. This information has informed the development of policy P3.
P4	Concerns regarding relative density ranges	1	Old Oak Interim Forum	Change proposed. SP9 identifies the canal as a sensitive location, requiring proposals to respond accordingly in terms of heights and densities. Policy P3 requires proposals to delivery generally 6-8 storeys on to the canal with opportunities for

				taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
P4	Concerns regarding definition of 'moment of interest'	1	Old Oak Interim Forum	Change proposed. SP9 identifies the canal as a sensitive location, requiring proposals to respond accordingly in terms of heights and densities. Policy P3 requires proposals to delivery generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
P4	Use of the canal for passenger and private transport should be a policy theme.	3	TfL, local community representative, local resident, Hammersmith and Fulham Historic Buildings Group	Change proposed. Canal based transport guidance is provide in policy P3.
P4	CRT permission is required for any new bridges. Support CRT response.	1	The Hammersmith Society	Noted. Policy P3 refers to the need for close working with the Canal and River Trust.
P4	Canal is not identified as Open Space or walking route.	1	The Hammersmith Society	Change proposed.

P4	There is a potential conflict of walking and cycling alongside canal which could be resolved.	3	The Hammersmith Society, Local resident, local community representative	Change proposed. Policy P3 requires proposals to contribute to the delivery of a Local Park along the canal and a range of smaller connected canalside open spaces. It also refers to new and improved canalside walking and cycling routes.
P4	Canal can provide a waterside green corridor, with leisure and sporting activities and an attractive environment for new homes to be built near the canal.	1	The Hammersmith Society	Noted. These aspirations are embedded within the vision for the canal.
P4	Historic buildings should be retained and reused.	3	The Hammersmith Society, TITRA, Local resident	Change proposed. Policy P3 seeks to converse and enhance the conservation area and locally listed buildings as well as ensuring the use of a high quality palette of materials to enhance the historic character.
P4	Vision for canal in Park Royal lacks ambition	1	The Inland Waterways Association	Change proposed. Vision has been amended.
P4	Figure does not accord with policy aspirations	1	The Inland Waterways Association	Change proposed. This figure has been removed from the Local Plan.
P4	More clarity on building heights required	1	TITRA	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.

P4	Birchwood nature reserve should be retained	1	Local resident	Noted. Policy P1 seeks to enhance Birchwood Nature Reserve if retained in its current location, or reprovided in accordance with policies EU1 and EU2.
P4	Meanwhile uses should be supported	1	Local resident	Change proposed. Policy P3 supports meanwhile uses along the canal.
P4	Towpath on southern side	1	Local community representative	Noted
P4	Utilities under tow path	1	Local resident	Noted.
P4	Concerns regarding land ownerships complicating improvements and that OPDC could purchase land alongside the canal	2	Local community representative, local resident	Noted. Policy P3 refers to the need for close working with the Canal and River Trust.
P4	Positive role of The Collective on the canal	1	Local community representative	Noted.
P4	Mitre Tavern should be rebuilt	1	Local community representative	Noted. Policy P10C4 seeks to deliver canalside leisure uses within the Mitre Canalside cluster.

P4	Tow path width should be increased and / or buildings set back from the canal	5	Local residents	Noted. Policy P3 provides guidance for delivering a shared walking and cycling route along the towpath of 3.5 metres where feasible. There may be locations on the north of the canal where buildings delivered directly on to the canal are appropriate to reflect the historic canalside character.
P4	Access routes should be provided a regular intervals	2	LB Brent, local resident	Change proposed. Policy P3 sets out the locations of new and improved connections along the canal.
P4	Car parking for the canal should be provided	1	Local community representative	No change proposed. This would not accord with the proposed car parking standards set out in policy T4.
P4	Car parking for the canal should not be provided	1	Local resident	Noted.
P4	Cycle parking on the canal will provide safety issues	1	LB Brent	Noted. Policy P3 provides guidance for delivering a shared walking and cycling route along the towpath of 3.5 metres where feasible to support walking and cycling.
P4	Connections from the canal to Wormwood Scrubs	1	Local community representative	Noted. A number of new sensitive walking and cycling connections to Wormwood Scrubs are proposed in policy P12 and P1.
P4	Segregated cycle lanes should be explored	2	Local community representative, local resident	Noted. Policy P3 provides guidance for delivering a shared walking and cycling route reflecting the role and constraints of the towpath.

P4	Support for tow path as a walking and cycling route	3	Local residents	Noted. Policy P3 provides guidance for delivering a shared walking and cycling route along the towpath of 3.5 metres where feasible to support walking and cycling.
P4	More open spaces should be provided along the canal	3	Local residents	Change proposed. Policy P3 requires proposals to contribute to the delivery of a Local Park along the canal and a range of smaller connected canalside open spaces.
P4	Objection to identifying smaller areas	1	Local resident	Noted.
P4	Support for a stadium use	3	Local residents	Noted. Policies SP6 and TCC8 provide guidance for the location and type of catalyst uses across the OPDC area.
P4	Varied styles of buildings should be provided	1	Hammersmith and Fulham Historic Buildings Group	Noted. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
P4	The Canal and River Trust should be involved in pre-application discussions on schemes that would result in an impact on the Grand Union Canal	1	Canal and River Trust	Noted. Policy P3 refers to the need for close working with the Canal and River Trust. This includes in pre-application discussions.

P4	Need to provide space for residential canal moorings	2	2 Residents	Noted. Policy P3 supports residential moorings
P4	Support measures for the protection and enhancement of biodiversity along the canal, where this does not obstruct navigation	1	Canal and River Trust	Change proposed. Policy P3 seeks to protect and enhance the biodiversity value of the canal in accordance with policy EU2.
P4	The canal warrants particular attention in EU8 and P4 and to cover biodiversity, access, building heights, bridges and cycling and pedestrian routes on the canal tow path, basins, side docks and wharfs.	1	Grand Union Alliance	Noted. Policy P3 provides guidance for these elements.
P4	Some wild areas should be maintained along the canal	1	Resident	Noted. This level of detail is beyond the scope of the Local Plan. However, policy P3 seeks to enhance the environmental quality and role of the canal.
P4	Should support canalside restaurants and artists' markets	1	Midland Terrace Resident's Group, Old Oak Interim Forum	Change proposed. Policy P3 supports town centre uses, including markets and leisure uses, along the canal.
P4	Boating and canoeing should be introduced on the Grand Union Canal	1	The Hammersmith Society	Change proposed. Policy P3 supports canal related uses on the canal.
P4	Should provide facilities for canal users	1	Hammersmith and Fulham Historic Buildings Group	Noted. Policy P3 supports the delivery of canal related infrastructure.

P8	Support the retention of the open space between the railways to the south of Wells House Road	1	Hammersmith and Fulham Historic Buildings Group	Noted. This space is required to support the delivery of Old Oak Common Station. OPDC will work with HS2 Limited to explore its long term use.
P4	There are a number of Victorian industrial buildings along the northern edge of the canal in Old Oak North that merit protection	4	Canal and River Trust, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Noted. This information will be used to inform the proposed local list. The local list will be consulted on and adopted alongside the progression of the Local Plan.
P4	There is currently a conflict between pedestrians and cyclists on the towpath in Old Oak and this needs to be resolved	1	Resident	Noted. Policy P3 provides guidance for delivering a shared walking and cycling route along the towpath of 3.5 metres where feasible to support walking and cycling.
P4	Policy should require that buildings do not cast a shadow on the canal	1	1 Resident	No change proposed. The Local Plan requires development to contribute to a variety of building heights that respond to the canal's heritage, character, biodiversity and amenity function by delivering heights and massing that support the functioning, designations, amenity and character of the canal. However, it does not set a firm rule that no shadow can be cast on the canal. This is not consistent with the general character of the canal.
Places, P5	Identifying Park Royal as one Place ignores the spatial variations in character (size of units and uses). Local Plan should use a more fine grained approach and identify distinct, smaller places and/or in appropriate policies (including on open workspace).	1	London Borough of Brent, London Borough of Ealing	Change proposed. Changes have been made to the Local Plan to identify an additional place (Old Park Royal) meaning that there are now 3 Places covering Park Royal. Further work has been undertaken to expand on the evidence base, including the completion of the Future Employment Growth Sectors Study, Heritage Strategy and Character Areas Study. This has helped to refine the place boundaries and informed the

				identification of Old Park Royal. The employment chapter includes policies (E2 and E3) on overarching considerations such as the mix of unit sizes and the need for low cost workspaces.
Places, P5	Seeking clarification on the description of the former Twyford Tip.	1	London Borough of Brent	Noted. The Place policies and supporting text have been updated.
Places, P5	Question whether OPDC is proposing changes to the Park Royal neighbourhood centre to include Central Middlesex hospital.	1	London Borough of Brent	Noted. The Local Plan includes the boundary for Park Royal neighbourhood centre. This boundary includes the Central Middlesex Hospital site as it provides a key function within the town centre.
Places, P5	Need to consider open/green space needs in Park Royal	2	London Borough of Brent, workshop	Noted. The Environmental Standards Study has examined what level/standard of green infrastructure may be appropriate across Old Oak and Park Royal. The approach has taken into account the fact that the Park Royal is an industrial estate and the need to support the continued successful operation of businesses in the area. The findings from the Study identify a number of opportunities to embed green infrastructure including rooftop farming, green roofs/walls and as part of the public realm.
Places, P5	Development should seek to improve connections between residential areas, tube stations and key facilities with a suggestion to provide improved mixed use streets which provide activity and sense of security.	1	London Borough of Brent	Noted. The Park Royal place policies refer to improvements along the primary routes that run through Park Royal and connect up the stations and the residential areas and meet at the neighbourhood centre. These improvements include enhancing the public realm, walking and cycling routes, lighting and wayfinding. Additional development is being promoted at Park Royal Centre, First Central and Atlas Junction to

				increase the range of services available for local communities in the area.
Places, P5	The retail/ leisure park at Park Royal could be redeveloped and improved with new facilities to create a quality place.	1	London Borough of Brent	Noted. The Park Royal West place (Policy P4) focuses on protecting industrial land and uses, unless a specific need has been identified for alternative uses. The rationale for protecting industrial land is set out in the Industrial Land Review.
Places, P5	Need to consider amenity impacts of employment uses	2	London Borough of Brent, workshop	Noted. The Park Royal place and Employment policies will ensure that appropriate mitigation is in place so that there are no significant adverse impacts to the functioning of the SIL area and to amenity.
Places, P5	Need to increase permeability across rail lines between Park Royal and the north and surrounding areas	2	London Borough of Brent, workshop	Noted. The Park Royal Transport Strategy and the separate Public Realm, Walking and Cycling Strategy identify the opportunities to improve the quality and function of the movement network so that there are good connections for all users/modes across the area. There are significant constraints to increasing permeability and creating new connections around Park Royal due to the barriers created by the railway lines. Therefore, the Park Royal places policies also seek to improve existing links to/from and over these infrastructure barriers.
Places, P5	The key on Figure 39 includes public civic spaces, but these spaces are not highlighted on the figure.	1	London Borough of Brent	Noted. All figures have been updated in the Local Plan.

Places, P5	Need to identify locations/smaller scale places for small and micro businesses	1	London Borough of Brent	Noted. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units. Small workspaces are taken up by a wide variety of employment sectors which could be compatible with a variety of other uses and, therefore, could be suitable in a number of locations. The Plan does not restrict where they can be located to allow for an appropriate level of flexibility.
Places, P5	Support SIL boundary changes if buffer around residential uses provided	1	London Borough of Brent	Noted. Local Plan policies will require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses.
Places, P5	Need to improve pavements in Park Royal so they can help meet inclusive mobility standards and tree planting.	1	London Borough of Brent	Noted. All of the Park Royal Place policies refer to the need for proposals to support improvements to the transport network and the public realm for all users. Additional information/ requirements for this are provided in the Design chapter.
Places, P5	Need public realm enhancements around Harlesden and Stonebridge Park stations	1	London Borough of Brent	Noted. The Park Royal West place policy (P4) refers to the need for proposals to support improvements to the public realm on routes to/from stations.
Places, P5, Figure 39	Lakeside Drive is incorrectly plotted.	2	Diageo Plc, SEGRO	Change proposed. All figures have been updated in the Local Plan.
Places, P5	Improvements to transport and infrastructure in Park Royal are welcomed	1	Diageo Plc	Noted.

Places, P5	Sites in Park Royal with development capacity and where infrastructure improvements are needed should also be considered in Development Capacity Study	1	Diageo Plc	Noted. Future development on non SIL sites is taken in account in the Development Capacity Study. The Place policies and IDP identify infrastructure requirements needed to support development. The intensification of Park Royal to increase the number of jobs is also considered in a separate study.
Places, P5	Diageo would like to be kept updated on future consultations.	1	Diageo Plc	Noted.
Places, P5	Difficult to set policy for Park Royal in advance of new London Plan due to potentially conflicting priorities for SIL.	1	London Borough of Ealing	Noted.
Places, P5	OPDC should support call for GLA to undertake a full review of the role of logistics functions in London	1	London Borough of Ealing	Noted. OPDC works closely with the GLA in order to understand how the Local Plan can support the objectives in the London Plan. OPDC has developed its evidence base including the Industrial Land Review and Future Employment Growth Sectors Study to assess the potential demand for certain uses, and we understand the role that logistics does and can continue to play in OPDC's area. This evidence base is shared with all partners, including the GLA but ultimately the GLA are responsible for identifying and planning for strategic matters for London, and matters related to the review of the London Plan should be directed to them in the first instance.
Places, P5	Need to provide environmental enhancements and to promote active uses on main routes	1	London Borough of Ealing	Change proposed. The Environmental Standards Study has examined what targets may be appropriate across Old Oak and Park Royal. The approach has taken into account the fact that the Park Royal is an industrial estate and the need to

				support the continued successful operation of businesses in the area. The findings from the Study identify a number of opportunities such as embedding more green infrastructure and reducing the heat island effect. The Park Royal place policies focus improvements on the four primary routes that run through Park Royal and connect up the stations and the residential areas and meet at the neighbourhood centre. These improvements include enhancing the public realm, walking and cycling routes, lighting and wayfinding. Also, additional development is being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in the area.
Places, P5	Intensifying Park Royal would result in rising rental values	1	London Borough of Ealing	No change proposed. The rent levels across Park Royal are already increasing and given the loss of industrial land across London, this situation may continue in the short to medium term. The point of intensification is to increase the number of jobs and employment densities across Park Royal. A number of strategies could be taken forward to achieve this including horizontal/vertical extensions, infill or comprehensive development. Intensification could therefore help increasing the amount of floorspace/development possible on individual sites, and improve the balance between supply and demand in this location. Importantly, policies in the Employment chapter (E1, E2, E3) seek to safeguard industrial land, provide a mix of small units and/or low cost workspace which should help ensure industrial rent will apply to this area and greater affordability for smaller and start-up businesses.

Places, P5	Need to be clear that change will be incremental and organic.	1	London Borough of Ealing	Noted.
Places, P5	Need to include more detail about existing spatial context for Park Royal.	1	London Borough of Ealing	Change proposed. Further work has been undertaken to expand on the evidence base, including the completion of the Heritage Strategy and Character Areas Study. This has helped to refine the place boundaries and informed the understanding of their spatial context and the details included in the Park Royal place policies.
Places, P5	Support the continued role of Park Royal as a successful employment area, but question whether approach to SIL is over-simplistic/blunt/not flexible enough given the varied nature of existing uses and over the longer timeframe.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is reflected within the Local Plan's strategic policies.
Places, P5	Recognise the need to protect 'industrial land' in London. However, there is potential for new, innovative typologies to emerge that test higher densities, sharing facilities, or different mixes of use.	1	Midland Terrace Resident's Group	Noted. OPDC has been exploring opportunities increase the number of jobs and employment densities across Park Royal. The Intensification Study identifies a number of strategies that could be taken forward to achieve this including horizontal/vertical extensions, infill or comprehensive development. The Study has also developed typologies which are relevant to the Park Royal context. Taking a more blurred

				approach and mixing non industrial land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is already reflected within the Local Plan's strategic policies.
Places, P5	The 'residential pockets' remain isolated within 'strategic industrial land' area. They should be better /connected	4	Midland Terrace Resident's Group, Old Oak Interim Forum, workshop, workshop	Noted. The Park Royal place policies refer to improvements along the primary routes that run through Park Royal and connect up the stations and the residential areas and meet at the neighbourhood centre. These improvements include enhancing the public realm, walking and cycling routes, lighting and wayfinding. Additional development is being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in the area.
Places, P5	Restrictive 'zoning' policy has not improved the local environment or quality of life. Park Royal is deficient in community infrastructure.	1	Midland Terrace Resident's Group	No change proposed. Park Royal will continue to be protected as a Strategic Industrial Location (SIL) to support broad industrial and related activities. OPDC has identified the range of infrastructure required to be provided within development area to meet the needs of the new population. The Local Plan specifies what infrastructure is needed, when, where and who and how it will be provided. Additional development is being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in the area.

Places, P5	There is the potential for mixed use areas to link up existing residential areas and a new proposed Place.	1	Midland Terrace Resident's Group	Change proposed. A new Place has been identified called Old Oak Lane and Old Oak Common Lane. This sets out clear guideline on the appropriate mix of uses, including industrial/employment uses, in this location. The approach takes into account that this is a transition point between Old Oak and Park Royal and how to protect SIL and support the existing residential communities in this area, including Midland Terrace. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Policies will require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses.
Places, P5	No clear justification for extending the existing SIL area. More bespoke policies could be developed to protect vital uses.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. The Industrial Land Review sets out the rationale for continuing to protect and extend the Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role.

Places, P5	The new homes target for the Park Royal Place could be increased, though policies that allow for mixed use.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. These targets have been updated in the Plan and are based on an understanding of the development potential of each site. These targets take into account the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Land (SIL) boundary. Residential development is only being promoted on non-SIL sites including those in Park Royal Centre and around First Central and Brewery cluster. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is reflected within the Local Plan's strategic policies.
Places, P5	Support for mixed use approach in certain areas (suggestions include around Wesley Estate, HS2 works site north and south of the canal, and the Atlas roundabout area and a proposed new Place).	2	Old Oak Interim Forum, workshop	Noted. A new Place has been identified called Old Oak Lane and Old Oak Common Lane. This sets out clear guideline on the appropriate mix of uses, including industrial/employment uses, in this location. The approach takes into account that this is a transition point between Old Oak and Park Royal and how to protect SIL and support the existing residential communities in this area, including Midland Terrace. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL

				and the area's London-wide role. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Policies will require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses.
Places, P5	Welcome the ongoing support for industrial uses within the Park Royal SIL	1	SEGRO	Noted.
Places, P5	Further consideration is required regarding intensification of industrial uses.	1	SEGRO	Change proposed. OPDC has been exploring opportunities increase the number of jobs and employment densities across Park Royal. The Intensification Study identifies a number of strategies that could be taken forward to achieve this including horizontal/vertical extensions, infill or comprehensive development. The Study has also developed typologies which are relevant to the Park Royal context. This evidence base has been used to inform the Park Royal place policies and the Employment policies.
Places, P5	Original proposals for First Central did not provide all of the infrastructure promised.	1	West Twyford Residents' Association	Noted. The Local Plan is promoting additional development on the First Central site and provides clear guidance on what is expected in terms of infrastructure in this location.

Places, P5	Improvements to Park Royal's infrastructure will be particularly complicated because of its existing context and ownership patterns. It is not clear how/where modes of transport will be accommodated to support jobs growth. Improving the street scenes will not improve the situation as footpaths and kerbs are used as part of the existing business operations.	1	West Twyford Residents' Association	Noted. The Park Royal Transport Strategy and the separate Public Realm, Walking and Cycling Strategy identify the opportunities to improve the quality and function of the transport network for all users/modes. In line with the Park Royal place policies and Transport policies, development proposals will be expected to contribute towards or deliver these improvements and demonstrate adequate access and servicing arrangements.
Places, P5	Suggestion for Acton Lane National Grid frontage improvements	1	Local resident	Noted. The Park Royal place policies refer to improvements along the primary routes that run through Park Royal; this includes Acton Lane. These improvements include enhancing the public realm, walking and cycling routes, lighting and wayfinding.
Places, P5	Park Royal should be kept as one Place	1	Local resident	Noted. The Park Royal Atlas and Industrial Land Review provide baseline information and insight into the characteristics of Park Royal. Further work has been undertaken to expand on the evidence base, including the Character Areas Study, Heritage Strategy and Future Employment Growth Sectors Study. This body of work has helped to refine the place boundaries. Having a single boundary would ignore the spatial variations and priorities across Park Royal. OPDC have therefore amended the boundaries to identify 3 places covering Park Royal: Park Royal West, Park Royal Centre and Old Park Royal.
Places, P5	Park Royal's industrial function should be protected.	1	Local resident	Noted. The Local Plan policies support the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Location boundary.

Places, P5	There is an opportunity to make better use of and to redevelop McVitie's car park	1	Local resident	Noted. OPDC has been exploring opportunities increase the number of jobs and employment densities across Park Royal. The Intensification Study identifies a number of strategies that could be taken forward to achieve this including horizontal/vertical extensions, infill or comprehensive development. The Study has also developed typologies which are relevant to the Park Royal context. This evidence base has been used to inform the Park Royal place policies and the Employment policies.
Places, P5	The proposed intensification with some but limited non-industrial and housing use with access to Park Royal station, seems proportionate.	1	Local resident	Noted.
Places, P5	Residential uses should not be allowed in Park Royal	1	Local resident	Noted. The Local Plan policies support the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Location (SIL) boundary. Residential development is only being promoted on non-SIL sites including those in Park Royal Centre and around First Central and Brewery cluster.
Places, P5	Other existing interwar housing areas could be included in the area	1	Local resident	Noted. Existing residential streets are identified in the mapping of the area.
Places, P5	Extend Old Oak West, this could include Wesley Estate	1	Local resident	No change proposed. Channel Gate (formerly Old Oak West) was identified to include clear long term priorities for this land to mitigate impacts whilst it is used by HS2 and when it is no longer required as a HS2 work site. These circumstances do not

				apply to Wesley Estate and also the railway forms a key boundary for Channel Gate place.
Places, P5	Concern that new residents will not stay long or be integrated, feel/become part of the community (i.e. there is a shuttle bus to Willesden Junction, First Central)	1	workshop	Noted. The place policies include measures to support the integration of residential areas such as the phased delivery range of services to meet the needs of local communities in the area, increasing job opportunities so people can work and live nearby, enhancing open space provision, the public realm, and walking and cycling routes. These measures will contribute towards the delivery of sustainable neighbourhoods.
Places, P5	Want to promote vibrant uses (retail, cultural) and connect communities along Victoria Road	1	workshop	Change proposed. A new Place has been identified called Old Oak Lane and Old Oak Common Lane. This sets out clear guideline on the appropriate mix of uses, including industrial, employment, retail uses, in this location. The approach takes into account that this is a transition point between Old Oak and Park Royal and how to protect SIL and support the existing residential communities in this area. A new neighbourhood town centre is being promoted at Atlas Junction to increase the range of services available for local communities in the area.
Places, P5	Suggest Atlas Road roundabout should be a neighbourhood hub	1	workshop	Change proposed. Additional development is being promoted at Atlas Junction to increase the range of services available for local communities in the area. Atlas Junction is being proposed to be designated as a neighbourhood town centre.
Places, P5	Wesley Estate should be better integrated by connecting it to new open space, new mini high street	1	workshop	Noted. The Park Royal place policies refer to improvements along the primary routes that run through Park Royal and connect up the stations and the residential areas and meet at the

	and only allowing lower rise buildings.			neighbourhood centre. These improvements support the integration of residential areas such as Wesley Estate and First Central by enhancing the public realm, walking and cycling routes, lighting and wayfinding along these key routes. Also, additional development is being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in the area.
Places, P5	There are already new restaurants opening in Park Royal but there may not be enough	1	workshop	Noted. The Park Royal Centre place policy (P6) supports additional town centre uses and services in order to meet the needs of the business and residential community. Additional retail development is also being promoted at First Central and Atlas Junction to increase the range of services available for local communities in these areas.
Places, P5	There is the potential for a small marina in Park Royal	1	workshop	Noted.
Places, P5	Should not support transport intensive uses in Park Royal SIL due to existing problems with traffic congestion	1	workshop	No change proposed. The Industrial Land Review and the Future Employment Growth Sectors Study project ongoing demand for a range of industrial uses, some of which are more transport intensive than others such as transport and logistics operations. The Plan supports a range of sectors to respond to market demands and in order to ensure that Park Royal continues to have a diverse and resilient employment base. The Plan does acknowledge the high levels of traffic and congestion in Park Royal, and seeks to minimise this by supporting changes to travel behaviour and more sustainable practices

				(increasing/improving walking and cycling provision, ensuring access to public transport, promoting consolidation delivery and servicing arrangements between businesses or increasing efficiency by reducing 'empty running' of logistics vehicles).
Places, P5	Could split Park Royal Place into north and south	1	workshop	Change proposed. The Park Royal Atlas and Industrial Land Review provide baseline information and insight into the characteristics of Park Royal. Further work has been undertaken to expand on the evidence base, including the Character Areas Study, Heritage Strategy and Future Employment Growth Sectors Study. This body of work has helped to refine the place boundaries, which includes revisions to split Park Royal into: Old Park Royal, Park Royal West and Park Royal Centre.
Places, P5	More buildings needed which are better suited for commercial uses. Existing buildings could be reused for live/work/resi.	1	workshop	Noted. The Local Plan policies support the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Location (SIL) boundary. Residential development is only being promoted on non-SIL sites including those in Park Royal Centre and around First Central and Brewery cluster. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role.
Places, P5	Concerned about the impact and length of construction period, including the impacts on local businesses	1	workshop	Noted. The Transport policies will ensure appropriate mitigation is secured to manage potential adverse impacts related to construction.

Places, P5	Should be more flexible with the SIL designation to allow non-industrial, mixed use spaces	1	workshop	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is reflected within the Local Plan's strategic policies.
Places, P5	Support for maximising the use of industrial land and car parking areas	1	workshop	Noted.
Places, P5	CPZ near PRNC should be enforced.	1	workshop	Noted. Brent Council and Ealing Council are the local highway authorities with responsibilities for parking enforcement on public roads in this area. OPDC does not have the legal powers to do this. As this is the case, OPDC is limited to working closely with these boroughs to help develop approaches to managing car parking in Park Royal.
Places, P5	Concerns over safety, parking is free and having to walk at night is worrying	1	workshop	Noted. The Park Royal place and Transport policies are trying to encourage more people to walk and cycle to Park Royal. However, these policies acknowledges that a number of improvements needed to support this objective including enhancements to the public realm, more active frontages to increase surveillance, improving and creating new walking and cycling routes and better lighting and wayfinding.

Places, P5	Query whether hospital will stay and whether there will be sufficient health provision for the anticipated population in Park Royal area	2	workshop, commonplace	Noted. The Park Royal Centre place (P6) policy supports the retention of Central Middlesex hospital. The Education and Health Study assesses the need for new facilities in OPDC's area to ensure sufficient provision is being made. Requirements are set out in the Infrastructure Delivery Plan (IDP).
Places, P5	Need to look at access to Park Royal Station	1	workshop	Noted. The link between Park Royal station and Park Royal industrial estate is identified as needing improvement in the Park Royal West place policy (P4). Beyond this, the Park Royal place policies also focus improvements on other key routes including the four primary routes that run through Park Royal and connect up the stations and the residential areas and meet at the neighbourhood centre. These improvements include enhancing the public realm, walking and cycling routes, lighting and wayfinding.
Places, P5	Retail and services could be focussed in Park Royal Centre but also in other locations in Park Royal.	1	workshop	Noted. The Park Royal Centre place policy does support additional town centre uses and services in order to meet the needs of the business and residential community. Additional retail development is also being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in these areas. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.

Places, P5	Question whether or not new bridges and tunnels would improve connections across Park Royal.	1	workshop	Noted. The Park Royal Transport Strategy and the separate Public Realm, Walking and Cycling Strategy identify the opportunities to improve the quality and function of the transport network for all users/modes, including the need for new connections across the OPDC area. Park Royal West place policy identifies the opportunity for a new link between Park Royal and Old Oak.
Places, P5	Clarification required on whether or not roads are adopted	1	workshop	Noted. Brent Council and Ealing Council are the local highway authorities with responsibilities for adopted roads in this area. Information on adopted roads in Park Royal would be held by these authorities.
Places, P5	If ASDA shut for redevelopment residents could cope in the meantime	1	workshop	Noted.
Places, P5	Support for development of First Central site	1	workshop	Noted.
Places, P5	First Central lacks social infrastructure and should be connected. There may be opportunity for shops to be located here to cater for local workers.	2	workshop, commonplace	Change proposed. The Local Plan supports mixed use development at First Central. The mix of uses include new employment and retail uses. An increase the range of services is being promoted so that the meet the needs of new and existing residents can be met.
Places, P5	There is nothing for employees in Park Royal, to entice them in	1	workshop	Noted. The Park Royal Centre place policy supports additional town centre uses and services in order to meet the needs of the business and residential community. Additional retail development is also being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local

				communities in these areas. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.
Places, P5	Businesses in Park Royal do not provide facilities.	1	workshop	Noted.
Places, P5	Suggest softening the industrial area for residents and workers	1	workshop	Noted.
Places, P5	The environment around Coronation Road would not be attractive to potential employers.	1	workshop	Noted. The Park Royal West place policy aims positively address this by supporting a range of improvements to Coronation Road as well as other key routes. These improvements include enhancing the public realm, embedding more green infrastructure, improving/creating the walking and cycling routes and better lighting and wayfinding.
Places, P5	The areas of Park Royal north and south of A40 are very different from each other	1	workshop	No change proposed. Further work has been undertaken to expand on the evidence base, including the completion of the Heritage Strategy and Character Study. This has helped to refine the place boundaries.

Places, P5	The area of Park Royal south of A40 has bad connectivity and reputation. Suggestion that it could be redeveloped	1	workshop	Noted.
Places, P5	There needs to be a delivery strategy for improvements to Park Royal, including how these would be funded.	1	workshop	No change proposed. The Delivery and Implementation chapter and Infrastructure Delivery Plan provide details on the requirements, phasing and funding of infrastructure.
Places, P5	Infrastructure and investment should be front loaded	1	workshop	Noted.
Places, P5	The number of existing cars in Park Royal should be reduced to minimise impacts of construction traffic	1	workshop	No change proposed. The Transport policies will ensure appropriate mitigation is secured to manage potential adverse impacts related to construction.
Places, P5	Highlighted area of Ealing whose interface into Park Royal is not good, better permeability is needed	1	workshop	Noted. The Park Royal Transport Strategy and the separate Public Realm, Walking and Cycling Strategy identify the opportunities to improve the quality and function of the movement network so that there are good connections for all users/modes across the area. There are significant constraints to increasing permeability and creating new connections around Park Royal due to the barriers created by the A40, A406 and railway lines. Therefore, the Park Royal places policies also seek to improve existing links to/from and over these infrastructure barriers.
Places, P5	Links with Imperial College and clean tech industries could mean new industries in the area.	1	workshop	Noted.

Places, P5	There is scope for a training institute	1	workshop	Noted.
Places, P5	Query whether low cost units will be protected.	1	workshop	The Employment policies (E1, E2 and E3) seek to ensure a mix of unit sizes, including small units, and low cost workspaces are provided.
Places, P5	Commercial property has not seen the growth rates that residential has seen	1	workshop	Noted.
Places, P5	Suggest removing permitted development rights for industrial change of use	1	workshop	Noted. OPDC has already taken steps to pursue this as a course of action. In September 2016, OPDC gave notice of the making of a non-immediate Article 4, which means a formal notice has been issued, to remove permitted development rights and to reintroduce the need for planning permission for the conversion of offices, storage or distribution centres to houses or flats within areas designated as Strategic Industrial Location (SIL) in OPDC's boundary.
Places, P5	Park Royal could be promoted as a place to live and work	1	workshop	Noted. The Local Plan policies support the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Location (SIL) boundary. Residential development is only being promoted on non-SIL sites including those in Park Royal Centre and around First Central and Brewery cluster.

Places, P5	Agree with early indicative capacity for the net additional homes and jobs	1	commonplace	Noted.
Places, P5	Do not agree with early indicative capacity for the net additional homes and jobs	1	commonplace	Noted. These targets have been updated in the Plan and are based on an understanding of the development potential of each site. These targets take into account the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Location (SIL) boundary. Residential development is only being promoted on non-SIL sites including those in Park Royal Centre and around First Central and Brewery cluster.
Places, P5	Support SIL boundary changes	1	commonplace	Noted.
Places, P5	Cannot put additional housing and jobs in Park Royal without significant improvements to the infrastructure	1	commonplace	Noted. The Park Royal place policies acknowledge that a number of improvements are needed to support this development in this area.
Places, P5	There are some older industrial premises which could be reused.	1	Hammersmith and Fulham Historic Buildings Group	Noted. OPDC's Heritage Strategy identifies older industrial premises of heritage value and OPDC's heritage policy (D8) seeks to protect these premises.
Places, P6	Town centre uses should be spread out rather than focussed in Park Royal Centre (i.e. near to transport interchanges/routes, extended up to the Wesley Estate)	4	London Borough of Brent, London Borough of Ealing, SEGRO, workshop	Noted. The priority is to protect the industrial uses and ensure future town centre development does not undermine their ability to function successfully. OPDC continues to propose that town centre uses in Park Royal are focussed in Park Royal Centre (P6). A cluster has been identified in Park Royal West (Brewery), which has also been identified as

				a potential location for small-scale town centre uses. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.
Places, P6	Should promote redevelopment of ASDA site to provide smaller retail units i.e. Leegate Shopping Centre	1	London Borough of Brent	Noted. The Park Royal Centre place (P6) supports additional town centre uses, including retail. The Town Centre chapter (TCC3) would also apply and require a mix of retail unit sizes.
Places, P6, Figure 44	Need to clarify whether town centre boundary includes Central Middlesex hospital	1	London Borough of Brent	Noted. The town centre boundary has been updated to include Central Middlesex Hospital. The hospital performs a key function within the town centre.
Places, P6	Would not support restricting residential uses in PRNC if it included area around the hospital.	1	London Borough of Brent	Noted. The Park Royal Centre policy supports a range of town centre uses, including residential uses, where they can be located and designed appropriately to ensure they would not compromise the Park Royal Strategic Industrial Location.
Places, P6	Should promote provision of social infrastructure, particularly crèche facilities, in Park Royal Centre	1	London Borough of Brent	Noted. The Park Royal Centre policy supports a range of town centre uses, including social infrastructure uses, where they can be located and designed appropriately to ensure they would not compromise the Park Royal Strategic Industrial Location.

Places, P6, Figure 44	Figures (44 and 88) showing SIL extension should be consistent.	1	Diocese of London	Noted. All figures in the Plan have been amended /updated.
Places, P6	Should not restrict new housing in PRNC	3	Goodies Foods Ltd, local resident, local resident	Noted. The Park Royal Centre policy supports a range of town centre uses, including residential uses, where they can be located and designed appropriately to ensure they would not compromise the Park Royal Strategic Industrial Location.
Places, P6	SIL expansion not supported	2	Goodies Foods Ltd, local resident	Change proposed. The part of Site E3.19 within the identified Park Royal Centre boundary will not be taken forward for SIL designation. It is noted that this already includes existing town centre uses and there is ongoing demand for town centre uses in Park Royal Centre so existing retail floorspace needs to be supported to remain. The other proposed SIL expansion sites are still proposed for SIL designation.
Places, P6	Concerned about the level of retail floorspace allocated to PRNC due to its potential impact on Harlesden.	1	Harlesden Neighbourhood Forum	Noted. The Local Plan puts in place appropriate safeguards to ensure that impacts on neighbouring centres are minimised. Impact Assessments are required for schemes above certain thresholds in Old Oak and proposals are required to submit a town centre enhancement strategy, where proposals are likely to have adverse impacts. However, officers agree with the need for close working with Brent Council and local community groups to ensure that Harlesden remains a successful town centre and this acknowledgement has been inserted in the Local Plan.
Places, P6	Support SIL expansion	2	London Borough of Ealing, local resident	Change proposed. The part of Site E3.19 within the identified Park Royal Centre boundary will not be taken forward for SIL designation. It is noted

				that this already includes existing town centre uses and there is ongoing demand for town centre uses in Park Royal Centre so existing retail floorspace needs to be supported to remain. The other proposed SIL expansion sites are still proposed for SIL designation.
Places, P6	Should be explicit that residential uses are not appropriate and seek to remove conflicting uses.	1	London Borough of Ealing	Noted. The Local Plan Employment, Park Royal West and Old Park Royal place policies are explicit in restricting development on SIL. Residential development is only being promoted on non-SIL sites including those in Park Royal Centre and around First Central and Brewery cluster.
Places, P6	Should not designate area as a neighbourhood centre, instead it should be designated as SIL	1	London Borough of Ealing	No change proposed. The Retail and Leisure Needs Study identifies the need for additional town centre floorspace across the area, including a requirement for 3,000 sqm of floorspace in Park Royal Centre. The Park Royal Centre policy has been developed to positively respond to, and seeks meet these development needs, in line with guidance in the NPPF. This approach is considered to be the most effective approach as it provides a clear strategy for accommodating growth.
Places, P6	Should not allow retail on SIL land which adjoins centres	1	London Borough of Ealing	Noted. New/additional town centre development, including retail uses, required in Park Royal will be focussed within Park Royal Centre town centre boundary. Park Royal Centre is outside of the SIL boundary. Some retail is also supported in the brewery cluster and the new Atlas Junction neighbourhood town centre

Places, P6	Question whether a retail target is needed given the flexibility of SIL policy to accommodate small-scale walk to facilities.	1	London Borough of Ealing	Noted. The Retail and Leisure Needs Study identifies the need for additional town centre floorspace across the area, including a requirement for 3,000 sqm of floorspace in Park Royal Centre. The Park Royal Centre policy has been developed to positively respond to, and seeks meet these development needs, in line with guidance in the NPPF. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.
Places, P6	PRNC is not a definable Place	1	London Borough of Ealing	Noted. The Park Royal Centre place policy sets out a range of measures to try and address existing issues and deliver 'place making' improvements in this area.
Places, P6	Little evidence of the PRNC being attractive for hotels	1	London Borough of Ealing	Noted. The Park Royal Centre place policy supports a range of town centre uses, where they are business focussed and can be located and designed appropriately to ensure they would not compromise the Park Royal Strategic Industrial Location. This approach allows for sufficient flexibility to respond to market demand as this changes over time.
Places, P6	Support for mixed use and concentrated local services	3	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Noted.

Places, P6	To be viable, uses and activities within the centre will need to be geared towards business users.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. The Park Royal Centre place policy supports a range of town centre uses, where they are business focussed and can be located and designed appropriately to ensure they would not compromise the Park Royal Strategic Industrial Location. This approach allows for sufficient flexibility to respond to market demand as this changes over time.
Places, P6	Issues in Park Royal (employment focus, traffic) are unlikely to be solved through measures proposed in the Local Plan.	1	Midland Terrace Resident's Group	Noted. The Park Royal place policy identifies appropriate measures based on the available evidence on the issues affecting this area and the potential solutions to address these.
Places, P6	Concerns regarding cost of public realm improvements and effectiveness of these	1	Old Oak Interim Forum	Noted. The Delivery and Implementation chapter and Infrastructure Delivery Plan provide details on the requirements, phasing and funding of infrastructure. The place policies identify appropriate measures based on the available evidence on the issues affecting these areas and evaluates effective options to address them.
Places, P6	Broad support for vision for central hub at PRNC Place	5	Midland Terrace Resident's Group, Old Oak Interim, SEGRO, TITRA, local resident	Noted.
Places, P6	New uses are proposed while it is still being maintaining as a major traffic interchange.	1	West Twyford Resident's Association	Noted. Minimising congestion and the need to support more people to walk and cycle in order to reduce vehicular traffic are key issues which the Park Royal place and Transport policies seek to address. The Park Royal Centre place policy identifies appropriate measures based on the available evidence on the issues affecting this area and the potential solutions to address these. The policy supports measures such as the junction

				realignment and new/improved pedestrian and cycling facilities.
Places, P6	It is not clear on how open green space will be provided and at what cost.	1	West Twyford Resident's Association	Noted. The Park Royal place policies identify opportunities for new public open space as part of new developments, including within the First Central and ASDA site. The provision and funding for these spaces would be secured through the planning process. In addition to this, as there are limited opportunities for new open spaces, improvements to existing open spaces will be supported.
Places, P6	Careful zoning is required between the different uses to make them work in a SIL area.	1	West Twyford Resident's Association	Noted. The Park Royal place and Employment policies will ensure that appropriate mitigation is in place so that there are no significant adverse impacts to the functioning of the SIL area and to amenity.
Places, P6	It is not clear how Park Royal Central interfaces with the Wesley Estate.	1	West Twyford Resident's Association	Noted. The vision for Park Royal Centre is for this to service the local business and residential community. The place policy includes measures to improve the public realm and pedestrian and cycling provision, particularly along key routes, to enhance the attractiveness of the area encourage people to use their local centre.
Places, P6	Support for a local market	1	workshop	Noted. The Park Royal Centre place policy supports a range of town centre uses, where they are business focussed and can be located and designed appropriately to ensure they would not compromise the Park Royal Strategic Industrial Location.

Places, P6	Include hospital within the Park Royal Centre designation	1	workshop	Noted. The town centre boundary has been updated to include Central Middlesex Hospital. The hospital performs a key function within the town centre.
Places, P6	New services suggested such as social infrastructure (opticians, dentists), restaurants/cafes and convenience stores	2	workshop, local resident	Noted. The Park Royal Centre place policy supports social infrastructure uses.
Places, P6	Should pedestrianise the ASDA site	1	workshop	Noted. The place policy includes measures to improve the public realm/environment for pedestrian and cyclists. Access for vehicles will required to support the existing and proposed new uses to support public transport provision and servicing of the units. Support for more sustainable modes of transport should help reduce the overall amount of car trips but some journeys may still be made by car.
Places, P6	Query whether ASDA is freeholder or leaseholder	1	workshop	Noted.
Places, P6	Do not agree with early indicative capacity for the net additional homes and jobs for Park Royal Centre	1	local resident	Noted. The homes and jobs capacity figures are based on an understanding of the development potential of identified sites. Further information is provided in the Development Capacity Study.
Places, P6	Additional homes should not just be concentrated on the fringes of Park Royal	1	local resident	Noted. Residential development is directed to land outside of SIL within Park Royal Centre and Park Royal West. The Park Royal Centre and Park Royal West policies support residential uses, where they can be located and designed appropriately to ensure they would not compromise the Park Royal Strategic Industrial Location.

Places, P6	Agree with early indicative capacity for the net additional homes and jobs for Park Royal Centre	1	local resident	Noted. The homes and jobs capacity figures have been updated based on an understanding of the development potential of identified sites. Further information is provided in the Development Capacity Study.
Places, P6	Suggest that some of the buildings are kept and reused	1	Hammersmith and Fulham Historic Buildings Group	Noted.
Places, P6	Public health should be embedded in all developments	1	workshop	Noted.
P7	Development in North Acton is devoid of any sense of place and has poor architectural quality	1	The Hammersmith Society	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
P7	More green space needs to be provided in North Acton	1	Grand Union Alliance	Change proposed. Policy P7 identifies a number of new and improved publicly accessible open spaces across the area.
P7	OPDC should restrict the amount of future student housing permissible in North Acton	1	The Hammersmith Society	Noted. The delivery of student housing is managed by policy H10.
P7	Broadly support policy approach	4	City and Docklands Property Group, Diocese of London, Imperial College London,	Noted.

			London Borough of Ealing	
P7	Proposals for the site at 6 Portal Way should be taken into account in the development capacity work for North Acton.	1	City and Docklands Property Group	Noted. This information has informed the Development Capacity Study (2017) and resultant minimum housing figure for North Acton and Acton Wells.
P2	Clarification is required on how proposals should support the delivery of Grand Union Street.	1	Diocese of London	Noted. Delivery of new streets will be implemented in accordance with guidance in the Delivery and Implementation Chapter.
P7	North Acton has an overconcentration of student housing. Support for broader mix.	8	Diocese of London, Midland Terrace Resident's Group, Old Oak Interim Forum, workshop, workshop, commonplace, commonplace, commonplace	No change proposed. The delivery of student housing is managed by policy H10. This requires proposals for student housing to contribute to the vibrancy and diversity of an area and not result in an overconcentration in any one specific location.
P7	PRS not supported/ should be limited	5	Midland Terrace Resident's Group, Old Oak Interim Forum, Wells House Road Resident's Association, workshop	No change proposed. Delivery of 'Build-to-rent' housing is managed through policy H6.

P7	Student housing should be restricted	6	Diocese of London, Wells House Road Resident's Association, local resident, local resident, workshop, workshop	No change proposed. The delivery of student housing is managed by policy H10. This requires proposals for student housing to contribute to the vibrancy and diversity of an area.
P7	Welcomes the requirement for new development to provide significant contributions towards and facilitate the delivery of improvements to North Acton station. Pre-feasibility study should be noted.	2	GLA, TfL	Noted. To support the future proofing of the Local Plan, reference to the pre-feasibility is not provided. The supporting text to policy P7 identifies the need for OPDC to work closely with TfL and Network Rail to deliver improvements.
P7	The suggested new station entrance seems to contradict Ealing's plans to create a Station Square	1	Grand Union Alliance	Noted. Policy P7C1 requires development to coordinate enhancements of the station with the southern station square.
P7	The plans for extra housing on TfL land needs to be made explicit.	1	Grand Union Alliance	No change proposed. OPDC considers referencing enabling development over and the around the station to be sufficiently clear.
P7	Given lack of amenity space, Plan should provide justification on how further intensive development can contribute to the creation of a lifetime neighbourhoods in North Acton.	1	Grand Union Alliance	Change proposed. Policy P7 identifies a number of new and improved publicly accessible open spaces across the area. The supporting text to policy P7 sets out the justification for high density development and tall buildings in North Acton.
P7	OPDC needs to clarify what would remain as a SIL location.	1	Grand Union Alliance	Change proposed. Policy SP5 and the Local Plan policies map define the boundary of SIL.

P7	The issue of traffic calming needs to be addressed.	1	Grand Union Alliance	Change proposed. Policy P7 requires improvements to support walking and cycling across the area.
P7	Student housing should not be restricted in this location. Appropriate safeguards to protect conventional housing are already included in H10 and impacts can be managed.	3	Imperial College London, commonplace, commonplace	Noted. The delivery of student housing is managed by policy H10.
P7	The Plan shouldn't include a presumption that there is already an over concentration of student accommodation in North Acton.	2	Imperial College London, London Borough of Ealing	Noted. The delivery of student housing is managed by policy H10.
P7	Support delivery of new education and community uses, R&D, and incubator space	1	Imperial College London	Noted
P7	Supporting text should refer to and support the presence of Imperial College in the area	1	Imperial College London	Change proposed. Imperial College is referred to as a significant land owner within the supporting text to policy P7.
P7	The links between North Acton and Old Oak should be more direct and legible.	1	London Borough of Ealing	Change proposed. Policy P7 now refers to Old Oak High Street continuing to North Acton from Old Oak South.
P7	Plan should aim to ensure balanced housing provision	2	London Borough of Ealing, workshop	No change proposed. The delivery of student housing is managed by policy H10. This requires proposals for student housing to contribute to the vibrancy and diversity of an area and that proposals should not result in an

				overconcentration of student accommodation in any one specific location.
P7	Need to be clear that encroachment of retail into SIL is not appropriate	1	London Borough of Ealing	Noted. Policy P1 and relevant London Plan policies provide guidance for protecting industrial type uses within SIL.
P7	Active frontage should be a criterion for mixed uses in North Acton	1	London Borough of Ealing	Noted. Policy P7 identifies the required locations for active and positive frontages to provide a high quality public realm around mixed use developments.
P7	Local residents are very disappointed with the way North Acton has been developed. Would like to see a creation of real community and more successful Place.	3	Midland Terrace Resident's Group, WARA, workshop	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
P7	Would like further clarity on how issues with existing gyratory will addressed.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. Policy P7 provides guidance to improve walking and cycling across the area including the portion of Victoria Road south of North Acton Station.
P7	Would like to see planning decisions in North Acton to be taken by the OPDC	5	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, Wells House Road Resident's Association, WARA	Noted. OPDC will work closely with LB Ealing and the Greater London Authority to implement the policies of the Local Plan.

P7	Potential for LB Ealing to take a more robust approach to London Plan policy 7.7.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. OPDC will work closely with LB Ealing and the Greater London Authority to implement the policies of the Local Plan.
P7	The Plan should preserve the character of North Acton station, and the buildings of historical interest such as Monarch House and Perfume Factory.	4	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, Wells House Road Resident's Association	Change proposed. Policy P7 seeks to strengthen local identity and character by responding to the locally listed Elizabeth Arden Factory and other proposed locally listed buildings in the design of new development.
P7	Do not support density levels of 600 units per hectare anywhere in the OPDC area.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. Density ranges have been removed from the Local Plan. Policy SP9 requires the height of proposals to respond to public transport access and sensitive locations. Policy P7 provides further local guidance for building heights including potential locations for tall buildings around North Acton station, neighbourhood town centre, Old Oak High Street and other key routes that do not result in an overbearing wall of development. Height may be used to mitigate impacts of air and noise pollution from railways and roads. Generally lower heights are expected adjacent to sensitive locations such as existing residential areas. Policy D5 provides specific guidance for tall buildings with policy D6 providing guidance to protect amenity.
P7	Clarification required on the scheme of delegation with LB Ealing	2	Old Oak Interim Forum, Midland Terrace Resident's Group	Noted. This information is provided on OPDC's webpages.

P7	Support social infrastructure policy objective	4	Old Oak Interim Forum, Midland Terrace Resident's Group, TITRA, Wells House Road Resident's Association	Noted.
P7	Support certain transport infrastructure policy objectives	2	Old Oak Interim Forum, Midland Terrace Resident's Group	Noted.
P7	The access road to Victoria Industrial Estate/Monarch House near North Acton must be maintained and not used as open space.	1	SEGRO	Change proposed. Policy P7 and supporting figures continue to support the location and role of this route.
P7	Supports designation of North Acton centre	1	SEGRO	Noted.
P7	Would like further detail on how Perfume Factory and Brunel Road sites will be brought forward for housing and employment uses and relocation strategies.	1	SEGRO	Change proposed. Policy P7 and policy P8 provide guidance for these locations.
P7	Part k) should refer to the potential for over station development.	1	TfL	Change proposed. Policy P7 now refers to over station development.

P7	Part q) should take account of the comprehensive masterplan for the North Acton station and the wider area, including the potential for over station development and the provision of new public spaces in the wider area. Flexibility is required as this work is Still ongoing.	1	TfL	Change proposed. Policy P7 identifies a number of new and improved publicly accessible open spaces across the area. This is based on the Victoria Road and Old Oak Lane Development Framework Principles document.
P7	Concerned about building uses, heights and quality of development in North Acton	1	TITRA	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
P7	Concerned about past poor design and non-delivery of family housing and community needs.	1	Wells House Road Resident's Association	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations. Family housing is guided by policy H4. Community facilities are guided by policy TCC4.
P7	There needs to be more mixed tenure housing.	1	Wells House Road Resident's Association	Noted. Policy H3 provides guidance for housing mix. Policy H10 regarding student housing will also be implemented in North Acton.
P7	There needs to be more diversity in the range/quality of shops	1	Wells House Road Resident's Association, Local resident	Noted. Policy TCC1 continues to identify North Acton as a new neighbourhood town centre to help shape the retail offer.
P7	There is a need for additional school places to accommodate the needs of new families moving into the area	1	Wells House Road Resident's Association	Noted. OPDC's Infrastructure Delivery Plan sets out the requirement for school places to meet the need of the development. Relevant place policies, including P7 provide guidance for the potential location of schools.

P7	Concerned about the impact of tall buildings. Heights should be capped and cascade down	1	WARA	No change proposed. The London Plan directs tall buildings to Opportunity Areas. Policy SP9 requires the height of proposals to respond to public transport access and sensitive locations. Policy P7 provides further local guidance for building heights including potential locations for tall buildings around North Acton station, neighbourhood town centre and other key routes that do not result in an overbearing wall of development. Height may be used to mitigate impacts of air and noise pollution from railways and roads. Generally lower heights are expected adjacent to sensitive locations such as existing residential areas. Policy D5 provides further detailed guidance for managing tall buildings. The height of tall buildings will be determined on a case by case basis in accordance with the Local Plan, London Plan, NPPF and other relevant material considerations.
P7	Adequate local infrastructure should be provided. Existing health care infrastructure in North Acton is under pressure. Developments in North Acton should be contributing more towards healthcare provision.	1	WARA	Noted. OPDC's Infrastructure Delivery Plan sets out the requirement for social infrastructure to meet the need of the development. Relevant place policies, including P7 provide guidance for the potential location of social infrastructure.
P7	Existing residential streets should be identified as sensitive areas	1	WARA	Change proposed. Existing residential areas are identified as sensitive locations.
P7	The Barratts Green Road - North Acton road crossroads area should be allowed to develop as a very	1	local resident	No change proposed. This location is within the SIL designation. OPDC continues to propose that town centre uses in Park Royal are focussed in Park Royal Centre (P6). Policy TCC1 also

	small-scale retail and restaurant centre.			supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.
P7	Agree with number of jobs/homes	1	local resident	Noted.
P7	North Acton is currently 'self-enclosed'	1	workshop	Noted. Policy P7 provides guidance to connect North Acton with surrounding areas through new and improved streets.
P7	Existing retail in this area is 'student focused'	1	workshop	Noted. Policy TCC1 continues to identify North Acton as a new neighbourhood town centre to help shape the retail offer.
P7	Integrate East Acton with North Acton. Can link North Acton to rest of the area via Victoria Road	1	workshop	Noted. Policy P7 provides guidance to connect North Acton with surrounding areas through new and improved streets.
P7	More local services are required so people don't have to travel out of the area	1	workshop	Noted. Policy TCC1 continues to identify North Acton as a new neighbourhood town centre to help shape the retail offer.

P7	Would prefer hotel rather than more student housing	1	workshop	Noted. Hotels are defined as town centre uses and would be appropriate within North Acton neighbourhood town centre in accordance with policy P7.
P7	Should provide more green space in North Acton. It is not clear if existing open space will be protected. Policy should cover greenspace, landscaping/tree planting.	3	workshop, workshop, commonplace	Change proposed. Policy P7 identifies a number of new and improved publicly accessible open spaces across the area.
P7	Lifetime Neighbourhoods should be encouraged in north Acton, including family housing	1	workshop	Noted Policy SP2 requires proposals to contribute to the delivery of Lifetime Neighbourhoods across the OPDC area, including North Acton.
P7	It is too late to save North Acton from more student housing	1	workshop	Noted. The delivery of student housing is managed by policy H10.
P7	Support for access across North Acton station	1	workshop	Noted
P7	Could consider mixing light industrial with residential on northern side of North Acton station	1	workshop	Noted. The delivery of the subsurface portion of High Speed 2 through the OPDC area requires the use of natural ventilation to support its functioning. This will require the provision of an open air ventilation box north of North Acton Station. This will have significant impacts on the development of this area. OPDC will work closely with HS2 to explore what uses will be appropriate for this site. Likely uses include a mix of employment and town centre uses at ground and lower floors with potential for housing above.

P7	Should consider previous junction option which was planned	1	workshop	Noted.
P7	Question whether schools will cater for new or existing households and where the current pressures are in terms of school places	1	workshop	Noted. OPDC's Infrastructure Delivery Plan sets out the requirement for school places to meet the need of the development. Relevant place policies, including P7 provide guidance for the potential location of schools.
P7	Concerned about local school capacity (including Harlesden and Wembley) and potential travel times to schools	1	workshop	Noted. OPDC's Infrastructure Delivery Plan sets out the requirement for school places to meet the need of the development. Relevant place policies, including P7 provide guidance for the potential location of schools.
P7	Question whether CIL contributions are sufficient given the value of the new properties	1	workshop	Noted. OPDC will be consulting its proposed CIL charging schedule later in 2017.
P7	Area, particularly Horn Lane, is heavily polluted. The policy omits environmental factors/impact	4	workshop, workshop, workshop, commonplace	Change proposed. Policy P7 provides spatial guidance for mitigating the impacts of air pollution. Policy EU4 provides general guidance to improve air quality.
P7	Concerns regarding student housing	2	workshop, workshop	Noted. The delivery of student housing is managed by policy H10.
P7	The area suffers from overdevelopment.	2	workshop, workshop	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.

P7	Should get rid of the cement works	2	workshop	Noted.
P7	Residential uses should not be encouraged in North Acton due to its poor environment (traffic, pollution, industrial uses). It should be commercial focussed.	1	workshop	No change proposed. Policy P7 supported a mixed use approach for North Acton reflecting its good public transport access. Policy P7 provides spatial guidance for mitigating the impacts of air pollution. Policy EU4 provides general guidance to improve air quality.
P7	North Action is poorly designed/unattractive and plan does not deal with this major issue	1	workshop	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
P7	There are enough eating and drinking establishments	1	workshop	Noted.
P7	Disagrees with development capacity figures	2	commonplace, commonplace	Noted. Updated development capacity figures have been produced in accordance with relevant PPG guidance.
P7	Difficult to find a good solution for North Acton, so a do nothing approach might be better unless major plans/interventions are possible	1	commonplace	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
P7	Would prefer to warehousing to the north etc. redeveloped with significantly more open space and lower rise housing and not replicate what has happened around the rest of North Acton	1	commonplace	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.

P7	North Acton would be better connection from Old Oak than East Acton. Concerned that links to East Acton would be detrimental to leisure use, nature conservation and heritage assets.	1	Hammersmith and Fulham Historic Buildings Group	Noted. Policy P7 identifies the continuation of Old Oak High Street to North Acton from Old Oak South. There is potential to provide a new walking and cycling route between the Victoria Estate and Westway Estate subject to feasibility.
P7	There are a few buildings in Victoria Road which could be retained.	1	Hammersmith and Fulham Historic Buildings Group	Noted.
P7	The pedestrian route from opposite the Castle Pub to Old Oak lane near the railway bridge, which is currently closed, could be reopened.	1	Hammersmith and Fulham Historic Buildings Group	Noted. Policy P7 identifies the potential to provide a new walking and cycling route between the Victoria Estate and Westway Estate subject to feasibility.
P7	Would like the “rocket” made of scrap metal outside the waste company to be retained.	1	Hammersmith and Fulham Historic Buildings Group	Noted.
P7	Imperial College have a keen interest in the North Acton area.	1	Imperial College London	Noted.
P8	Residential led development supported	1	104-106 Scrubs Lane & 108 Scrubs Lane	Noted.
P8	Higher density development west of Scrubs lane supported	1	104-106 Scrubs Lane & 108 Scrubs Lane	Noted.

P8	Comprehensive will support wider OPDC aspirations for coordinated development	1	104-106 Scrubs Lane & 108 Scrubs Lane	Noted.
P8	Broad support for vision and policy. Some amendments provided.	6	Aurora Developments Ltd, Ballymore Group, Historic England, Midland Terrace Residents Group, Old Oak Interim Forum, Old Oak Park	Noted.
P8	North Kensington Gate is suitable for a tall building	1	Aurora Developments Ltd	Noted.
P8	Tall buildings that contribute to place making and provide much needed housing should be considered in addition to heritage considerations	1	Aurora Developments Ltd	Noted.
P8	Development capacity - state as minimums	1	Aurora Developments Ltd	Change proposed. Policy P10 sets out minimum indicative targets for new homes and jobs.
P8	UK Tyres Exporters site suitable for redevelopment	1	Boropex Holdings Limited	Noted. Mitre Wharf is identified as a potential development site in the Development Capacity Study (2017) and in policy P10.

P8	The ‘sensitive edge’ notation is unclear.	1	Diocese of London	Change proposed. Policy SP9 identifies and depicts sensitive locations. This includes existing residential areas, open spaces and heritage assets.
P8	Access to Scrubs Lane from Wormwood Scrubs is adequate	1	Friends of Wormwood Scrubs	No change proposed.
P8	Support for improvement of the fencing and general maintenance of the Scrubs Lane margin. Charitable Trust should lead this.	1	Friends of Wormwood Scrubs	No change proposed. To accord with the Wormwood Scrubs Act, policy P10 seeks to improve access to the Scrubs for all Londoners through new and improved sensitive walking and cycling routes from surrounding areas.
P8	Utilise TfL indicative costings for width increase to Mitre Bridge.	2	GLA, TfL	Noted. This information will be used to inform the Scrubs Lane Supplementary Planning Document.
P8	Concern evidence base does not sufficient consider impact of tall buildings on heritage assets.	2	Historic England, local community representative	Change proposed. The Scrubs Lane Development Framework Principles sets out an updated evidence base for building heights along Scrubs Lane include a Strategic Views Assessment considering the impact on heritage assets.
P8	Consider greater flexibility in housing and jobs targets to manage impact on character of Scrubs Lane	1	Historic England	No change proposed. Development capacity is based on the analysis set out in the Development Capacity Study (2017) and the Scrubs Lane Development Framework Principles (2017). This provides indicative information suitable for inclusion in the Local Plan as a strategic planning document.
P8	Policy should refer to ‘preserve or enhance’ rather than ‘conserve and/or enhance’.	1	LB Hammersmith and Fulham	No change proposed. To ensure consistency with the NPPF, the term conserve and enhance is utilised.

P8	Settings of listed buildings within St Mary's Cemetery and Kensal Green Cemetery should also be 'preserved or enhanced'. Setting of Historic Park and Garden at Kensal Green Cemetery should also be 'preserved or enhanced'.	1	LB Hammersmith and Fulham	Change proposed. Policy D8 refers to conserving and enhancing settings of heritage assets.
P8	Refer to large scale advertisements hoardings that line the frontages of many sites on Scrubs Lane detracting from the appearance of the street scene. The removal of advertisement hoardings causing substantial injury to visual amenity should be an objective.	1	LB Hammersmith and Fulham	No change proposed. OPDC considers that policy D2 provides sufficient guidance for ensuring advertisements have a neutral or positive contribution to amenity and public safety.
P8	Policy should be clear that the entire corridor would need to be considered and not just the OPDC portion	1	LB Hammersmith and Fulham	No change proposed. The Local Plan cannot set policy outside of the OPDC area. The supporting text of policy P10 identifies the need to work with relevant stakeholders outside of the OPDC area.
P8	Proposed taller elements are not compatible with the 'vision' of Scrubs Lane.	3	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Change proposed. The Scrubs Lane Development Framework Principles sets out an updated evidence base for building heights along Scrubs Lane. This includes a range of heights include four tall buildings located at new and improved east-west routes into Old Oak to support local legibility.
P8	Suggest a small 'creative hub'. Specific live/work policies could be developed, applying to a set of permanent moorings as well as to studio workspace.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Change proposed. This is now covered at the cluster for Atlas Junction (P8C1). Work-live is dealt with through Policy E4.

P8	Concerns regarding business displacement and services	3	Old Oak Interim Forum, Scrubs Lanes businesses, local community representative	Change proposed. P10C4 provide guidance for the delivery of clusters of activity at these locations.
P8	Concerns regarding deliverability of a continuous cycle route. Suggest delivery of route along eastern edge of Wormwood Scrubs and then into Old Oak North.	1	Old Oak Interim Forum	No change proposed. Policy P10 sets out the proposal for a continuous segregated cycle lane and improved foot path along the west of Scrubs Lane. The Scrubs Lane Supplementary Planning Document will provide further detail in relation to delivering these improvements along the eastern edge of Wormwood Scrubs. This will be carried out in accordance with policies EU1, EU2 and P12.
P8	Query regarding development potential of Mitre Industrial Estate and request relocation to Scrubs Lane place.	1	Old Oak Interim Forum	Change proposed. Mitre Industrial Estate is now included within the place of Scrubs Lane. This is reflected in policy P10. The Scrubs Lane Development Framework Principles sets out potential long-term development aspirations for the Mitre Industrial Estate. Any proposals will need to accord with policy E1 regarding existing employment floorspace.
P8	Location of B1 uses guidance is too prescriptive and should reflect potential for workspaces at lower floors of buildings. Remove reference to 'B1 (b) and B1 (c) within the preferred policy option for Land Use. Refer to only B1 uses.	1	Old Oak Park	Change proposed. Policy P10 requires employment floorspace to be provided along the ground and lower floors of development fronting on to Scrubs Lane. This includes small business space, B1a, B1c, B2 and B8 uses.

P8	Vehicular routes into Old Oak North - further detail on requirements needed. Two new vehicular routes are not required.	1	Old Oak Park	Change proposed. Policy P10 sets out the provision of four new and improved walking and cycling routes and one all modes route into Old Oak North.
P8	Figure 49 - define as illustrative	1	Old Oak Park	Change proposed. The Local Plan appendix identifies that maps in the document are indicative.
P8	Support for mid and high density guidance. Define Scrubs Lane as location for early delivery, including Willesden Junction.	2	QPR (NQP Development Services), Westkite Limited	Noted.
P8	Query lowering of density figures from OAPF to Local Plan in Scrubs Lane	1	QPR (NQP Development Services)	Noted. Development capacity has been updated and is based on the analysis set out in the Development Capacity Study (2017) and the Scrubs Lane Development Framework (2017).
P8	Support new connections to Old Oak. Highlight importance of connections to Willesden Junction and Hythe Road	1	QPR (NQP Development Services)	Noted.
P8	Recognise the important contribution of small businesses along Scrubs Lane	1	Scrubs Lane businesses	Change proposed. Policy P10 provides guidance for the provision of small business floorspace in accordance with policy E3.
P8	Maintenance is poor at Cumberland business Park.	1	Scrubs Lane businesses	Noted.

P8	Support for cycle way	1	TITRA	Noted. Policy P10 requires development to contribute to the delivery of a segregated cycle way along the west of Scrubs Lane.
P8	A higher density mixed use development could be located in the Cumberland Park business area including retail uses.	1	Westkite Limited	Noted. Policy P10 identifies the site for potential development including lower heights fronting the street and potential for tall heights adjacent to the railway. Retail floorspace on Scrubs Lane is focused at the four clusters. This site is located outside of a cluster. As such ground floor employment floorspace is supported.
P8	2,600 dwellings should be shown as a minimum	1	Westkite Limited	Change proposed. Policy P10 sets out minimum indicative targets for new homes and jobs.
P8	Support for segregated cycle lane	1	Local resident	Noted. Policy P10 requires development to contribute to the delivery of a segregated cycle way along the west of Scrubs Lane.
P8	Use former railway track for access to Mitre Industrial Estate	1	Local resident	Noted. This information will be used to inform the Scrubs Lane Supplementary Planning Document.
P8	Support new entrance into Wormwood Scrubs from the north linking to a central north/south spine, green spaces and canal crossing through Old Oak. Wormwood scrubs must retain wild character and must not be counted towards green space provision for new homes.	1	Local resident	Noted. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area as publicly accessible open space. This excludes Wormwood Scrubs and Kensal Green Cemetery.

P8	Support two new connections into Old Oak and walking and cycling routes.	1	Local resident	Change proposed. Policy P10 sets out the provision of four new and improved walking and cycling routes and one all modes route into Old Oak North.
P8	Support Conservation Area designation	3	Local residents	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.
P8	Willesden Junction to be a new place	1	Local resident	Change proposed. Policy P11 now provides specific place guidance for Willesden Junction.
P8	Conservation area restrictions on properties	1	Local community representative	Noted.
P8	Conservation area extension from St. Marys Conservation Area	1	Local community representative	Noted. This information will be used to inform future heritage workstreams outside of the scope of the Local Plan.
P8	Mitre Bridge Industrial estate development plans information request and concerns of impacts of development on Little Wormwood Scrubs and St. Marys Cemetery	2	Local community representatives	Noted. The Scrubs Lane Development Framework Principles provides guidance for development to the north and west of Little Wormwood Scrubs and area adjacent to St. Mary's Cemetery. This is reflected in policy P10.
P8	Northern end of Scrubs Lane should not be high density	1	Local community representative	Noted. Policy P10 identifies that the northern area of Scrubs Lane is appropriate for a range of densities, including high densities reflecting its proximity to the proposed Old Oak High Street and public transport access.

P8	Strengthen links to Harlesden High Street	4	LB Brent, Local residents	Change proposed. Policy P10C1 provides guidance for improving the public realm to support access to Harlesden town centre.
P8	Conservation Areas provide stronger management powers than Locally Listed Buildings	1	LB Brent	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.
P8	Support for low density	1	Local community representative	Noted. Place policies no longer provide specific density guidance. Policy SP9 provides broad guidance for delivering high densities in area of high levels of public transport access. Policy P10 and cluster policies provide guidance for building heights to respond to sensitive locations and support local legibility.
P8	Support for light industrial uses	1	Local resident	Noted. Policy P10 continues to support a range of B1 floorspace including B1c light industrial.
P8	Cumberland Park Factory warehousing is well maintained	1	Local community representative	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.
P8	Northern end of Scrubs Lane is suitable for early development	2	Local resident, student	Noted. This information is reflected in OPDC's Development Capacity Study (2017)
P8	Willesden Junction Station should be decked to help connections to Harlesden	1	LB Brent	Noted. Policy P11 supports optimising development on and/or adjacent to the station and tracks.

P8	OPDC should engage with communities along Scrubs Lane	1	Local community representative	Noted. OPDC has carried out two workshops with local residents and businesses to inform the Scrubs Lane Development Framework Principles.
P8	Clarity regarding form of connections to Old Oak needed	2	Local resident, local business	Change proposed. Policy P10 sets out the provision of four new and improved walking and cycling routes and one all modes route into Old Oak North.
P8	Concern regarding need to designation Cumberland Park Factory Conservation Area.	1	Local resident	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.
P8	Cumberland Park Factory could be reused for creative industries	1	Local resident	Noted.
P8	Define smaller scale neighbourhoods in Scrubs Lane	1	Local resident	Change proposed. Policies P10C1 to P10C4 provide guidance for smaller clusters along Scrubs Lane.
P8	Retail and leisure uses should be delivered	1	Local resident	Noted. Policy P10 directs retail and leisure uses to clusters along Scrubs Lane.
P8	Support for housing and jobs targets	1	Local resident	Noted.

P8	Support for density guidance	1	Hammersmith and Fulham Historic Buildings Group	Noted.
P8	Some buildings could/should remain. Providing access to Little Wormwood Scrubs should be considered.	1	Hammersmith and Fulham Historic Buildings Group	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017. This is reflected in policy P10. P10 also seeks to deliver to walking and cycling access to Little Wormwood Scrubs.
P8	Welcome proposals for a Scrubs Lane masterplan	1	Midland Terrace Residents Association	Noted. The Scrubs Lane Development Framework Principles fulfils this purpose.
P8	The Local Plan should also emphasise that such mixed-use development will also be encouraged at Scrubs Lane to provide a gateway to the new neighbourhood.	1	Westkite Ltd	Noted. Policy P10 provides guidance for the location of land uses along Scrubs Lane. This includes non-residential development at ground and lower floors facing on to Scrubs Lane with residential above. Within clusters non-residential uses are envisaged to be a mix of employment, leisure, retail and community uses. Outside of clusters, non-residential uses are envisaged to be employment uses.
P8	There are inconsistencies on the document for the boundary of the Scrubs Lane place, which is shown differently in Figures 49 and 23	1	Hammersmith and Fulham Historic Buildings Group	Noted. Policy P10 provides a definitive amended boundary for the Scrubs Lane place.
P8	Support Policy P8	1	Ballymore Group	Noted. Policy P10 now provides guidance for Scrubs Lane.

P8	Should protect the old warehouse buildings on Scrubs Lane	1	Resident	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.
P8	Should protect Westmoreland House as a heritage asset	1	Resident	No change proposed. OPDC's Heritage Strategy has undertaken a detailed analysis of existing and potential heritage assets within the OPDC area. Westmoreland House was not identified as a potential heritage asset.
P8	Support designation of Cumberland Park Factory Conservation Area	1	Hammersmith and Fulham Historic Buildings Group	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.
P9	The Old Oak West place policy should encourage SIL uses but push for more appropriate light industrial or preferably commercial/office/business/studio use rather than dirty heavy industry	1	Resident	Noted. Policies P9 and P8 now provide guidance for Old Oak West. P9 identifies Channel Gate to continue to be designated as SIL but as an industrial innovation area at higher densities. These may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P9	Old Oak West (P9) should be identified as being appropriate for housing	1	1 Resident	No change proposed. Policies P9 and P8 now provide guidance for Old Oak West. P9 identifies Channel Gate to continue to be designated as SIL but as an industrial innovation area at higher densities. These may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P10	Mitre Bridge Industrial Estate should be merged into the Scrubs Lane place. It's not clear why this relatively modern estate is being proposed for housing development	2	Old Oak Interim Forum, 1 resident	Change proposed. The Mitre Bridge Industrial Estate is now part of the Scrubs Lane place, managed by policy P10. This proposes a mix of uses for the area reflecting the site's proximity to future public transport services.

P9	The adopted West London Waste Plan includes future contingency for waste plants to be sited at nearby sites such as the HS2 / Atlas Road compound which we also regard as unacceptable.	1	TITRA	No change proposed. OPDC has adopted the West London Waste Plan. This is reflected in policy EU6. Policies D6, P8 and P9 require impacts of SIL uses, including waste management, to be mitigated in terms of residential amenity.
P9	Northern HS2 compound could be used for social infrastructure in the long term	1	Workshop	No change proposed. Policies P9 and P8 now provide guidance for Old Oak West. P9 identifies Channel Gate to continue to be designated as SIL but as an industrial innovation area at higher densities.
P9	Support uses that have a more positive relationship with the canal than standard industrial uses.	1	Canal and River Trust	Noted. Policies P3 and P9 provide guidance for delivering industrial uses that have a positive relationship with the canal through the delivery of positive frontages and improved public realm.
P9	Figure 51 does not show Metroline Depot.	1	Harlesden Neighbourhood Forum	Noted. Figure supporting policy P8 identifies the Metroline Depot.
P9	The Plan should recognise that Metroline bus depot site is detached from Park Royal and Old Oak - it should be treated as part of Harlesden.	1	Harlesden Neighbourhood Forum	No change proposed. The Metroline Depot is identified to be part of Old Oak Lane and Old Oak Common Lane place. Policy P8 provides guidance for the Depot and its relationship with surrounding areas in Harlesden.
P9	Consider use of design codes to support sensitive development within context the conservation area	1	Historic England	Noted. Inclusion of a design code within the Local Plan is not considered to be appropriate given the Local Plan's strategic role. However, policies D8 and P8 provide guidance for managing the impact of development on heritage assets and their settings.

P9	Encouraged to have an up to date conservation area appraisal as part of the evidence base	1	Historic England	Noted. OPDC has identified the need to review existing conservation area designations to consider potential updates. This will be carried out in 2018.
P9	Illustrations in the Plan do not relate to London or show how development will help create a sense of place	1	Historic England	Noted. Illustrations are being removed from the Regulation 19 version of the Local Plan.
P9	Support approach to Old Oak West	1	London Borough of Ealing	Noted. This approach is continued in policies P8 and P9.
P9	The principal consideration must be protecting the amenity of current residents and maximising the potential of improved accessibility.	1	London Borough of Ealing	Change proposed. Policies D6 and P8 provides guidance for managing the impact of development on residential amenity. Policy P8 sets out improvements to the street network reflecting long-term development phasing.
P9	Proposals should make every effort to limit traffic growth, divert lorries and mitigate its effects on Old Oak Lane to help make it a valued pedestrian environment	1	London Borough of Ealing, local resident	Change proposed. Policies D6 and P8 provides guidance for managing the impact of development on residential amenity. Policy P8 sets out improvements to the street network reflecting long-term development phasing.
P9	Support Old Oak West as an exemplar for high value SIL intensification and in making a successful transition/buffer between industrial zones and conservation area, and rest of Old Oak	1	London Borough of Ealing	Noted. Policies P9 and P8 now provide guidance for Old Oak West. P9 identifies Channel Gate to continue to be designated as SIL but as a industrial innovation area at higher densities. These may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P9	Old Oak West is also a key to the realisation of the strategy for Grand Union Canal	1	London Borough of Ealing	Noted. Policies P3 and P9 provide guidance for delivering industrial uses that have a positive relationship with the canal through the delivery of

				positive frontages and improved public realm along the towpath.
P9	The interaction of this site with Old Oak will be relatively limited and links to North Acton and the Shield site should be recognised	1	London Borough of Ealing	Noted. Policies P7 and P8 provide guidance for improving walking and cycling links along Old Oak Lane and Victoria Road to Acton Wells and North Acton. It also provides guidance for new east west links to Old Oak and Park Royal.
P9	Maximisation/intensification is difficult to achieve in practice	1	London Borough of Ealing	Noted. OPDC's Park Royal Intensification Strategy identifies deliverable typologies for high density industrial development.
P9	Conservation Area is facing prospect of long term freight consolidation centre.	1	Midland Terrace Resident's Group	Noted. Policies D8 and P8 provides guidance for managing the impact of development on heritage assets and their settings. OPDC has identified the need to review existing conservation area designations to consider potential updates. This will be carried out in 2018.
P9	Alternative Places suggested, including a transitional zone. Revisions are requested to Old Oak West, North and South. Detailed policies could be developed to shape these.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Change proposed. The place of Old Oak West has been replaced by new places of Old Oak Lane and Old Oak Common Lane and Channel Gate. Policies P8 and P9 provide guidance for these places.
P9	Old Oak West could be a mixed use transition zone (instead of a Business Park) between the industrial/employment land of Park Royal and the new 'Old Oak'. This could be allowed provided there is no reduction in business space and include A, B or D class and live/work uses subject to controls.	4	Midland Terrace Resident's Group, Old Oak Interim Forum, Hammersmith and Fulham Historic Buildings Group, workshop	No change proposed. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016).

P9	Bespoke policies could include specific design guidelines for mixed use development. A more flexible approach could provide the financial incentive for refurbishment or redevelopment.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. Policies SP5 and P9 continues to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016).
P9	Mixed use within the industrial area could provide 'more affordable' commerical and residential accommodation due to amenity issues - these could be used to house construction workers	2	Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. Policies SP5 and P9 continues to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P9	Welcome the Preferred Policy Option for Heritage but more information is needed on how this will implemented in practice and how it will guide positive planning decisions	2	Midland Terrace Resident's Group, TITRA	Noted. The aspiration is continued within policy P9. Policy D8 provides further detailed guidance to be used alongside London Plan policy 7.8 and the NPPF to guide decisions.
P9	Would like to see cultural heritage reinforced by positive local planning decisions.	2	Midland Terrace Resident's Group, TITRA	Noted. Cultural and social heritage is recognised within OPDC's Heritage Strategy. This has informed OPDC's 'heritage themes' guided by policy D8.
P9	Do not support construction of a transport consolidation centre at this location	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. Policy P9 no longer refers to the development of a transport consolidation centre.
P9	Potential to deliver more housing in Old Oak West	3	Midland Terrace Resident's Group, Old Oak Interim Forum, Raban Management Ltd	No change proposed. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016).

P9	Live/work within B use properties should be allowed	1	Old Oak Interim Forum	No change proposed. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Within SIL residential uses, including live/work are not supported by London Plan policy.
P9	Existing residential site should not be included as part of HS2 construction site. It should be recognised as a residential use.	1	Raban Management Ltd	Change proposed. This is reflected in relevant figures including those supporting SP9 and the policies map.
P9	Existing industrial units to the north east of the site should be allocated for residential use	1	Raban Management Ltd	No change proposed. Policies SP5 and P9 continue to designate these sites as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Within SIL residential uses, including live/work are not supported by London Plan policy.
P9	Object to HS2 compounds being used for SIL purposes. Only mixed or light industrial uses are acceptable.	2	TITRA, local resident	No change proposed. Policies SP5 and P9 continues to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P9	Welcome improvements to existing residential areas and protection against amenity impacts, including minimising construction traffic	2	TITRA, local resident	Change proposed. Policies D6 and P8 provides guidance for managing the impact of development on residential amenity.
P9	Support for residential uses outside of SIL areas where it supports the functioning of commercial (but not heavy industrial) uses within the SIL	1	TITRA	Noted.

P9	Should include an option that investigates allowing some traffic through Old Oak High Street or the north-south routes needed to develop the HS2 sites to relieve congestion on A4000.	1	TITRA	No change proposed. Policy SP4 provides guidance for the location of new and improved routes. HS2 construction routes are set out in relevant material of the HS2 London- West Midlands Act.
P9	Support improvements to public realm, frontages, greening and built environment.	1	TITRA	Noted.
P9	Should identify a series of smaller scale neighbourhoods that could develop their own character	2	TITRA, local resident	Change proposed. Policies P8C1 provides guidance for a smaller cluster at Atlas Junction.
P9	Local residents' areas should be protected. Site should be better used for residential and/or mixed use development rather than heavy industrial uses.	3	TITRA, Wells House Rd Residents Association, local resident	Noted. Policies D6 and P8 provides guidance for managing the impact of development on residential amenity. Policies SP5 and P9 continues to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016).
P9	Object to the siting of construction and freight consolidation centre. Plan should recognise impacts of SIL uses and attract uses which are compatible with residential uses.	3	TITRA, local resident, local resident	Noted. Policy P9 no longer refers to the development of a transport consolidation centre.
P9	Should increase the green buffer strip between Old Oak Lane Conservation Area and SIL	1	Local resident	Change proposed. Policies P8 and P9 now seek to expand Old Oak Community Gardens.

P9	Support development being sensitive and responsive to existing conservation areas.	1	Local resident	Noted.
P9	Other possible uses at this location in Old Oak West should relate to film/TV industry uses.	1	Local resident	No change proposed. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P9	Business park is preferred over heavy industrial uses (but not like Chiswick Park). This should be mixed use/finer grain and blend with existing character.	3	Local resident, workshop, local resident	No change proposed. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P9	Planning team should involve and work closely with the Island Triangle Residents Association on planning and conservation matters.	1	Local resident	Noted. OPDC continues to engage with community groups in accordance with OPDC's Statement of Community Involvement.
P9	Old oak Lane's pollution levels continue to breach EU legal limits.	1	Local resident	Noted. OPDC's Air Quality Study provides spatial guidance for improving air quality within the OPDC area. Policy P8 reflects this for Old Oak Lane.
P9	Atlas Road is becoming a lively hub. Want to promote vibrant uses on Old Oak Lane and Victoria Road by adding retail units and cultural centres.	1	Local resident	Change proposed. Atlas Junction is now proposed to be designated as a neighbourhood town centre in policies SP6 and P8.

P9	The Station Road area is an important link area with Harlesden and should either become part of the new P11 suggested above, or be treated separately with as a specific non-industrial site to link with Harlesden.	1	Local resident	Change proposed. The Station Road area is now identified to be within the place of Old Oak Lane and Old Oak Common Lane. The Harlesden Bus Depot continues to be designated as SIL.
P9	I am unclear how traffic would access a consolidation centre in the current location without creating even more traffic congestion.	1	Local resident	Noted. Policy P9 no longer refers to the development of a transport consolidation centre.
P9	Edge of Old Oak West should be more mixed use with small units which are compatible with the area.	1	workshop	No change proposed. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P9	Chiswick Park not be used as precedent	1	workshop	Change proposed. Chiswick Park is no longer identified as a precedent for Channel Gate.
P9	Existing communities should be integrated in one Place	1	workshop	Change proposed. Policy P8 now provides a single place for existing residential communities along Old Oak Lane, Victoria Road and Old Oak Common Lane.
P9	Old Oak West as transitional area	2	workshop, local resident	Noted.

P9	SIL should be protected	1	workshop	Noted.
P9	HS2 work sites development should be reconsidered after 2026, requirements/need will be clearer over time	1	workshop	No change proposed. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P9	Placemaking difficult on a large scale	1	workshop	Noted. The Local Plan provides guidance at a smaller station scale to support successful place-making.
P9	Can proposed tunnel on Dutton (Dudding) Hill Line be moved	1	workshop	No change proposed. This is outside of the scope of the Local Plan.
P9	Concern that new residents will not stay long or be integrated, feel/become part of the community (i.e. there is a shuttle bus to Willesden Junction, First Central)	1	workshop	Noted. Policy H3 provides guidance for delivering a housing mix to meet need. Policy P8 and P9 provide guidance for the location of new and improved open spaces to support social interaction.
P9	Would like to see independent stores in North Acton	1	workshop	Noted. Policy SP6 and P7 designate a new neighbourhood town centre at North Acton to help deliver a range of retail uses and sizes.

P9	Need social infrastructure to help people to meet/ integrate.	1	workshop	Noted. Policy TCC4 provides guidance for the delivery of social infrastructure.
P9	Student accommodation can bring activity to an area i.e. new shops	1	workshop	Noted. Policy H10 provides guidance for delivering student accommodation to deliver sustainable communities.
P9	Designate smaller estates in the area as part of one Conservation Area.	1	workshop	No change proposed. Designation of conservation areas is outside the scope of the Local Plan. OPDC's Heritage Strategy sets out proposals for new and updated conservation areas.
P9	Concerned about the impact and length of construction period	1	workshop	Noted. Policies D6 and P8 provides guidance for managing the impact of development on residential amenity.
P9	Midland Terrace should be included in Old Oak South or North so that communities can be more connected	1	workshop	Change proposed. Policy P8 now provides a single place for existing residential communities along Old Oak Lane, Victoria Road and Old Oak Common Lane.
P9	Industrial area could be more mixed use	3	workshop, workshop, workshop	Noted. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P9	New bridge over the canal allows an opportunity for traffic to bypass Old Oak Lane	1	workshop	No change proposed. Policy P8 sets out improvements to the street network reflecting long-term development phasing. This continues to

				delivery Old Oak Lane as the main north-south route within the area.
P9	Use Victoria Road to connect communities	1	workshop	Noted. Policies P7 and P8 provide guidance for improving walking and cycling links along Old Oak Lane and Victoria Road to Acton Wells and North Acton. It also provides guidance for new east west links to Old Oak and Park Royal.
P9	Support for young professionals living in the Collective concept	1	workshop	Noted.
P9	Extend Old Oak West further norht to Hillside, Acton Lane and Park Parade	1	Local resident	No change proposed. These areas are outside of the OPDC area.
P9	Support land uses in Old Oak West	1	Local resident	Noted.
P9	Support IBP uses on HS2 sites	1	Local resident	Noted.
P9	HS2 work sites are a suitable location for freight consolidation	1	Local resident	Noted.

P9	Agree with homes and jobs target for Old Oak West	1	Local resident	Noted.
P9	HS2 sites are better suited to office uses and green spaces.	1	Local resident	Noted. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
P9	Support criteria on conserving and enhancing the Conservation Areas	1	Local resident	Noted.
P9	Policy is missing criteria on improving air quality	1	Local resident	Noted. OPDC's Air Quality Study provides spatial guidance for improving air quality within the OPDC area. Policy P8 reflects this for Old Oak Lane.
P9	Suppor intensive SIL development with offices, innovation economy rather than heavy industrial uses	1	Local resident	Noted.
P10	The embankment to the north of the Scrubs should be retained to screen the proposed road on the IEP depot from the Scrubs	1	Friends of Wormwood Scrubs	Noted. The embankment is located within Wormwood Scrubs. As such it will be managed in accordance with the Wormwood Scrubs Act, Commons Act, policy EU1, EU2, P12 and relevant London Plan policies.
P10	Support the vision, so long as the Scrubs is preserved	1	Friends of Wormwood Scrubs	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.

P10	Do not support additional cycle routes on the Scrubs	1	Friends of Wormwood Scrubs	Noted. To accord with the Wormwood Scrubs Act and to support people reaching destinations, such as stations, and supporting access to Wormwood Scrubs from surrounding areas, policy P12 seeks to deliver new and improved sensitive walking and cycling routes across, to and from Wormwood Scrubs.
P10	Should encouraging use of social infrastructure such as Wormwood Scrubs	1	Workshop	Noted. To accord with the Wormwood Scrubs Act, policy P12 seeks to improve access to the Scrubs for all Londoners through new and improved sensitive walking and cycling routes from surrounding areas.
P10	Broad support for preservation of Wormwood Scrubs	6	Diocese of London, Friends of Wormwood Scrubs, Old Oak Park (DP9), TITRA, local resident, Hammersmith and Fulham Historic Buildings Group	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Clarify reference to nearby housing estate - should this be just Old Oak Estate?	1	Diocese of London	Noted. Policy wording has been amended to remove reference to nearby housing estate.
P10	Better promotion of Wormwood Scrubs across London would help make it more accessible.	1	Diocese of London	Noted. The vision for Wormwood Scrubs sets out the aspiration to make the open space more accessible to all Londoners.

P10	Welcome an approach/policy which sets out that OPDC should engage Friends of Wormwood Scrubs in future work and agree strategy/proposals with them	2	Friends of Wormwood Scrubs, London Borough of Hammersmith and Fulham	No change proposed. Policy P12 continues to set out commitments to agreeing proposals with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in discussion with local community groups.
P10	Sustaining Local Nature Reserve and sites of borough importance for nature conservation is important	2	Friends of Wormwood Scrubs, Hammersmith and Fulham Historic Buildings Group	Noted. Policy P12 provides guidance to conserve and enhance environmental designations of Wormwood Scrubs in accordance with policy EU2.
P10	Embankment should be retained as there is no reference to this in the Plan. These are essential and there are agreed ecological enhancements which include works to the embankment. OPDC should engage with LBHF and the Charitable Trust.	3	Friends of Wormwood Scrubs, workshop, workshop	Noted. The embankment is located within Wormwood Scrubs. As such it will be managed in accordance with the Wormwood Scrubs Act, Commons Act, policies EU1, EU2, P12 and relevant London Plan policies. Policy P12 continues to set out commitments to agreeing proposals with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in discussion with local community groups.
P10	Access must be sensitive to the character of the Scrubs. Need to consider the potential impacts on Wormwood Scrubs from new users.	3	Friends of Wormwood Scrubs, local resident, workshop	Noted. Any new sensitive walking and cycling routes will be delivered in accordance with the Wormwood Scrubs Act, Commons Act, policies EU1, EU2, P12 and relevant London Plan policies.
P10	The Plan is confusing in relation to access from the north. There are references to access being provided to the north and figures 102 p 253, 105 p 257, 110 p 261 show a potential route from the Station to the Scrubs. Figure 53	1	Friends of Wormwood Scrubs	Change proposed. Policy P12, its supporting text and supporting diagram set out the envisaged locations of new sensitive walking and cycling routes from Old Oak South and Old Oak North. These are expected to be delivered across a range of phases, including after the relocation of the Intercity Express Programme Depot.

	p115 does not show this. Also, the IEP depot is in the way of this route but the depot is unlikely to be moved.			
P10	Concern with/oppose access direct from the Station. This would cut through the sensitive north edge/embankment and could impact on the ecology of the site.	8	Friends of Wormwood Scrubs, London Borough of Hammersmith and Fulham, Community Group, workshop, workshop, workshop, workshop, Hammersmith and Fulham Historic Buildings Group	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. This is reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the station and adjacent areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	No need for access point from the station. Propose an access point at the north east corner of the Scrubs	4	Friends of Wormwood Scrubs, Midland Terrace Resident's Group, Old Oak Interim Forum, workshop	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the

				metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles document also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the station and adjacent areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	There is no need for more than one access point to the north of the Scrubs.	1	Friends of Wormwood Scrubs	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles document

				also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the station and adjacent areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	There is no need for a north-south route across the middle of the Scrubs (pedestrian or cycle).	1	Friends of Wormwood Scrubs	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the station and adjacent areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.

P10	There is no need for east/west access points to be changed and their enhancement/maintenance is the responsibility if the FOWS Trust.	1	Friends of Wormwood Scrubs	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the station and adjacent areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	Any measures to address surface water flooding should be consistent with the agreed ecological enhancement programme. Do not have enough information, plans or alternative options to be able to support this proposal.	2	Friends of Wormwood Scrubs, workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.

P10	Any ecological enhancements should be sensitive to the character of the Scrubs and should be decided by the Trust.	1	Friends of Wormwood Scrubs	Noted. Policy P12 provides guidance to conserve and enhance the biodiversity designations. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
P10	Access from the northern edge is restricted and see no need for a dedicated cycling connection to the Scrubs from the north. It is unclear as to how communities would be connected to the Scrubs.		Friends of Wormwood Scrubs	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.

P10	Retaining/protecting character of Wormwood Scrubs is the biggest priority. Impacts of increased usage should be considered.	18	Friends of Wormwood Scrubs, Andy Slaughter, Old Oak Interim Forum, The Hammermsith Society, TITRA, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Proposals suggested for ecological enhancements/objectives and key locations for this (i.e. scape areas, retaining/improving grassland, hedgerows, flashes, new habitats, improving woodland habitats).	1	Friends of Wormwood Scrubs	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	There is an area of vegetated embankment that is dominated by Japanese Knotweed; its removal provides an opportunity for habitat creation on site. These work needs to consider and mitigate for any impacts (i.e. on bird population, avoid unnecessary removal,	1	Friends of Wormwood Scrubs	Noted. Any work related to this removal will be carried out in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.

	selecting appropriate access routes).			
P10	There should be range of nesting boxes, dormouse boxes and hibernacula installed on site to support a diverse range of species. Particular locations, types and numbers would need to be discussed further and agreed on site.	1	Friends of Wormwood Scrubs	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	In order to monitor success full baseline surveys should be undertaken and repeated every 2-7 years after work is completed.	1	Friends of Wormwood Scrubs	Noted. OPDC carried out a Wormwood Scrubs Survey in 2016. This has informed policy P12 and will be used to inform future guidance and enhancements. Future surveys will be subject to further detailed work programming.
P10	Contributions to the production of a 10 year ecological management plan for Wormwood Scrubs including the enhancement and additions to the site.	1	Friends of Wormwood Scrubs	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	The detailed policy provisions set out for improvement will only be possible if high quality links are established between this space and Old Oak.	1	London Borough of Ealing	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends

				the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	Need to recognise the various designations of ecological protection – Site of Borough Grade 1 importance for Nature Conservation and the Local Nature Reserve.	2	London Borough of Hammersmith and Fulham, Old Oak Interim Forum	Change proposed. Policy P12 requires development to conserve and enhance the Local Nature Reserve and Site of Importance for Nature Conservation designations by ensuring proposals accord with policy EU2;
P10	Concerned about tall buildings being proposed near to the Scrubs.	9	London Borough of Hammersmith and Fulham, Midland Terrace Resident's Group, Old Oak Interim Forum, The Hammersmith Society, workshop, workshop, workshop,	Noted. Policy D5 provides guidance for managing the impact of tall buildings on their surroundings alongside general guidance for amenity in policy D6. Policy D7 sets out key views, including those from Wormwood Scrubs which proposals will need to include in views assessments.

			workshop, workshop	
P10	Support a dedicated cycle route on the eastern border of the Scrubs close to Scrubs Lane. There may be scope for continuing/linking such a route.	3	Midland Terrace Resident's Group, Old Oak Interim Forum, workshop	Change proposed. Policy P10 proposes the delivery of a segregated two-way cycle line along the eastern edge of Wormwood Scrubs.
P10	The access route should be designed to prevent it being used as a transit route and a boundary should be preserved between the Scrubs and Old Oak South.	1	Andy Slaughter	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further

				detailed work in consultation with relevant stakeholders.
P10	Need to clarify MoD rights over the Scrubs	1	Old Oak Interim Forum	Noted. Supporting text to policy P12 provides information related to the use of Wormwood Scrubs by the Ministry of Defence.
P10	Sustainable water management options should be explored further	1	Old Oak Interim Forum	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
P10	Further information should be provided on potential enhancements	1	Old Oak Park (DP9)	Change proposed. Potential sensitive enhancements are set out in policy P12 having been informed by the Wormwood Scrubs survey carried out in 2016.
P10	The MOL status should be emphasised in the vision and rest of the section.	1	The Hammersmith Society	Change proposed. Policy P12 clearly sets out the need for development to conserve and enhance Wormwood Scrubs reflecting its designation as Metropolitan Open Land.
P10	Wormwood Scrubs should not be used as a substitute for adequate on site provision or as a construction site.	1	The Hammersmith Society	Noted. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area as publicly accessible open space. This excludes Wormwood Scrubs. The Local Plan does not identify the need for using Wormwood Scrubs for construction purposes. Any proposal would be considered in light of policies in the Local Plan, London Plan and NPPF.

P10	Would oppose any network of hard paths/landscaping.	5	Friends of Wormwood Scrubs, The Hammersmith Society, workshop, workshop, workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	Object to Green Cross concept	2	The Hammersmith Society, workshop	Noted. The 'green cross' is no longer directly referenced in the Local Plan; however aspirations for improved north-south and east-west connections are reflected in Policy SP7 and in the relevant place policies.

P10	Access route should be relocated to the east.	3	The Hammersmith Society, workshop, Hammersmith and Fulham Historic Buildings Group	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles document also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	There is an opportunity for the canal towpath to be connected to the Scrubs.	3	The Hammersmith Society, workshop, workshop	Change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the

				metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north, including the Grand Union Canal, and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	This section should include policies to limit light pollution.	1	The Hammersmith Society	No change proposed. Policy D6 provides guidance for managing the impact of light pollution on private open space. Policy D5 provides guidance for managing the impact of light pollution from tall buildings on surrounding areas. London Plan policy 7.6 also provides guidance for managing impact of development on the amenity of surrounding land and uses.
P10	Only drainage to pitch areas should be considered.	1	The Hammersmith Society	No change proposed. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.

P1	The optimal railway scheme will still retain considerable scope for the mixed development of the remainder of the site, which we would strongly support.	1	The London Forum	Noted.
P10	Wormwood Scrubs should not be seen as an open space for the new Old Oak And Park Royal Development Corporation developments.Separate urban green space should be created and incorporated as part of new development.	4	TITRA, workshop, workshop, workshop	Noted. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area as publicly accessible open space. This excludes Wormwood Scrubs. The Local Plan does not identify the need for using Wormwood Scrubs for construction purposes. Any proposal would be considered in light of policies in the Local Plan, London Plan and NPPF.
P10	Should not authorise development that encircles and degrades the Scrubs	1	TITRA	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Wormwood Scrubs is well used and should remain unchanged.	1	Local resident	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Object to Wormwood Scrubs being included in OPDC area. Wormwood Scrubs should be planned for as a whole, including the stadium and car parks. LBHF should be the planning authority.	1	resident	No change proposed. OPDC will continue to work with stakeholders, including LB Hammersmith and Fulham to support place-making across the wider area.
P10	OPDC do not need to plan for Wormwood Scrubs as it is protected by its MOL status and the Wormwood Scrubs Act.	1	resident	No change proposed. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.

P10	Are concerned that there may be development on Wormwood Scrubs. This should not be allowed	5	Resident, workshop, workshop, workshop, workshop	Noted. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area as publicly accessible open space. This excludes Wormwood Scrubs.
P10	Planning approach has not evolved much in light of previous comments	1	workshop	Noted. Policy P12 has been updated to reflect previous comments to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Could make connections from North and South through Old Oak Common Lane and Wormwood lane	1	workshop	Noted. Policies P8 and P10 provide guidance for improving walking and cycling routes along Old Oak Common Lane and Scrubs Lane.
P10	Makes no sense to walk through a commercial area to do certain activities	1	workshop	Noted.
P10	Object to people crossing Scrubs to North Acton	1	workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of

				the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles document also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	Support people crossing east to west across Scrubs but not from HS2 across nature reserve.	1	workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north

				and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders and would need to appropriately conserve any ecological areas.
P10	Underpass into the Scrubs is not supported	3	workshop, community group, workshop	Noted. The form of the new walking and cycling connection from Old Oak Common Station will be subject to future detailed design work in consultation with relevant stakeholders.
D3	There is less provision for green space now than there has been in previous documents	1	workshop	Change proposed. Policy SP8 and policy EU1 provide guidance for the quantum of open spaces to be provided in accordance with the London Plan hierarchy of open spaces. Place policies provide guidance for their spatial distribution. This guidance seeks to deliver a minimum of 30% open space across the developable OPDC area outside of SIL.
P10	Is the location of the HS2 station fixed	1	workshop	Noted. The location of Old Oak Common Station is fixed and defined by the HS2 London-West Midlands Act (2017).
P10	The other part of the Scrubs is underused	1	workshop	Noted.
P10	Could be an access from north but this should not be from the station	1	workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the

				metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	Station is key element of development	1	workshop	Noted.
P10	Station doesn't have to be integrated with rest of development/ provide access to the south	1	workshop	Noted. OPDC considers the integration and embedding of the Old Oak Common station into the development fundamental to the successful regeneration of the area. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis.

				To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles document also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	People do not stay at stations	1	workshop	No change proposed. Policy P1C1 seeks to work with HS2 Limited to deliver a range of town centre uses within and around Old Oak Common Station to provide a destination for west London building on precedents such as St. Pancras International and Kings Cross.
P10	There are little gates to access Scrubs to the south	1	workshop	Noted. Policy P10 seeks to enhance these access points from Scrubs Lane.
P10	Do local people use other parks if they are not using the Scrubs	1	workshop	Noted.

P10	Question the London Plan's role in this	1	workshop	Noted. The London Plan is a component element of OPDC's development plan. As such its policies will be used to conserve and enhance Wormwood Scrubs as Metropolitan Open Land.
P10	Oppose cycling on the Scrubs	2	workshop, workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders. Any routes would need to appropriate conserve ecological areas, in accordance with Policies SP8 and EU2.

P10	Not worried about cycling	1	workshop	Noted.
P10	There should be proper fencing and gates to improve safety and access	1	workshop	Noted. The supporting text for P12 recognises the need to improve safety on Wormwood Scrubs.
P10	Traffic on Scrubs Lane impacts on environment of Scrubs	2	workshop, workshop	Noted.
P10	The Scrubs has some surface water issues	9	workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
P10	Retain tree planting	1	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Question the timespan for proposals	1	workshop	The 'plan period' for OPDC's Local Plan is 20 years.

P10	Should provide some access into the Scrubs	4	workshop, Friends of Wormwood Scrubs, Old Oak Park (DP9), workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severence, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	Should use existing routes to access Scrubs	1	workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and

				recreation for the inhabitants of the metropolis. Provision of new routes accords with this. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	Question whether route from station will be a natural desire line	5	workshop, The Hammersmith Society, Old Oak Interim Forum, Midland Terrace Residents Group, workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance and enable people to reach destinations such as stations, Hammersmith Hospital, Linford Christie Stadium and White City, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new

				walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The study identifies this as a natural desire line. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	Concerned about the impact on the environment and nature.	2	workshop, workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Don't mind change as long as it is done sensitively	1	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Should remove the word “inappropriate” from paragraph 6.24 of section D3: Open Space as this affects the Scrubs	1	workshop	Noted. This paragraph has been removed from the Local Plan.
P10	It is also provides well used pitches. This can cause problems in the car park.	2	workshop, Old Oak Interim Forum	Noted.

P10	Support for cycling activities but needs to be designed carefully and not impact on other activities	2	workshop, workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	Army has a right to train on Wormwood Scrubs	1	workshop	Noted. This information is reflected in the supporting text for policy P12.
P10	Potential for more toilet/changing facilities	3	workshop, workshop, workshop	Noted. Policy P12 provides guidance for delivering ancillary facilities to support the use of Wormwood Scrubs.
P10	There should be opportunities for unstructured/informal activities (bird watching, walking)	2	workshop, workshop	Noted. Policy P12 provides guidance for delivering sensitive enhancements.
P10	Children's play should be considered. There are opportunities to maintain existing facilities better	2	workshop, workshop	Noted Policy P12 provides guidance for the delivery of play space.
P10	Support for a café	3	workshop, workshop, workshop	Noted. Policy P12 provides guidance for delivering ancillary facilities to support the use of Wormwood Scrubs.
P10	Support for existing gym trails	1	workshop	Noted. Policy P12 provides guidance for delivering ancillary facilities to support the use of Wormwood Scrubs.

P10	Question who manages the pitches	1	workshop	Noted. Pitches are managed by LB Hammersmith and Fulham.
P10	Support for existing mix of uses	1	workshop	Noted.
P10	Use for picnics acceptable subject to impact on nature	1	workshop	Noted.
P10	Support for current arrangements for waste collection/management	1	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	Could integrate new facilities as part of improved Linford Christie Stadium	1	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	Station could provide toilet/changing facilities	1	workshop	Noted.
P10	Toilets have been vandalised in the past	1	workshop	Noted

P10	Object to lighting	2	workshop, workshop	No change proposed. Policy D6 provides guidance for managing the impact of light pollution on private open space. Policy D5 provides guidance for managing the impact of light pollution from tall buildings on surrounding areas. London Plan policy 7.6 also provides guidance for managing impact of development on the amenity of surrounding land and uses.
P10	Crime and safety concerns particularly at night	1	workshop	Noted. The supporting text for P12 recognises the need to improve safety on Wormwood Scrubs.
P10	Occasionally cars can be seen on the Scrubs even though its illegal	1	workshop	Noted.
P10	Pond could be located on western side of scrubs	1	workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
P10	Could consider additional tree planting	1	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Support for pond and role in separating pitches from nature area, nature conservation, whilst using existing topography and being in keeping with the Scrubs	5	workshop, workshop, workshop, workshop, workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan

				policies, policy EU1, policy EU2, policy EU3 and policy P12.
P10	Object to idea of a pond. Need to discuss/agree with Friends of Wormwood Scrubs	2	workshop, workshop	Noted. There are current surface water flooding issues on Wormwood Scrubs. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12. OPDC will work with stakeholders and agree any proposals with the Wormwood Scrubs Charitable Trust, the London Borough of Hammersmith and Fulham and in discussion with the local community to conserve and enhance Wormwood Scrubs.
P10	There would be management issues with any pond	3	workshop, workshop, workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12. Any management arrangements would specifically need to accord with policies EU1 and EU2.
P10	Should include a dark sky policy	1	workshop	No change proposed. Policy D6 provides guidance for managing the impact of light pollution on private open space. Policy D5 provides guidance for managing the impact of light pollution from tall buildings on surrounding areas. London Plan policy 7.6 also provides guidance for managing impact of development on the amenity of surrounding land and uses.

P10	Opportunity to consult with newly established Old Oak Estate TRA	1	workshop	Noted. Policy P12 sets out a commitment for OPDC will work with stakeholders and agree any proposals with the Wormwood Scrubs Charitable Trust, the London Borough of Hammersmith and Fulham and in discussion with the local community to conserve and enhance Wormwood Scrubs.
P10	Should help local schools make better use of the Scrubs	1	workshop	Noted. The supporting text for P12 recognises the need to improve safety on Wormwood Scrubs.
P10	Query about OPDC's relationship with HS2	1	workshop	Noted. OPDC is working positively, proactively and transparently with relevant stakeholders including the Department for Transport, High Speed 2, Network Rail and Transport for London to support the delivery of the station, associated works and the comprehensive regeneration of Old Oak South
P10	Potential for ground nesting should be identified	1	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	Sports pitches should be retained	2	workshop, workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
P10	Use walking routes to guide people away from nature	1	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	Could use for emergency landings for Heathrow	1	workshop	Noted. This is not proposed through the Local Plan and would contradict its designation as MOL.

P10	Running should be encouraged	1	workshop	Noted. Policy P12 provides guidance for delivering outdoor leisure facilities.
P10	Additional planting is supported	2	workshop, workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	Integrate this space with Little Wormwood Scrubs	1	workshop	Change proposed. Policy P12 seeks to improve connections between Little Wormwood Scrubs and Wormwood Scrubs.
P10	Should ensure access for all, including for pushchairs	1	workshop	Noted. Policy D3 provides guidance for delivering an inclusive and accessible environment.
P10	Scrubs supports incredible range of bird life	1	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	Drainage solutions should be placed near football pitches to help increase there use. Could speak to Kensington Dragons	1	workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
P10	Need to avoid environmental damage to Scrubs during the construction period, including HS2 proposals	1	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12. In particular, policy EU2

				requires proposals to avoid disturbance to biodiversity during construction.
P10	Question whether prison will remain	1	workshop	Noted. HMP Wormwood Scrubs is outside of the OPDC area and the scope of the OPDC Local Plan.
P10	Should acknowledge Old Oak Estate	1	workshop	Noted. The diagram supporting policy P12 identifies Old Oak Estate.
P10	Would like a more gentle, wider, corridor to link the Scrubs with the rest of the area'	1	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	Liked the fact that Wormwood Scrubs is rural and then has an urban contrast	1	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Question about whether more walking and cycling routes planned on Wormwood Scrubs	1	workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends

				the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	Should consider 3 access points to Old Oak Common Station - east, central, west	1	workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane.

				These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
P10	Oppose access into Wormwood Scrubs	3	workshop, workshop, workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.

P10	Wormwood Scrubs needs investment	1	workshop	Noted. Policy P12 provides guidance to ensure the long-term management and maintenance of Wormwood Scrubs.
P10	Could increase accessibility through a greater focus on events and advertising in the local press and Hammersmith & Fulham borough literature.	1	workshop	Noted. The vision for Wormwood Scrubs sets out the aspiration to make the open space more accessible to all Londoners.
P10	Having a great tube link will make it more accessible	1	workshop	Noted.
P10	Linford Christie Stadium is also part of Wormwood Scrubs.	1	workshop	Noted. Linford Christie Stadium is outside of the OPDC area. OPDC will continue to work with stakeholders, including LB Hammersmith and Fulham to support place-making across the wider area.
P10	Support for managing Scrubs/area for a wide variety of habitats and a large number of species.	1	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Access can be designed to protect nature; for example letting the woodland thicken up to discourage access at sensitive places and opening up gaps at the less sensitive places.	1	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	Wormwood Scrubs is already used by a wide range of users and for a variety of uses.	1	workshop	Noted.

P10	Protecting the sport and leisure uses is also important.	1	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	The importance of Wormwood Scrubs for model aircraft flying should be retained	1	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
P10	The integration of conflicting uses will take a special effort.	1	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
P10	Question what alternative plans/proposals would be if link does not happens - will it remain unattractive	1	workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane.

				These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
	The only route out of the Scrubs is a wobbly old bridge over the Central Line	1	workshop	Noted.

5. Sustainable Development

Section of Local Plan comments relates to	Issue summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SD1	Should add caveat clarifying that environmental policies are elsewhere in the Plan	1	LB Brent	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The structure of the document is considered to be sufficiently clear to enable readers to navigate to the Environment and Utilities Chapter.
SD1	Should reword criteria b) ('be approved without delay') as speed of decision making is not the only consideration.	1	Diocese of London	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The wording is required to demonstrate consistency with the NPPF
SD1	Policy should reference 5 guiding principles and 3 dimensions of sustainable development.	1	Grand Union Alliance	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The wording is considered to sufficiently define sustainable development in the context of the NPPF.
SD1	OPDC should specify how they will monitor 3 dimensions of sustainable development.	2	Grand Union Alliance, The Hammersmith Society	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The wording is considered to sufficiently define sustainable development in the context of the NPPF.

SD1	Refer to historic environment more clearly to ensure consistency with the NPPF	1	Historic England	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The wording is considered to sufficiently demonstrate consistency with the NPPF with regard to delivering sustainable development.
SD1	Existing borough Local Plans should also be a material consideration for applications	1	LB Hammersmith and Fulham	Noted.
SD1	Define sustainability	1	LB Hammersmith and Fulham	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The wording is considered to sufficiently define sustainable development in the context of the NPPF.
SD1	Section (a) of the PPO is fine as it is actually related to sustainable development. The remainder – (b) and (c) – seem to be quite generic policy commitments that are not specific to sustainable development issues. I suggest removing sections (b) and (c) from the PPO as they are unnecessary.	1	LB Hammersmith and Fulham	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The wording is required to demonstrate consistency with the NPPF
SD1	Broad support	2	Old Oak Park, Local resident	Noted.

SD1	Policy should reference willingness of OPDC pushing the boundaries for sustainable development	1	RBKC	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The wording is required to demonstrate consistency with the NPPF. The Spatial Vision, narratives and the Environment and Utilities Chapter set out OPDC's aspirations and requirements for pioneering international excellence in sustainability.
SD1	Refer to communities	1	Local resident	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The wording is required to demonstrate consistency with the NPPF. The Spatial Vision, narratives and strategic policies set out OPDC's aspirations for benefiting local communities.
SD1	This chapter should highlight the potential, intended outcomes and likely activities which would characterise a smart and sustainable area. It is not clear how the policy would aid decision making.	1	London Sustainable Development Commission	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The wording is required to demonstrate consistency with the NPPF. The Spatial Vision, narratives and the Environment and Utilities Chapter set out OPDC's aspirations and requirements for pioneering international excellence in sustainability.
SD1	Existing habitats should be maintained. Amenity and decorative planting could mitigate the effect of the area. Several sustainable design techniques could be used.	1	Hammersmith and Fulham Historic Buildings Group	The content of SD1 has been included within the supporting text for policy DI4. No change proposed. The wording is required to demonstrate consistency with the NPPF. The Spatial Vision and narratives set out the aspiration to conserve and enhance environmental assets with policy EU2 providing guidance for supporting and enhancing biodiversity.

6. Design

Section of Local Plan comments relates to	Issue summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D1	Next version of the Local Plan needs to be more specific about local context and reference local positive elements of character	4	LB Brent, student	Change proposed. Policy SP9 requires that buildings, public realm and infrastructure is of the highest design quality and architecture that responds to local character and context. The place policies also provide guidance that reflects the specific character and context for each place. London Plan policy 7.4 also provides guidance of local character.
	Aspiration for OPDC to deliver exemplary world class design	3	Diocese of London, Wells House Road Residents Association, Local resident	Noted. This aspiration for design quality is referenced in the spatial vision and policy SP2 and is embedded throughout the design chapter.

D1	Proposals should also demonstrate that accessible and inclusive, sustainable lifetime neighbourhoods will be delivered. Policy should be amended as: "Proposals will be supported where they demonstrate the delivery o***f high quality sustainable architecture to be delivered in high quality liveable, accessible and inclusive, sustainable lifetime neighbourhoods that are accessible to people of all ages, ability and incomes*** that:"	1	GUA	Change proposed. Policy SP9 requires that buildings, public realm and infrastructure is of the highest design quality and architecture that responds to local character and context, demonstrates high levels of sustainable design and accessible and inclusive design. The place policies also provide guidance that reflects the specific character and context for each place. SP2 requires that proposals should create mixed and inclusive lifetime neighbourhoods.
D1	Suggest policy on good lighting design to avoid light pollution.	1	GUA	Change proposed. Policy D6 provides guidance for managing the impact of light pollution on private open space. Policy D5 provides guidance for managing the impact of light pollution from tall buildings on surrounding areas. London Plan policy 7.6 also provides guidance for managing impact of development on the amenity of surrounding land and uses.
D1	Provide information about the Place Review Group including to ensure accessibility and inclusivity are properly considered.	2	The Hammersmith Society, Hammersmith and Fulham Disability Forum	Change proposed. Policy DI4 provides information for the Place Review Group. Policy D1 sets out guidance for making use of the Place Review Group. The Group is represented by experts from the field of accessible and inclusive design. Policy D3 provides guidance for delivering accessible and inclusive design alongside London Plan policy 7.2.

D1	Local access groups need to review major planning applications.	1	Hammersmith and Fulham Disability Forum	Change proposed. Policy D3 requires proposals to engage with relevant stakeholders to inform proposals in relation to accessible and inclusive design at the earliest opportunity. The supporting text of the policy refers to the GLA Strategic Access Panel and local access groups as stakeholders.
D1	Support and also look more broadly and encompass the wider context. In particular, the need to protect and enhance the exceptional asset of Kensal Green Cemetery	1	Historic England	Change proposed. Policy SP9 requires that buildings, public realm and infrastructure is of the highest design quality and architecture that responds to local character and context. This also refers to conserving and enhancing the historic environment. The place policies also provide guidance that reflects the specific character and context for each place. London Plan policy 7.4 also provides guidance of local character.
D1	Old Oak Outline Historic Area Assessment should be highlighted.	1	Historic England	Change proposed. The HE Old Oak Outline Historic Area Assessment is referred to as evidence base in policy D8.
D1	Support range of policy themes	1	LB Hammersmith and Fulham	Noted.
D1	Suggest an additional policy component relating to the provision of critical infrastructure	1	LB Hammersmith and Fulham	Change proposed. Policy SP9 requires that infrastructure is also of the highest design and architectural quality.

D1	Precedents in DCS aren't considered to be exemplar. Suggest alternative wording: 'Proposals will be supported where they demonstrate the best architectural and landscape design achievable within the constraints of density levels and estimated housing and employment targets set for each of the Places defined in this Local Plan'.	2	Old Oak Interim Forum, Midland Terrace Resident's Group	No change proposed. The DCS (2016) and DCS (2017) recognise that the precedents are identified in relation to densities. OPDC considers that high quality design can be achieved at all levels of density. Policy SP2 provides guidance for delivering sustainable development at appropriately high densities. Policy SP9 requires that proposals optimise development that delivers the highest design quality and architecture.
D1	Concerns raised for delivering exemplar design in high density development	1	Old Oak Interim Forum	No change proposed. The DCS (2016) and DCS (2017) recognise that the precedents are identified in relation to densities. OPDC considers that high quality design can be achieved at all levels of density. Policy SP2 provides guidance for delivering sustainable development at appropriately high densities. Policy SP9 requires that proposals optimise development that delivers the highest design quality and architecture.
D1	Broad support	1	Old Oak Park	Noted.
D1	Support the recognition that the policy should "respond to and enhance positive elements of existing local character."	1	RBKC	Noted. Policy SP9 requires that buildings, public realm and infrastructure is of the highest design quality and architecture that responds to local character and context. The place policies also provide guidance that reflects the specific character and context for each place. London Plan policy 7.4 also provides guidance of local character.

D1	Should include guidance on good industrial design and recognise that a flexible approach is needed.	1	SEGRO	Noted. Policy SP9 requires that buildings, public realm and infrastructure is of the highest design and architectural quality. This applies to industrial uses. Policy E2 provides guidance in relation to delivering appropriate new B use class employment floorspace.
D1	General concensus that Old Oak provides an opportunity to delivery good design	1	The Hammersmith Society	Noted. The Spatial Vision, narratives and policy SP9 set out OPDC's aspirations and guidance for delivering high quality design in Old Oak and Park Royal.
D1	Applications should demonstrate how planning applications will meet policies requiring high quality design	1	The Hammersmith Society	Noted. Applications will be required to demonstrate how they accord with all policies in the Local Plan. This process is set out in the supporting text for policy DI4.
D1	Support the delivery of a Character Study. Images in the Local Plan are poor quality.	1	The Hammersmith Society	Noted. OPDC's Character Study will be published as evidence base alongside the Regulation 19 version of the Local Plan.
D1	Suggest more creative/design people are added to planning committee.	2	Wells House Road Residents Association, Local resident	Noted. OPDC's planning committee is considered to have the appropriate range and balance of skills, knowledge and experience to fulfil its role and responsibility.
D1	Request to be involved in guiding architecture and urban design	1	Local resident	Noted. Information relating to consultation and engagement events are made available in accordance with OPDC's Statement of Community Involvement.
D1	Existing areas of housing should be retained adding to the variety of housing types and design	1	Hammersmith and Fulham Historic Buildings Group	Change proposed. Policy H5 provides guidance for protecting existing residential areas. OPDC's Heritage Strategy (2017) recognises the role of existing historic housing areas in informing the historic environment.

D2	Design codes should be developed to ensure the public realm is cohesive.	1	LB Brent	No change proposed. OPDC considers the Local Plan provides appropriate levels of guidance suitable for the role of a Local Plan. The Public Realm, Walking and Cycling Strategy and place specific development frameworks are providing guidance to ensure a coordinated public realm. Policy D2 sets out guidance requiring proposals to contribute to the delivery of a high-quality, inclusive, accessible and coordinated multi-functional public realm.
D2	Include requirement for public realm to incorporate urban green and SUDS to accord with London Plan Policy 5.10 and manage surface water flooding	2	LB Hammersmith and Fulham, LB Brent	Change proposed. In accordance with London Plan policy 5.10, Local Plan policy D2 identifies the need to facilitate the coordinated delivery of green and utilities infrastructure. This incorporates SUDS. Further detailed guidance is provided in policy EU2 and EU3 and spatial guidance for SUDS is provided in relevant place policies.
D2	Include additional criteria around prioritising sustainable transport modes	1	LB Brent	Change proposed. Policy SP7 requires proposes support the delivery of OPDC's Sustainable Transport Hierarchy including minimising the need to travel, supporting walking and cycling and delivering a high quality public transport network.
D2	Councils will need a maintenance dowry and may not have sufficient funds to adopt landscaping	1	LB Brent	Noted. Policy D2, EU1 and EU2 deal with appropriately securing management arrangements for open space, biodiversity and public realm.
D2	Support preferred policy. Churches contribute to a diverse streetscape.	1	Diocese of London	Noted.
D2	Refer to circular economy and innovative waste transport modes	1	Environment Agency	Change proposed. Policy T7 provides guidance for the transport of freight, including waste. Policy SP2 and policy EU7 set out guidance for aspects of the circular and sharing economy, including in relation to transport.

D2	Commit to ensuring public realm and furniture is useable by all including using smart city technology	1	GLA	Change proposed. Policies SP7 and D2 require proposals to contribute to delivering an accessible and inclusive public realm. Policies SP2 and EU11 provide guidance supporting and delivering smart city technology and approaches.
D2	Refer to community safety, public conveniences and not mixing walking and cycling	1	GLA	Noted. Policies SP7 and D2 require proposals to contribute to delivering a safe public realm. OPDC's Public Realm, Walking and Cycling Strategy sets out the approach to delivering a range of segregated and shared walking and cycling routes. This information is reflected in relevant place policies. Policy T1 sets out guidance for ensuring routes deliver positive outcomes against the 10 Healthy Streets Indicators. This includes ensuring that streets are designed with all potential users in mind, including vulnerable uses with specific requirements.
D2	Suggest additional elements to include in the policy relating to separating transport modes, balancing permeability & legibility with street enclosure, community facilities and balanced provision of local services	1	GUA	Noted. OPDC's Public Realm, Walking and Cycling Strategy sets out the approach to delivering a range of segregated and shared walking and cycling routes. This information is reflected in relevant place policies. The Strategy also sets out a proposed street network which is reflects in policy SP7 and relevant place policies. Policy T1 sets out guidance for ensuring routes deliver positive outcomes against the 10 Healthy Streets Indicators. Guidance for ensuring appropriate street enclosure is set out in policy D4 and London Plan policy 7.6. Guidance for the provision of social infrastructure is set out in policy TCC4.

D2	Alteration is proposed to clarify that better connections are required both within the OPDC Area and with neighbouring communities: " ‘contribute sensitively to connecting places within and immediately neighbouring the OPDC area and creating new public realm"	1	GUA	Change proposed. Policy SP7 requires proposals to contribute to connecting people and places through a high quality, safe and accessible movement network.
D2	Support segregation of pedestrians and cyclists. Would like an opportunity to comment on Public Realm/walking/cycling strategy. Figures in Plan do not illustrate inclusuve design principles.	1	Hammersmith and Fulham Disability Forum	Noted. Policies SP7 and D2 require proposals to contribute to delivering a safe public realm. OPDC's Public Realm, Walking and Cycling Strategy sets out the approach to delivering a range of segregated and shared walking and cycling routes. This information is reflected in relevant place policies. Policy T1 sets out guidance for ensuring routes deliver positive outcomes against the 10 Healthy Streets Indicators. This includes ensuring that streets are designed with all potential users in mind, including vulnerable uses with specific requirements.
D2	Preferred Policy Option in relation to advertisements should be expanded to include: ‘The OPDC will seek to secure the removal of advertisements which are the cause of substantial injury to amenity or public safety through the use of discontinuance notices.’	1	LB Hammersmith and Fulham	No change proposed. OPDC considers that policy D2 provides sufficient guidance for ensuring advertisements have a neutral or positive contribution to amenity and public safety.

D2	Seeking places to be connected may infer that more roads are sought. Further clarity needed to ensure sustainable modes are encouraged	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. OPDC's Public Realm, Walking and Cycling Strategy sets out the approach to delivering a range of segregated and shared walking and cycling routes. This information is reflected in relevant place policies. Policy T1 sets out guidance for ensuring routes deliver positive outcomes against the 10 Healthy Streets Indicators. This includes ensuring that streets are designed with all potential users in mind. Policy SP7 also requires proposes support the delivery of OPDC's Sustainable Transport Hierarchy including minimising the need to travel, supporting walking and cycling and delivering a high quality public transport network.
D2	Support adverts policy but could be made tighter	2	Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. OPDC considers that policy D2 provides sufficient guidance for ensuring advertisements have a neutral or positive contribution to amenity and public safety.
D2	Wayfinding - consider re-evaluation of importance of wayfinding given technology advances and use of land mark buildings	1	Old Oak Interim Forum	Change proposed. Policies SP7, SP2, EU11 and T2 provide guidance supporting and delivering smart city technology and approaches including through way finding.
D2	Broad support	1	Old Oak Park	Noted
D3	Temporary open space - should be subject to feasibility. Amend policy to: Amended to read "deliver temporary public open spaces that contribute to the vitality, character and activation of an area and supports the delivery of permanent development where feasible to do so."	1	Old Oak Park	Change proposed. Policies SP6 and TCC9 require meanwhile uses to support the longer term permanent uses planned for an area.
D3	Define figure 64 as illustrative	1	Old Oak Park	No change proposed. The Local Plan appendix states that all figures are indicative.

D2	Provide information for long term management of public realm and adoption of streets	2	The Hammersmith Society, Local resident	Noted. Policy D2, EU1, EU2, T1 and DI3 sets out the approach for OPDC to work with relevant authorities to manage the adoption and management of the public realm.
D2	Request for advertising policies	1	Local resident	No change proposed. Policy D2 provides guidance for ensuring advertisements have a neutral or positive contribution to amenity and public safety.
D2	Further restrictions are needed on adverts.	1	Local resident	No change proposed. OPDC considers that policy D2 provides sufficient guidance for ensuring advertisements have a neutral or positive contribution to amenity and public safety.
D2	Security needs to be integrated into all designs including CCTV, signage, lighting and in relation to underpasses	6	Local residents and students	Noted. Policies SP7 and D2 require proposals to contribute to delivering a safe public realm including providing a balanced approach between security and design of the public realm that delivers appropriate safety and security measures
D2	Alleyways are positive elements	1	Local resident	Noted.
D2	High street enclosure should enable them to feel open	1	Local resident	Noted. Guidance for ensuring appropriate street enclosure is set out in policy D4 and London Plan policy 7.6. Guidance for the provision of social infrastructure is set out in policy TCC4.
D2	Precedents suggested: Hamburg, Bristol, Portsmouth, New York, Europe, Due of York Place (Kings Road), Devonshire Square, Richmond Riverside, Paternoster Square, Mile End Park Green Bridge	4	Local resident	Noted. This information has been used to inform OPDC's Precedent Study (2017)
D2	Kings Cross lacks trees and enclosure	2	Local resident	Noted.

D2	Public spaces must be flexible	1	Local resident	Noted. Policy D2 provides guidance ensuring that the public realm is multi-functional.
D2	Improve public relam around Stonebridge and Harlesden Stations	1	LB Brent	Noted. Policy D2 provides guidance ensuring that proposals contribute to the delivery of a high quality public realm. It should be noted that the public realm directly adjacent to the both station entrances is outside of the OPDC area.
D3	Open spaces should be naturalistic	2	Local resident, The Hammersmith Society	Noted. Defining the typology of open spaces is considered to be beyond the scope of the Local Plan. Policy EU2 provides guidance for enhancing biodiversity across the OPDC area.
D2	Park Royal safety concerns and needs greening	2	Local resident	Noted. Policies SP7 and D2 require proposals to contribute to delivering a safe public realm including providing a balanced approach between security and design of the public realm that delivers appropriate safety and security measures. Policies P4, P5 and P6 provide guidance for delivering street greening within Park Royal.
D2	Railway lines create barriers	1	Local resident	Noted. The proposed movement network set out in policy SP7 seeks to address barriers created by transport infrastructure.
D2	Streets should not be cluttered and be managed through guidance. Public art should be provided by developers	1	Local resident	Noted. Policy D2 requires the delivery of a coordinated public realm and its coordinated elements, including public art.

D3	Local Plan should specific quantum and range of open space needed to meet the needs of the new community. These should be aligned to the London Plan categories. Open spaces should provide a range of roles including as attractions, social gatherings, community empowerment, street markets, quiet places, free wi-fi	9	Local resident, LB Brent, Diocese of London, Grand Union Alliance, The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group	Change proposed. Policy SP8 and policy EU1 provide guidance for the quantum of open spaces to be provided in accordance with the London Plan hierarchy of open spaces. Place policies provide guidance for their spatial distribution.
D3	Refer to All London Green Grid Area Frameworks	1	LB Brent	Change proposed. The All London Green Grid is referred to in Policy SP8 and the supporting text for policy EU1.
D3	Need to clarify that temporary open space is not a substitute for permanent space	1	LB Brent	Change proposed. Policy TCC9 requires meanwhile uses to support the longer term permanent uses planned for an area.
D3	Figure 64 should be based on London Plan categorisations, define open green space and civic space, show the canal as open space, provide clearer definition for public open space at First Central	1	LB Brent	Change proposed. Policy SP8 and policy EU1 provide guidance for the quantum of open spaces to be provided in accordance with the London Plan hierarchy of open spaces. Place policies provide guidance for their spatial distribution.
D3	Wormwood Scrubs and Kensal Green Cemetery shouldn't be used as amenity space for new development	1	Friends of Wormwood Scrubs, Grand Union Alliance	Noted. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area as publicly accessible open space. This excludes Wormwood Scrubs and Kensal Green Cemetery.
D3	OPDC should work with the boroughs to create additional green corridors, spaces and biodiversity provision to mitigate the impact of development and enhance nature.	2	Grand Union Alliance, The Hammersmith Society	Noted. Policy EU1, EU2 and DI3 sets out the approach for OPDC to work with relevant authorities to deliver new green infrastructure and enhance biodiversity.

D3	The following addition to the policy is proposed to facilitate the development of accessible and inclusive open space: • To the end of (b)v 'of all ages, abilities and incomes'. Feasibility studies should be undertaken at the pre app stage to ensure that that accessible and inclusive design features have been tested.	2	Grand Union Alliance, Hammersmith and Fulham Disability Forum	No change proposed. Policy D3 provides guidance for ensuring proposals deliver an accessible and inclusive built environment, including open spaces.
D3	Add bullet to policy on resilience to climate change	1	LB Hammersmith and Fulham	Change proposed. Policy SP2 requires development to deliver a low carbon and environmentally resilient development that is adaptive to and resilient to climate change. Policy EU1 requires open space to incorporate climate change mitigation measures.
D3	Broad support	4	Midland Terrace Resident's Group, Old Oak Interim Forum, Old Oak Park, The Hammersmith Society	Noted.
D3	Existing parks are in danger from the planned activities of the HS2. They will have to be preserved for the residents.	1	Midland Terrace Resident's Group	Noted. Policy SP8 and EU1 seek to protect existing open spaces.
D3	OPDC should commit to create green spaces/pocket parks to complement other existing residential areas.	1	Midland Terrace Resident's Group	Change proposed. Policy SP8 and policy EU1 provide guidance for the quantum of open spaces to be provided in accordance with the London Plan hierarchy of open spaces. Place policies provide guidance for their spatial distribution.

D3	Cemeteries unlikely to provide attractive and usable open space for leisure use or meeting open space requirement for developers	4	Midland Terrace Resident's Group, Old Oak Interim Forum, The Hammersmith Society, Local resident	Noted. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area as publicly accessible open space. This excludes existing cemeteries.
D3	Temporary open space will be important given development phasing	1	Old Oak Interim Forum	Noted. Policy TCC9 provides guidance for the delivery of meanwhile uses, including open space.
D3	Access Road to Victoria Road Industrial Estate needs to be maintained as it is. Open space allocation should be removed.	1	SEGRO	Change proposed. Policy P7 no longer identifies public open space in this location.
D3	Support encouragement of community management of Open Spaces.	1	The Hammersmith Society	Change proposed. Policy EU1 and DI3 encourage proposals to support community management of open spaces.
D3	The canal should be identified as an Open Space as it is in the OAPF, but should not be regarded by developers as providing the open space required within their housing developments.	1	The Hammersmith Society	Change proposed. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area as publicly accessible open space. This excludes the waterspace of the canal. The Canal itself is protected as open space as a Site of Importance for Nature Conservation.
D3	Railway embankments should also be regarded as providing beneficial open space	2	Local resident, The Hammersmith Society	Noted. Railway embankments within the OPDC area benefit from Site of Importance for Nature Conservation designations.
D3	Support for allotments	1	The Hammersmith Society	Noted. Policy EU1 supports local food growing.

D3	para. 6.24 P.134 : Second bullet point implies development might be acceptable unless it was considered 'inappropriate': Remove the word inappropriate from this sentence. Development would only be acceptable in the most exceptional circumstances.	1	The Hammersmith Society	Change proposed. This paragraph has been removed from the Local Plan.
D3	The retention of the Old Oak Sidings nature reserve may be incompatible with the adjoining uses and Old Oak High street. Other locations for a nature reserve next to the canal should be considered.	1	The Inland Waterways Association	Noted. The location and management of the nature reserve will be managed by policy EU1 and EU2.
D3	Public open space has to be more important than private open space.	1	Local Resident	Noted. OPDC considers that public, communal and private open space contribute to the delivery of a high quality green built environment. Policies SP8 and EU1 deal with public open space provision and require that 20% of the developable area outside of SII is delivered as public open space.
D3	Provide clarity between green space and open space	1	Local Resident	Change proposed. Open space definitions are provided in the Local Plan glossary.
D3	Provide open space for schools	1	Local Resident	Noted. The design of schools and associated open space is guided by TCC4 and national guidance. The potential location of schools within Old Oak has been considered the proximity of existing and future open spaces.
D3	Careful management of cemeteries of public open space is required	1	Local Resident	Noted. Policy DI3 sets out the approach for OPDC to work with stakeholders to support the management of cemeteries.

D3	In the middle of the North Acton Cemetery is a footpath, might be able to widen footpath	1	Local Resident	Noted. Any amendment to routes within the cemetery will need to be agreed with LB Ealing and stakeholder groups.
D3	Maintained public access to privately owned space is also welcomed.	1	Hammersmith and Fulham Historic Buildings Group	Noted. Policy D3 provides guidance for ensuring public access to relevant public spaces that are privately owned.
D4	Should promote mansion block typologies rather than tall buildings	5	LB Brent, Local residents	No change proposed. The provision of guidance on specific building typologies is not considered to be appropriate to the role of a Local Plan given its strategic nature. Each proposal will need to respond to its own context and will be guided by relevant policies. Local Plan policies SP9 and D4 provide guidance to deliver high quality design and architectural quality alongside London Plan policy 7.6.
D4	Should promote natural materials and also develop a design code.	1	LB Brent	Noted. Inclusion of a design code within the Local Plan is not considered to be appropriate given the Local Plan's strategic role. However, policy D4 requires development is use high-quality durable, adaptable and sustainable materials.
D4	'be mindful of their surrounding context and seek to improve the character and quality of the area.' This is consistent with the NPPF.	1	LB Brent	Noted. This aspiration is continued in policy D5
D4	Should cross reference London Plan policy 7.7	1	LB Brent	Change proposed. Policy D5 refers to relevant London Plan policies for tall buildings.
D4	Amend figure 70 - Roundwood Park and King Edward VII recreation ground should be highlighted as public open space.	1	LB Brent	Change proposed. These spaces are now shown as existing publicly accessible open spaces within policy SP8 and in OPDC's policies map.

D4	Omits Green Man Public House, High Road, W10 and 842 Harrow Road which are Grade II listed. In addition Kensal Green Cemetery is a Grade I Listed Park & Garden, whilst Roundwood Park is a Grade II listed Park & Garden.	1	LB Brent	Change proposed. These spaces are now shown as existing publicly accessible open spaces within policy SP8.
D4	Should list what studies applicants would be expected to submit for tall building applications	1	LB Brent	Noted. OPDC will be issuing its Validation Checklist for applications setting out requirements for all proposals.
D4	Broad support	1	Diageo Plc	Noted
D4	Tall buildings should be occupied and have active ground floor frontages.	1	Diocese of London	Change proposed. Policy D4 requires proposals to deliver high quality frontages. Given the envisaged mixed use nature of Old Oak, these could include active frontages for employment uses and town centre uses and/or residential front doors on to streets.
D4	Should reference circular waste management practices within design policies	1	Environment Agency	No change proposed. The circular economy is referred to in policy SP2, EU6 and EU7 which will be used to inform the design of proposals.
D3	Not enough open space proposed	1	Friends of Wormwood Scrubs	Change proposed. Policy SP8 and policy EU1 provide guidance for the quantum of open spaces to be provided in accordance with the London Plan hierarchy of open spaces. Place policies provide guidance for their spatial distribution. This guidance seeks to deliver a minimum of 30% open space across the OPDC area.
D4	Support policy context in relation to being visually attractive	1	Friends of Wormwood Scrubs	Noted.

D4	Managing impacts of tall buildings on the Scrubs and local views is important around station near to Wormwood Scrubs	10	Friends of Wormwood Scrubs, Local residents	Noted. Policy D5 provides guidance for managing the impact of tall buildings on their surroundings alongside general guidance for amenity in policy D6. Policy D7 sets out key views, including those from Wormwood Scrubs which proposals will need to include in views assessments.
D4	Managing impacts of tall buildings on cemeteries	2	Local residents	Noted. Policy D5 provides guidance for managing the impact of tall buildings on their surroundings alongside general guidance for amenity in policy D6.
D4	Concern over extensive high rise developments and impacts on skyline and liveability.	1	Grand Union Alliance	Noted. Policy D5 provides guidance for ensuring tall buildings deliver the highest standards of design, including making a positive contribution to the skyline, public realm and consider cumulative impacts. It also sets out the need for proposals to deliver significant benefits for surrounding communities and potential users of tall buildings.
D4	Concern that tall buildings within the OPDC area will negatively impact communities living in the boroughs adjacent to the development area	3	Grand Union Alliance, Local residents	Noted. Policy D5 provides guidance for ensuring tall buildings deliver the highest standards of design, including making a positive contribution to the skyline, public realm and consider cumulative impacts. It also sets out the need for proposals to deliver significant benefits for surrounding communities.

D4	Should be optimising density rather than making density and high-rise inseparable.	1	Grand Union Alliance	Change proposed. OPDC recognises that building heights and densities are related yet separate elements. Policy SP2 refers to delivering high densities with policy SP9 requiring development to be optimised with high densities and tall buildings in areas of high levels of existing or planned public transport accessibility. Building heights are provided for relevant locations with place policies.
D4	Concern that the high-rise blocks, might be left empty.	2	Grand Union Alliance, The Hammersmith Society	Noted. Policy H1 seeks to ensure that wherever possible, new homes are marketed to and occupied by people who live and work in London.
D4	The management and maintenance costs of high-rise homes are much higher than those of lower-rise homes making it difficult to change tenure and include affordable housing.	2	Grand Union Alliance, The Hammersmith Society	No change proposed. OPDC's Affordable Housing Viability Assessment (2017) identifies that the delivery of affordable housing is viable within the high density development context of Old Oak and non-SIL locations of Park Royal at policy compliant percentages.
D4	OPDC should o examine both good and bad examples of optimising density without having to develop high-rise buildings.	2	Grand Union Alliance, The Hammersmith Society	Noted. OPDC's Precedent Study (2017) provides an updated range of density precedents at varying building heights.

D4	Policy D4 should have an additional section that focus on the following elements relating to design of new buildings: • Creating neighbourhoods that have a sense of community ownership and security where children, older people and disabled people can feel safe; provide adequate community-oriented facilities and meeting places to support engaged and empowered communities. • Create adaptable and imaginative buildings that are designed to last for 150 years and use best materials and techniques in terms of sustainability. • Create neighbourhoods that are accessible and inclusive, thriving, human and beautiful, providing for whole communities with the spiritual makers, facilitators, educators and carers at their heart.	1	Grand Union Alliance	Change proposed. Policy SP2 requires development to contribute to the delivery of vibrant, mixed and inclusive lifetime neighbourhoods that delivers pioneering sustainable development resilient to climate change. The supporting text for the policy identifies that a key component of lifetime neighbourhoods is empowering local communities. Policy SP4 and TCC4 provide guidance for delivering social infrastructure and locations for social interaction. Policies SP9, D2 and D4 provide guidance for delivering a safe and secure environment. Policies SP9 and D3 provide guidance to deliver accessible and inclusive environments and the highest quality of design and architecture.
D4	Keen to work with OPDC on development of evidence base.	1	Historic England	Noted.
D4	Add sustainable design to policy	1	LB Hammersmith and Fulham	Change proposed. Policy SP2 seeks to deliver sustainable development that is resilient to climate change. Policy D4 sets out further guidance for non-residential development in addition to national standards.
D4	Policy should be subdivided into different building types	1	LB Hammersmith and Fulham	No change proposed. OPDC considers the level of detail to be appropriate to the role of the Local Plan as a strategic planning document.

D4	The height of new buildings are not clear. Old Oak and West London as a whole are free of tall buildings. Provide guidance for each place.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Change proposed. SP9 provides overarching guidance for the location of tall buildings and broad locations where heights should respond to sensitive locations. Policies D4 and D5 provide further guidance for massing and heights. Relevant place policies provide spatial guidance for building heights.
D4	A detailed Tall Buildings Strategy should be published as part of the Autumn 2016 second draft of the Plan.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. Where specific building heights are defined, these are supported by evidence base documents, including the Scrubs Lane Development Framework Principles document and Victoria Road and Old Oak Lane Development Framework Principles document. Elsewhere, guidance for broad locations for tall buildings is provided in SP9 and D5. This reflects the role of the Local Plan as a strategic planning document.
D4	The proposed viewing locations do not include points in the existing residential communities.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. OPDC's Views Study (2017) identifies viewing points from within a number of existing residential areas. This has informed policy D7.
D4	Local Plan does not state referral threshold for Tall buildings to the Mayor.	1	Old Oak Interim Forum	Change proposed. Local Plan glossary now defines referable schemes.
D4	London-wide debate needed to manage west London's skyline.	1	Old Oak Interim Forum	Noted. This is beyond the role of the Local Plan.
D4	Building heights policy not sufficiently flexible	1	Old Oak Park	Noted. The policy approach is considered to be appropriately robust and flexible. Where specific building heights are defined, these are supported by evidence base documents, including the Scrubs Lane Development Framework Principles document and Victoria Road and Old Oak Lane Development Framework Principles document. Elsewhere, guidance for broad locations for tall buildings is provided in SP9 and D5.

D4	Density policy not sufficiently flexible	1	Old Oak Park	Noted. Specific density ranges have been removed. Policy SP9 requires development densities to respond to sensitive locations, public transport access and accord with heights guidance set out in the place policies.
D4	Views Study should appraise impacts on Kensal Cemetery, Oxford Gardens Conservation Area, Kensal House, Ladbroke Hall and St Charles' Hospital.	1	RBKC	Noted. OPDC's Heritage Strategy has carried out a review of heritage views from assets that could be potentially impacted by development. Several views from Kensal Green Cemetery have been identified and are set out in the Views Study. The other assets were not considered to have sufficient potential to have their historic significance impacted due to their location away from Old Oak.
D4	Acknowledge that the design of industrial buidlings are influenced by its user.	1	SEGRO	Noted. Policy SP9 requires that buildings, public realm and infrastructure is of the highest design and architectural quality. This applies to industrial uses. Policy E2 provides guidance in relation to delivering appropriate new B use class employment floorspace.
D4	Define who will determine 'exceptional design standards and high quality materials'	1	The Hammersmith Society	No change proposed. The assessment will be carried out as part of the due open, transparent and impartial process for determining planning applications by the OPDC planning committee. Where appropriate, this will be delegated to planning officers.
D4	Key views should be considered along the canal.	4	The Inland Waterways Association, Local Residents	Change proposed. Views along the canal are identified on the map supporting policy D7.

D4	Concerns that density and height of new developments will negatively impact on WHR. Modelling requested	1	Wells House Road Residents Association	Noted. Policy D5 provides guidance for managing the impact of tall buildings on their surroundings alongside general guidance for amenity in policy D5. This includes existing residential areas which are considered to be sensitive locations.
D4	Design of new development should reflect existing local context.	13	Local residents, Hammersmith and Fulham Historic Buildings Group	Change proposed. Policies SP9 and D4 require development to respond to local character and context.
D4	Reference importance of the coherence of the skyline	1	Local resident	Noted. Policy D5 provides guidance for ensuring tall buildings deliver the highest standards of design, including making a positive contribution to the skyline.
D4	Quality of tall building design important	4	Local residents	Change proposed. Policies SP9, D4 and D5 require tall building proposals to be of high quality design.
D4	Pocket homes needed due to lack of space	2	Local resident	Noted. Policy H3 seeks to deliver a mix of dwelling types and sizes.

D4	Potential for a local view from North Acton?	1	Local resident	Change proposed. Key views are proposed that consider North Acton.
D4	Local views are subjective	1	Local resident	Noted.
D4	Views from Old Oak Estate are a positive feature	1	Local resident	Noted. These continue to be included in D7.
D4	Support for developing an interactive digital model to consider views	1	Local resident	Noted.
D4	Key view from Wormwood Scrubs to Trellick Tower	1	Local resident	Noted.
D4	Key view to Kensal Gas Holders	1	Local resident	Noted. This view has not been included as gas holders are likely to be removed as part of the development of Kensal Canalside.
D4	Buildings should be larger and a high quality	1	Local resident	Noted. Policies SP9, D4 and D5 provide guidance for delivering high quality building design, including for tall buildings.
D4	Park Royal to have tall buildings	2	Local residents	Noted. Policy SP9 identifies that tall buildings should be located in areas of good public transport access. Within Park Royal, outside of SIL designation, this is limited to the Brewery Cluster and ASDA cluster.
D4	Oppose any tall building	2	Local residents	No change proposed. The London Plan directs tall buildings to Opportunity Areas. Policy D5 and relevant place policies further refine the location of tall buildings within the OPDC area.
D4	Support for mixed use buildings	1	Local resident	Noted.
SI1	Provision of social infrastructure needed	1	Local resident	Noted. Policies SP4 and TCC4 require proposals to contribute to delivering infrastructure. Relevant place policies provide guidance for the location of these uses.
EU10	Improving air quality	1	Local resident	Noted. Policy EU4 provides guidance for improving air quality

D5	Suggest small amendment to part B i) to 'relate sympathetically to the upper parts of the building, adjoining properties and the part of the shop front to be retained.'	1	LB Brent	Former policy D5 has been combined with policy D4. Change proposed. Policy D4 requires proposals to relate sympathetically to the design and materials of the upper parts of the building, adjoining buildings and shopfronts and parts of existing shopfronts that are being retained
D3	Open space - not enough proposed	1	Friends of Wormwood Scrubs	Change proposed. Policy SP8 and policy EU1 provide guidance for the quantum of open spaces to be provided in accordance with the London Plan hierarchy of open spaces. Place policies provide guidance for their spatial distribution. This guidance seeks to deliver a minimum of 30% open space across the OPDC area.
D5	Broad support	1	GLA	Noted.
D5	OPDC should adopt similar approach to LBHF Planning Guidance SPD policy 1 to ensure accessibility.	1	LB Hammersmith and Fulham	Former policy D5 has been combined with policy D4. Change proposed. Policy D3 seeks to deliver an accessible and inclusive design for all development. Policy D4 recognises the need for all publicly accessible commercial uses, including shopfronts to be accessible and inclusive.
D5	Preferred Policy Option aii). should be expanded to include reference to materials as well as scale, form, height and mass.	1	LB Hammersmith and Fulham	Former policy D5 has been combined with policy D4. Change proposed. Policy D4 requires development to utilise materials that enhance local character.

D5	Reference inclusion of climate adaptation measures in policy	1	LB Hammersmith and Fulham	Former policy D5 has been combined with policy D4. Change proposed. Policy SP2 requires development to b) deliver a low carbon and environmentally resilient development, that is adaptive to and resilient to climate change. Policy SP9 and policy D4 provides guidance for delivering sustainable and resilient development.
D5	Shopfronts - alternative policy option should be applied in the proposed new canalside quarter places.	1	Old Oak Interim Forum	Former policy D5 has been combined with policy D4. No change proposed. The approach set out in former policy D5 has been continued in D4 to ensure canalside shopfronts deliver a high quality and accessible design.
D5	Broad support	1	The Hammersmith Society	Noted.
D4	Tall buildings are an exception	1	The Hammersmith Society	No change proposed. The London Plan directs tall buildings to Opportunity Areas. Policy D5 and relevant place policies further refine the location of tall buildings within the OPDC area.
D4	Above 30 metres in height requires a special assessment	1	The Hammersmith Society	No change proposed. All proposals will need to accord with SP9 and D4 to deliver high quality design. Tall buildings are defined in accordance with the Design Council and Historic England guidance as buildings taller than their surrounding context. Proposals for buildings of this height will need to accord with policy D5.
D4	Defining height should use meters not floors	1	The Hammersmith Society	Noted. This level of specification is beyond the scope of a Local Plan as a strategic plan.

D4	Density can be delivered without tall buildings	1	The Hammersmith Society	Noted. OPDC considers that high density development can be delivered at a range of heights responding to individual site opportunities and constraints. OPDC's Precedent Study demonstrates that at higher densities, taller elements will likely be required to deliver a high quality design that contributes to a high quality place.
D4	Provision of examples of tall building policies	1	The Hammersmith Society	Noted. In the drafting of D5, OPDC has reviewed other existing tall building guidance to inform its development.
D6	Retain existing historic buildings	5	Local residents, Hammersmith and Fulham Historic Buildings Group	Noted. Policies SP9 and D8 provide guidance for conserving and enhancing designated and non-designated heritage assets.
D6	Retain A + M building	1	Local resident	Noted. The A + M Building is identified as a proposed locally listed building.
P6	Improve ASDA public realm	1	Local resident	Noted. Policy P6C1 provides guidance for new and improve public realm within and around the ASDA site.
D5	Utilise covenants and tenants rules.	1	Hammersmith and Fulham Historic Buildings Group	Noted. Specifying the use of covenants and tenants rules is beyond the scope of the Local Plan as a strategic planning document.
D6	Heritage - densities need to consider heritage assets	1	Boropex Holdings Limited (Montagu Evans)	Noted. Policy SP9 identifies that densities should respond to sensitive locations. This includes designated heritage assets.

D6	Local list suggestions: Grand Junction Arms Stonebridge Station Willesden Junction Station 308-310 Elveden Road	1	LB Brent	Noted. These are identified to be potential local listed buildings. OPDC will consult on the proposed local list alongside the progression of the Local Plan prior to adoption.
D6	Protect existing residential areas	1	Local Resident	Change proposed. Policy H5 provides guidance for protecting existing residential areas. OPDC's Heritage Strategy (2017) recognises the role of existing historic housing areas in informing the historic environment.
D6	New conservation proposed for the Grand Union Canal in LB Brent	2	LB Brent, , The Hammersmith Society	Noted. OPDC's Heritage Strategy identifies the potential for the section of the Grand Union Canal in LB Brent to be designated as a Conservation Area. This will be taken forward in due course and consulted on in 2018.
D6	Support designation of Cumberland Park Factory Conservation Area	8	LB Brent, Diocese of London, Historic England, Midland Terrace Residents Group, Old Oak Interim Forum, The Hammersmith Society, Local resident, Hammersmith and Fulham Historic Buildings Group	Noted. The Cumberland Park Factory Conservation Area was designated by OPDC Board on 27 February 2017.

D6	To assist in conserving, enhancing and celebrating the historic significance of the area, it is suggested that the following are added to section (a): • (iv) 'survey' and create a local list of buildings of merit' • (v) 'memorialise the local vernacular industrial and social heritage' • (vi) promote community ownership of strategies and places (including a canal-side hub) on the history and culture of the area	1	Grand Union Alliance	Noted. OPDC's Heritage Strategy (2017) has carried out the survey of existing and potential heritage assets to inform OPDC's local list. OPDC will consult on the proposed local list alongside the progression of the Local Plan prior to adoption. The strategic also acknowledges the local industrial and residential heritage. These elements are reflected in policy D8.
D6	It is suggested that section (b) is altered to - • 'Proposals will be required to conserve and/or enhance the significance of heritage, contribute to respecting and celebrating the proud (industrial) history of the area as a starting point for new development and contribute to successful place-making	1	Grand Union Alliance	Change proposed. Policy D8 requires proposals to positively respond to the OPDC heritage themes in their design. This includes industrial heritage.
D6	Develop a Local List	5	Grand Union Alliance, Midland Terrace Residents Group, Old Oak Interim Forum, Wells House Road Residents Association, Local resident, Hammersmith and	Noted. OPDC will separately consult on the proposed local list prior to the adoption of the Local Plan.

			Fulham Historic Buildings Group	
D6	Local Plan should clarify that heritage assets should, wherever possible, be accessible and inclusive.	1	Hammersmith and Fulham Disability Forum	Change proposed. Supporting text to policy D8 recognises the principles that improving access to heritage assets while ensuring that any harm to significance is minimised and outweighed by the public benefit of securing access.
D6	Integrate results of Outline Historic Area Assessment	1	Historic England	Noted. OPDC's Heritage Strategy (2017) includes information from the Outline Historic Area Assessment. Both this elements have informed D8.
D6	Kensal Green Cemetery - mutually beneficial relationship with Old Oak development needed and impacts considered	2	Historic England, RBKC	Change proposed. Although OPDC is not responsible for the adjacent St. Mary's and Kensal Green Cemetery Conservation Areas, OPDC will work with Historic England and other stakeholders to remove these from the Heritage at Risk Register and ensure their settings are conserved and enhanced.
D6	Require developments to refer to historic area assessments and character appraisals.	1	Historic England	Change proposed. Policy D8 requires proposals' heritage assessments to refer to the OPDC Heritage Strategy.
D6	Refer to ability for CIL and s106 to enhance heritage.	1	Historic England	Noted. Consideration of using CIL to conserve and enhance heritage will be subject to the OPDC CIL consultation process. Consideration of using s106 contributions to conserve and enhance heritage will be subject to the consultation on the proposed OPDC Planning Obligations SPD.

D6	Preferred Policy Option a). and b). should be amended to refer to ‘preserve or enhance’ rather than ‘conserve, enhance’.	1	LB Hammersmith and Fulham	No change proposed. To ensure consistency with the NPPF, the term conserve and enhance is utilised.
D6	Preferred Policy Option aiii). in relation to Heritage at Risk is too vague and should be amended to read ‘promote the restoration of and secure the reuse and long term future of heritage assets on the Heritage at Risk Register’.	1	LB Hammersmith and Fulham	No change proposed. Within the OPDC area they aren't any heritage assets at risk. However, there are a number within the adjacent St. Mary’s and Kensal Green Cemetery Conservation Areas. OPDC will work with Historic England and other stakeholders to remove these from the Heritage at Risk Register.
D6	This should not just relate to heritage assets which is a clearly defined term but also to the historic environment in general. For example: · in policy D6 a ii: “ensure historic buildings and structures, in particular" heritage assets, contribute to improving and creating a sense of place;” · in policy D6 b: Proposals will be required to conserve and / or enhance "the historic environment and" the significance of heritage assets to contribute to successful placemaking.”	1	LB Hammersmith and Fulham	No change proposed. Policy SP9 refers to responding appropriately to the setting of designated and non-designated heritage assets. Policy D8 requires proposals to conserve and enhance the historic environment.
D6	Amend 'conserve and enhance' to 'preserve and enhance'	1	LB Hammersmith and Fulham	No change proposed. To ensure consistency with the NPPF, the term conserve and enhance is utilised.

D6	Query to wording of policy a) iii) "address Heritage at Risk". Query wording of policy b), and para 6.55 to be more in line with NPPF and distinguish between designated and undesignated assets.	1	Old Oak Park	Change proposed. Policy D8 provides specific guidance for both designated and non-designated assets alongside London Plan policy 7.8 and the NPPF.
D6	Amend to state "Proposals will be required to sustain and/or enhance to the significance of designated heritage assets. Conservation of the significance of undesignated heritage assets is desirable; redevelopment will require convincing justification."	1	Old Oak Park	No change proposed. Policy D8 provides specific guidance for both designated and non-designated assets alongside London Plan policy 7.8 and the NPPF.
D6	Refer to OOOHA appendix map.	1	Old Oak Park	No change proposed. The figure supporting D8 is considered to be appropriate to identify existing and proposed heritage assets.
D6	OPDC should strengthen its support for Old Oak Lane Conservation Area's built heritage / cultural assets in the Plan and throughout the planning process.	2	TITRA, local resident	No change proposed. As designated asset, policies SP9, D8, London Plan policy 7.8 and NPPF paragraphs 126 to 141 will be used to conserve and enhance the conservation area. The conservation area is also referred to in Old Oak Lane and Old Oak Common Lane place policy.
D6	The strong industrial and railway heritage of the site should be preserved.	1	Local resident	Change proposed. OPDC's Heritage Strategy identifies that industrial and railway heritage are important heritage themes. Policy D8 requires proposals to respond positively to these elements in their design.
D6	Heritage buildings should be adapted to create new landmarks.	1	Local resident	Noted. Adaptation of existing heritage assets will be managed by policies SP9, D8, London Plan policy 7.8 and NPPF paragraphs 126 to 141.

D6	Maintain Old Oak Estate	1	Local resident	Noted. As a designated conservation area, development will need to respond to the setting of the Old Oak Estate Conservation Area.
D6	Reinstate Wells House Road light house	1	Local resident	Noted.
D6	Work with local people to understand local history including place names	4	Local residents, Hammersmith and Fulham Historic Buildings Group, GUA	Noted. OPDC's Heritage Strategy provides an in depth analysis of the area's local history to help inform elements such as place and street naming.
D6	Designate conservation areas rather than locally listing assets	1	LB Brent	Noted. OPDC's Heritage Strategy identifies the potential for a range of new conservation areas and refreshes of existing conservation area designations alongside the development of a local list. New conservation areas will be taken forward in due course. OPDC will consult on the proposed local list alongside the progression of the Local Plan prior to adoption.
D7	D7 should include an additional criteria stating amenity and open space must provide a usable and comfortable environment.	1	LB Brent	Change proposed. Supporting text to policy EU1 refers to the need for high quality open spaces deliver usable and comfortable environments.
D7	Replace 'lifetime homes' with Building Regulations 'M4(2)'	1	LB Brent	Change proposed. References to building regulations are removed to prevent repetition of guidance.
D7	Oppose allowing greater impact to residential amenity to facilitate high density development	3	Diocese of London, Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. This approach is not being proposed in policy D6.
D7	Ensure amenity space is accessible	1	GLA	Noted. Policy D3 provides guidance for ensuring publicly accessible open spaces are inclusive and accessible.

D7	Need policy to cover hard and soft landscaping and trees	1	LB Hammersmith and Fulham	Noted. Policy EU2 provides guidance for urban greening.
D7	Apply amenity policies rigorously	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. All proposals will need to consider accordance with all relevant policies in the Local Plan and London Plan.
D7	Further clarification needed regarding privacy for workspaces.	1	Old Oak Park	Change proposed. Policy D6 provides guidance for deliver appropriate levels of privacy for all development. This will be considered on a case by case and informed by relevant material considerations.
D7	Repeat London Plan guidance on overshadowing, wind and microclimate	1	RBKC	Changes proposed. Policies D5 and D6 provide guidance for protecting amenity.
D7	Broad support	2	The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group	Noted.
D7	Designing in amenity in high density environments important	2	Local resident, Hammersmith and Fulham Historic Buildings Group	Noted. Policies SP9, D4 and D5 provide guidance for delivering high quality building design, including for tall buildings.
D8	Define relevant stakeholders	1	Diocese of London	Change proposed. Relevant stakeholders are defined in the supporting text to policy D3 as local access groups and the GLA Strategic Access Panel
D8	Establish Access Panel and publish an inclusive design handbook. Engage with local access groups	2	GLA, Hammersmith and Fulham Disability Forum	Noted. The OPDC Place Review Group has specific expert representation in accessible and inclusive design. OPDC will work with a range of stakeholders to achieve this aspiration including local access groups and the GLA Strategic Access Panel.

D8	Inclusive design should be a crosscutting policy.	2	GLA, Hammersmith and Fulham Disability Forum	Noted. The guidance set out in former policy D8 continues to be a cross cutting policy in D3.
D8	Street accessibility audit needed	1	GLA	Noted. OPDC's Public Realm, Walking and Cycling Strategy provides guidance for a new and improved street network. The Scrubs Lane and Victoria Road development framework Principles documents provide more detailed proposals for these locations. These recommendations ensure that the public realm is accessible and inclusive for all. This level of detail is considered to be appropriate for the Local Plan as strategic planning document.
D8	Ensure cycle routes are accessible	1	GLA	Noted. OPDC's Public Realm, Walking and Cycling Strategy provides guidance for new and improved cycle routes that are accessible.
D8	Provide commitment to providing blue badge parking even in car free developments	1	GLA	Noted. Policy T4 continues to secure parking provision for blue badge holders.
D8	Provide commitment to shopmobility schemes	1	GLA	Noted. Policy D4 seeks that all publicly accessible commercial uses, including shopfronts are accessible and inclusive. This level of detail is considered to be appropriate for the Local Plan as strategic planning document.
D8	London Access Forum no longer in existence	1	GLA	Noted. Supporting text now refers to the GLA Strategic Access Panel.
D8	Add to (a) after inclusive 'in terms of age, ability/disability and income'	1	GLA	No change proposed. Definition is provided within the glossary.
D8	Plan does not send a strong signal to the market that developers should come forward with accessible and inclusive proposals.	1	Hammersmith and Fulham Disability Forum	Change proposed. Spatial vision, narratives, policy SP9 and policy D3 set out OPDC's aspirations and guidance for delivering an accessible and inclusive environment.

D8	Local Plan should consistently reinforce London Plan policies on accessible and inclusive development.	1	Hammersmith and Fulham Disability Forum	Change proposed. Spatial vision, narratives, policy SP9 and policy D3 set out OPDC's aspirations and guidance for delivering an accessible and inclusive environment.
D8	All Local Plan policies should conform with the NPPF, PPG, Building Regulations and London Plan (and SPGs).	1	Hammersmith and Fulham Disability Forum	Change proposed. Spatial vision, narratives, policy SP9 and policy D3 set out OPDC's aspirations and guidance for delivering an accessible and inclusive environment. These are in conformity with the London Plan and consistent with the NPPF and PPG.
D8	P 24: 2nd bullet point: insert " accessible and inclusive" between "of) and design"	1	Hammersmith and Fulham Disability Forum	Change proposed. Spatial vision, narratives, policy SP9 and policy D3 set out OPDC's aspirations and guidance for delivering an accessible and inclusive environment. These are in conformity with the London Plan and consistent with the NPPF and PPG.
D8	We recommend changes: P 150 Preferred Policy Option: a) line 3 delete "exemplarily inclusive and accessible designed environment" and replace with "accessible and inclusive environment". b) i. line 1: insert "and inclusive" between "accessible" and "design" Justification: it is essential to use technical terms consistently. We consider that the narrative in the Regional Section on p 150 may need updating in para 6.72 to take account that the Government replaced references to lifetime homes standards with M4 (2) accessible and adaptable housing. 36. P 151 Para 6.78 line 3: insert	1	Hammersmith and Fulham Disability Forum	Change proposed. Spatial vision, narratives, policy SP9 and policy D3 set out OPDC's aspirations and guidance for delivering an accessible and inclusive environment. These are in conformity with the London Plan and consistent with the NPPF and PPG. Policy D3 requires proposals to engage with local access groups and the GLA Strategic Access Panel.

	“accessible and“ between “for” and “inclusive” Justification: it is essential to use technical terms consistently. We also recommend effective consultation with access groups in the e stages to avoid problems at later stages such as DET when some access and inclusion issues are impossible to resolve. We have had a constructive relationship with the developer and their consultants at the BBCTV redevelopment site in the White City Opportunity area where they took away our concerns and came back with an improved design for a direct route without complicated ramps and steps to accommodate a significant change in level.			
D8	Minimum space standards for housing; barriers to stepfree access and mitigation should be considered at the pre-app stage.	1	Hammersmith and Fulham Disability Forum	Noted. Policy H3 refers to Building Regulation M4(2) and M4(3). Policy D4 requires proposals to deliver well designed internal spaces that are suitable for their intended use, adaptable and contribute to a high quality of life of building users
D8	Need assurance that PLACE provide robust advice to accessible and inclusive design issues.	1	Hammersmith and Fulham Disability Forum	Noted. The OPDC Place Review Group has specific expert representation in accessible and inclusive design.
D8	Policies should be in place to ensure housing should be safe and secure	1	Hammersmith United Charities.	Change proposed. Policy D4 requires all buildings to provide a balanced approach between security and design of development that delivers appropriate safety and security measures

D8	Broad support	1	Old Oak Interim Forum, The Hammersmith Society	Noted.
D8	No stairs on pathways or stations	2	Local residents	Noted. OPDC's Public Realm, Walking and Cycling Strategy provides guidance for a new and improved street network. The Scrubs Lane and Victoria Road development framework principles documents provide more detailed proposals for these locations. These recommendations ensure that the public realm is accessible and inclusive for all.
D8	Development should consider the needs of blind and visually impaired people	1	Local charity	Noted. Policies SP9 and D3 require proposals to deliver development that is accessible and inclusive for all.
D6	Support for heritage strategy	1	Historic England	Noted.
D6	Visuals in Local Plan are of poor quality	3	The Hammersmith Society, local resident	Noted. Figures within the Local Plan are being amended.
D6	Consider settings of conservation areas	1	Local resident	Noted. To accord with legislation and the NPPF, proposals will need to respond to the setting of conservation areas.
D6	The Grand Junction Arms public house should be locally listed.	1	London Borough of Brent	Noted. The Grand Junction Arms public house is proposed to be locally listed. OPDC will consult on the proposed local list alongside the progression of the Local Plan prior to adoption. Any proposed change of use or redevelopment of the pub would be considered against Policy TCC7.
D6	The 3 existing pubs are buildings of historic character and could be locally listed buildings.	1	Historic England	Noted. These pubs are either locally listed, proposed to be locally listed or identified as a building of heritage value. OPDC will consult on the proposed local list alongside the progression of the Local Plan prior to adoption.

6. Design	Should use Surrey Quays as part of precedents work	1	Hammersmith and Fulham Historic Buildings Group	Noted. Although not included within OPDC's Precedent Study (2017), elements of Surrey Quays could be used to inform further precedent analysis as the area is continued to be developed.
6. Design	Support for canopies on shopfronts	1	1 Resident	Noted. Canopies would be considered on a case by case basis and are too detailed a consideration to set through a Local Plan.
D1	Concerns raised about the visualisations and precedents included in the Local Plan and that these do not promote an exemplary approach to design. Better precedent examples should be identified.	3	Old Oak Interim Forum, the Hammersmith Society, Midland Terrace Resident's Group, Historic England	Noted. OPDC's Precedent Study (2017) provides an updated range of precedents. The visualisations will be removed from the next draft Local Plan.
D1	Believe that good design is an important aspect of many of the Local Plan policies	1	Hammersmith and Fulham Historic Buildings Group	Noted. The Spatial Vision, narratives and policy SP9 set out OPDC's aspirations and guidance for delivering high quality design in Old Oak and Park Royal.
D2	Support for performance spaces in the public realm to help to promote activity and vibrancy	2	1 Resident, 1 business	Noted. Policy D2 requires the delivery of a multifunctional public realm. The policy's supporting text refers to recreation and social interactions which is considered to include performance spaces.
D3	Temporary and permanent allotments should be promoted	3	The Hammersmith Society, 2 Residents	Noted. Policy EU1 supports temporary and permanent local food growing.
D3	Should focus open space close to family housing to allow parents to socialise	1	Resident	Noted. Policies EU1 and D9 and the place policies provide guidance for the location of child play space and coordination with wider public open space.
D8	Need to ensure there is enough room for disabled people in the public realm	1	Resident	Noted. Policies SP9 and D3 require proposals to deliver development that is accessible and inclusive for all.

D3	There appears to be no requirement to provide playing pitches for team sports in the Local Plan	1	Diocese of London	Change proposed. Outdoor sports pitches are covered in the requirements for multi-functional open space and play space outlined in Policies SP7, D7 and EU1. Indoor sports facility requirements are outlined in Policy TCC6.
D3	Need to consider whether public open space is publicly adopted or commercially run and there are advantages and disadvantages to both approaches	1	Resident	Noted. Policy D2 provides guidance for ensuring public access to relevant public spaces that are privately owned.
D6	As part of future planning applications, appraisals of existing buildings should be undertaken to determine historic significance.	1	Old Oak Park (DP9)	No change proposed. Proposals will be expected to refer to the OPDC Heritage Strategy to inform their heritage statements. Further assessment of other buildings may be appropriate on a case by case basis.
D6	Support retention of heritage buildings	2	2 Residents	Noted. Heritage assets will be conserved and enhanced through the implementation of policies SP9, D8, London Plan policy 7.8 and NPPF paragraphs 126 to 141

7. Housing

Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H2 Housing supply; Page 159; Figure 77	Agreement that North Kensington Gate North Site and South Site can be completed in first five years	1	Aurora Developments Ltd (Quod)	Noted
H4 Affordable housing; Paragraph 7.42; Page 171	Option 4 should be adopted- negotiating an affordable housing target on a site-specific basis. This has the benefit of stimulating investment rather than hindering development	3	Boropex Holdings Limited (Montagu Evans); QPR (NQP Development Services); Fruition Properties (DP9)	Change proposed. The Local Plan includes a 50% affordable housing target subject to viability. This is because as opportunity areas Old Oak and Park Royal can make a significant contribution towards London's affordable housing need. OPDC will follow the threshold approach set out in the Draft Affordable Housing & Viability SPG and work with the GLA and Approved Providers to use affordable housing grant to increase the level of affordable housing towards the 50% target. This policy was adopted rather than a fixed percentage because viability work showed that a fixed percentage would have to be lower than the 35% threshold to be viable on sites with high benchmark land values, construction costs and infrastructure requirements.
H4 Affordable housing; Paragraph 7.39; Page 169	Option 1 should be adopted- minimum housing targets are essential to provide certainty for developers, backed up by viability testing and a review mechanism. Developers should	7	Brent Council; City and Docklands Property Group; GUA; Harlesden Neighbourhood Forum; Raban Management Ltd and Raban	Change proposed. The Local Plan has adopted a 50% affordable housing target subject to viability. Where viable schemes will be encouraged to exceed this target. OPDC will operate review mechanisms in line with mayoral guidance on schemes which do not meet the mayoral SPG threshold. This policy was adopted rather than a

	be encouraged to exceed targets		Goodhall Ltd; The Hammersmith Society; 1 resident	fixed percentage because viability work showed that a fixed percentage would have to be lower than the 35% threshold to be viable on sites with high benchmark land values, construction costs and infrastructure requirements.
H4 Affordable housing; General comment	Local people need to be able to access the new affordable housing	6	Brent Council; Midland Terrace Residents Group; 5 residents	No change proposed. London Affordable Rent will be subject to a nominations policy agreed between the OPDC and the boroughs outside of the Local Plan processes. This will seek to ensure that local people can access the affordable rented homes delivered as well as provide an opportunity for pan-London mobility.
H1 Strategic policy for housing; Page 156; General comment	The housing chapter should make reference to temporary accommodation and statutory housing needs	1	Brent Council	No change proposed. OPDC is not a local housing authority with statutory housing duties. However it is recognised that OPDC is helping councils to meet statutory housing need by facilitating the delivery of more affordable housing.
H1 Strategic policy for housing; Page 156; General comment	Reference should be made to the Housing and Planning Act 2016 and how the delivery of affordable housing will be maximised	3	Brent Council; Diocese of London; Midland Terrace Residents Group	Change proposed. The explanatory text in policy H2 makes reference to starter homes as a form of affordable home ownership housing. However, the Government has abandoned mandatory requirements to deliver 20% starter homes on every site. Rather, the Government intends to amend the NPPF to introduce a policy expectation that housing sites deliver a minimum of 10% affordable home ownership units. This may include a range of affordable home ownership products, including: starter homes, shared ownership and discount market sales homes. This approach would align with the Mayor's draft Affordable Housing and Viability SPG and OPDC's affordable housing mix will exceed this.

H1 Strategic policy for housing; Paragraph 7.5; Page 157	Text is missing from the final paragraph	1	Brent Council	Noted. This comment no longer applies as there is no strategic policy for housing (Policy H1 in the Regulation 18 draft) in the Reg 19 Local Plan.
H2 Housing supply; Figure 77; Page 159	Query about phasing on First Central site. It could deliver earlier in the plan period	2	Brent Council, Diageo Plc	Change proposed. The phasing has been amended to show the First Central site within the 0-5 year development phase.
H3 Housing mix; Paragraph 7.28; Page 164	It will be challenging to deliver family housing at high densities as the developers will favour 1 and 2 bed units	2	Brent Council; Midland Terrace Residents Group	Change proposed. Residential schemes will be expected to deliver 25% family units across all tenures including a SHMA compliant mix for London Affordable Rent (Policy H3). This approach is a balance between actual delivery of family homes in London and the high need for family housing identified in the SHMA. It also reflects the fact that Old Oak will be a high density development and large units will have to be designed appropriately so that they are suitable for families with children (Policy H4).
H4 Affordable housing; Page 168; General comment	Consider flexi-rent model where housing provision for individual sites can be reviewed and adjusted over time to optimise affordable housing provision	1	Brent Council	No change proposed. Review mechanisms will be applied to schemes that do not meet the threshold in order to ensure that affordable housing contributions are increased if viability improves over time.
H4 Affordable housing; Paragraph 7.36; Page 168	The Local Plan should commit to targets on the various types of affordable housing, e.g: affordable rent, shared ownership etc	4	Brent Council; The Hammersmith Society; Ealing Council; MP for Hammersmith	Change proposed. The Local Plan will set out requirements for London Affordable Rent housing and London Living Rent and shared ownership.
H4 Affordable housing; Page 168; General comment and paragraph 7.39; Page 169	Affordable housing policy will need to be reviewed to keep pace with supply and demand, particularly if option 1 is chosen and OPDC fixes a target	5	Brent Council; Diocese of London; Midland Terrace Residents Group; Old Oak	No change proposed. Review mechanisms will be applied to schemes that do not meet the threshold in order to ensure that affordable housing contributions are increased if viability improves over time as set out in the Mayor's

			Interim Forum; 1 resident	Draft Affordable Housing & Viability SPG. The Local Plan will be reviewed from time to time, including the affordable housing policies to ensure that they are keeping pace with housing supply and demand.
H6 Housing in the Private Rented Sector; Page 174; General comment	PRS should be located across the OPDC area and not concentrated in any particular location	4	Brent Council; GUA; Citrus Group & Greystar, Diageo Plc	Change proposed. Build to Rent will not be restricted to specific locations but Policy H6 provides specific guidance on Build to Rent developments, recognising that they differ to the traditional build for sale model.
H6 Housing in the private rented sector; Paragraph 7.55; Page 175	Support discounted market rent to include deposit saving options whereby the tenant and the developer pay into a savings scheme	3	Brent Council; 2 residents	Noted, but this is not really a planning issue. OPDC cannot justifiably make this a condition of development.
H4 Affordable housing; Page 168; General comment	Recognition that OPDC needs to deliver a mix of dwelling types and sizes	2	Citrus Group & Greystar; 1 resident	Noted
H3 Housing supply Figure 80; Page 165	There are other local evidence base documents that could be used to determine housing mix on specific schemes in addition to the draft SHMA	1	Citrus Group & Greystar	Noted. OPDC followed national guidance for determining a size mix based on housing need. However residential schemes will be expected to deliver 25% family units across all tenures including a SHMA compliant mix for London Affordable Rent. This approach is a balance between actual delivery of family homes in London and the high need for family housing identified in the SHMA. It also reflects the fact that Old Oak will be a high density development and large units will have to be designed appropriately so that they are suitable for families with children.

H4 Affordable housing; Paragraph 7.41; Page 170	Option 3 should be adopted- robust viability assessments are important in determining the appropriate level of affordable housing for each site. Otherwise development might be constrained	9	Citrus Group & Greystar; City and Docklands Group; Diageo Plc; Hammersmith & Fulham Council; Old Oak Interim Forum; Old Oak Park)D9); Essential Living; Fizzy Living; Fruition Properties (DP9)	Change proposed. OPDC will adopt an overall strategic target of 50% affordable housing, subject to viability. The policy will follow the threshold approach outlined in mayoral guidance. It will also take account of the complexity of unlocking development at Old Oak and the level of infrastructure required and viability will need to be assessed on a site by site basis.
H6 Housing in the private rented sector; Page 174; General comment	General support for policy on PRS housing	5	Citrus Group & Greystar; Diageo plc; Ealing Council; Fizzy Living; The Hammersmith Society	Noted
H6 Housing in the private rented sector; Paragraph 7.54; Page 174	Support for delivery of affordable housing contributions through discount market rent, possibly in perpetuity	3	Citrus Group & Greystar; Essential Living; 1 resident	Noted
H6 Housing in the private rented sector; Paragraph 7.55; Page 175; H4 Affordable Housing; Paragraph 7.37; Page 168	Discounted Market Rent should be subject to robust viability assessments as BTR homes generate lower values than standard market homes.	3	Citrus Group & Greystar, City and Docklands Property Group; Fizzy Living	Noted. Any build to rent proposal would be assessed in terms of viability, in accordance with Policy SP4 and H2.
H6 Housing in the private rented sector; Paragraph 7.57; Page 175	Support for policy option to require PRS developers to sign up to London Rental Standard	2	Citrus Group & Greystar; Fizzy Living	Noted

H2 Housing supply; Figure 77; Page 159	Agreement that the site at 9 Portal Way is identified for delivery in the first five years of the Local Plan period.	1	Citrus Group & Greystar	Noted
H3 Housing mix; Paragraphs 7.28 and 7.30; Page 166	Policy on housing mix should be implemented flexibly. Some sites may be suitable for micro living or co-living and others for family units	4	City and Docklands Group; Diageo Plc; Essential Living; Old Oak Park (DP9)	Change proposed. Residential schemes will be expected to delivery 25% family units across all tenures including a SHMA compliant mix for London Affordable Rent. This takes account of local SHMA need, pan London delivery rates, the nature of the development proposed at Old Oak and Park Royal and development viability and economics.
H2 Housing supply; Paragraph 7.19; Page 161	Support for the need to monitor the delivery of housing to ensure that it meets London's needs	1	Diocese of London	Noted
H2; Housing supply; Paragraph 7.20; Page 161	It is unlikely that a higher number of homes can be achieved within the Local Plan period	1	Diocese of London	Noted. However, OPDC will seek to exceed the number of homes delivered where this is appropriate to do so as there is a need for more housing.
H2; Housing supply; Paragraph 7.13; Page 161	Agreement with the approach taken on housing market areas and objectively assessed housing need in the SHMA	2	Diocese of London; Kensington and Chelsea Council	Noted
H2 Housing supply; Figure 77; Page 159	Query as to whether all of Old Oak North will be built out by 2021	1	Diocese of London	No change proposed. Old Oak North is shown within the 2022 to 2037 or 2037 phase. It is not assumed that this site will be built out by 2021.
H3 Housing mix; Paragraph 7.26; Page 166	Require developers to have pre-application meetings and to demonstrate how they propose to meet housing need	1	Diocese of London	Noted. OPDC's Statement of Community Involvement sets out the requirements for developers to undertake pre-application discussions with OPDC. As part of these

				discussions, OPDC would make developers aware of the area's housing needs.
H3 Housing Mix; Paragraph 7.30; Page 166; H4 Affordable housing; General comment	Oppose proposal that a proportion of housing does not have to meet the London Plan space standards	3	Diocese of London; GUA; Hammersmith & Fulham Disability Forum	No change proposed. Developers will be required to deliver 90% of units as Building Regulation M4(2) 'accessible and adaptable dwellings' and 10% of new housing as Building Regulation M4(3) 'wheelchair user dwellings' across all tenures, except where proposals are delivered in accordance with Policy H7- Purpose-built Co-Living and other housing with shared facilities. In all other circumstances developers will be required to meet the standards.
H4 Affordable housing; Paragraph 7.37; Page 168	Ensure that homes for sale are marketed in London/UK before they are marketed abroad	3	Diocese of London; 2 residents	Change proposed. OPDC will work with the Mayor and Homes for Londoners on measures to give priority to Londoners. This is reflected in policy H1- Housing Supply.
H4 Affordable housing; Page 168; General comment	Use viability assessments and reviews to ensure that development makes a fair contribution to affordable housing and argue for a larger affordable housing percentage when future increases in value occur	1	Diocese of London	Noted. OPDC will operate review mechanisms, as set out in Policy H2 and will use funding to maximise delivery towards the 50% strategic housing target.
H10 Student accommodation; Paragraph 7.79; Page 182	There should be no specific target for student housing unless this can be justified	1	Diocese of London	No change proposed. The SHMA has identified limited need for student housing compared to other housing types. However, provision of purpose built student accommodation will be supported as part of an overall balanced scheme offering standard self-contained accommodation provided that management plans are in place setting out how any impact on the surrounding

				area and the amenity of the neighbouring residents will be mitigated, particularly in relation to noise, disturbance and amenity impacts.
H10 Student accommodation; Paragraph 7.84; Page 182	Student housing should not compromise the delivery of housing to meet local need. Where it does, this should be restricted and only when it is for an academic institution	4	Brent Council; Diocese of London; GUA; Midland Terrace Residents Group	Noted. The SHMA has identified limited need for student housing compared to other housing types. However, as policy H10 states, OPDC recognises the positive benefits that students bring to London's economy and will support proposals for new student accommodation where it is part of an overall balanced scheme offering standard self-contained accommodation. This will help to achieve a mixed and balanced community.
H1 Strategic policy for housing; Page 156; General comment	Support for overall approach	1	Fizzy Living	Noted
H3 Housing Mix; Page 164; General comment	Support for overall approach of affordable housing mix, including rented and owned	4	Fizzy Living; GUA; Old Oak Interim Forum; 1 resident	Noted
H3 Housing Mix; Paragraph 7.25; Page 164	Flexibility is required in the operation of the housing mix policy to cater for Build to Rent schemes	1	Fizzy Living	Change proposed. Although there is a high need for family housing identified in the SHMA, smaller units may be appropriate in Build to Rent developments close to stations. This is reflected in the design requirements set out in Policy H6-Build to Rent.
H6 Housing in the Private Rented Sector; Key issues; Page 174	PRS can come from purpose built schemes held in single ownership which are intended for long term rental. The economics of such schemes	1	Fizzy Living	Noted. Any proposal for build to rent would be assessed having regard to viability considerations, in accordance with Policy SP4 and H2.

	differ from build to sale and should be determined on a case by case basis			
H6 Housing in the Private Rented Sector; Page 174	Lower financial returns mean that BTR providers cannot compete with traditional housebuilders in terms of land acquisition	1	Fizzy Living	Change proposed. A reliance on a revenue income through rent rather than upfront return on sales means that Build to Rent often cannot compete on an equal footing with speculative build for sale when competing for land, as it can have inherently lower returns. The new pathway outlined in the GLA's Affordable Housing and Viability SPG seeks to address this point. Any proposal for build to rent would be assessed having regard to viability considerations, in accordance with Policy SP4 and H2.
H6 Housing in the Private Rented Sector; Page 174	There is a potential conflict between providing affordable housing contributions on PRS schemes and providing rental homes in perpetuity because of the high land values	1	Fizzy Living	Change proposed. Subject to viability PRS schemes will be required to provide affordable housing in the form of intermediate rent, preferably London Living Rent. All homes on the Build to Rent development will have to stay under single management and as such OPDC will encourage affordable homes on the development to be managed by the Build to Rent provider (or possibly via another designated manager). This approach is set out in the draft Affordable Housing and Viability SPG.
H6 Housing in the Private Rented Sector; Page 174	Include policies to specify parcels of land that should be provided for BTR, to be secured through s106 agreements; and allow for the potential introduction of a new BTR use class, and identify sites that	1	Fizzy Living	No change proposed. OPDC supports BTR as part of a mix of housing types but considers it inappropriate to allocate specific sites for BTR as this approach would be too inflexible and could undermine the optimised sustainable development of the area.

	could only be occupied by this use class			
H6 Housing in the Private Rented Sector; Paragraph 7.54; Page 175/5	Support covenants for homes at below market rates as long as this formed part of a solution to provide units at Discounted Market Rent in lieu of other affordable housing for a fixed term (rather than in perpetuity)	3	Fizzy Living; Midland Terrace Residents Group; Old Oak Park DP9	No change proposed. Discount market rent housing, in the form of London Living Rent, in Build to Rent schemes will have to be in perpetuity in accordance with mayoral guidance. There will be no requirement to deliver other forms of affordable housing.
H2 Housing supply; Figure 77; Page 159	Support for development at Scrubs Lane	1	Fruition Properties (DP9)	Noted
H3 Housing Mix; Paragraph 7.25; Page 164	Development should be focused on smaller units rather than 3+ beds to support the new jobs that are created, maximise the number of homes delivered and improve viability	1	Fruition Properties (DP9)	Change proposed. Residential schemes will be expected to deliver 25% family units across all tenures including a SHMA compliant mix for London Affordable Rent. This approach is a balance between actual delivery of family homes in London and the high need for family housing identified in the SHMA. It also reflects the fact that Old Oak will be a high density development and large units will have to be designed appropriately so that they are suitable for families with children.
H1/2 Strategic policy and Housing supply; Paragraphs 7.3 & 7.13; Page 157 & 160	Need to ensure that the Local Plan explains that OPDC will help to play a critical role in meeting London's strategic needs as well as the needs of the local housing market area	2	GLA; Home Builders Federation	Change proposed. Policy H1 contains a figure explaining how OPDC will meet local objectively assessed housing need within the red line boundary but will also meet need in Brent, Ealing and Hammersmith and Fulham as well as London-wide.

H4 Affordable housing; Paragraphs 7.39 & 7.40; Pages 169 & 170	Given the size of the OPDC area and the range of sites it is likely that a hybrid of option one and two would be most effective in delivering affordable housing	1	GLA	Change proposed. OPDC has adopted a 50% target subject to viability. OPDC will also follow the threshold approach to assessing planning applications in accordance with mayoral guidance.
H8 Specialist Housing; Page 178	Remove references to Lifetime Homes and the London Access Forum. This has been replaced by the Strategic Access Panel	1	GLA	Change proposed. The references to Lifetime Homes and the London Access Panel have been removed.
H3 Housing Mix; Paragraph 7.30; Page 166	New housing built on TLF and OPDC land should exceed Building Regulation M4(2) and M4(3) but there could be flexibility on change of use n accordance with the London Plan	1	GLA	Noted. This was an alternative policy option. It is not been taken forward. In accordance with the London Plan 90% will have to be Building Regulation M4(2) 'accessible and adaptable dwellings' and 10% of new housing as Building Regulation M4(3) 'wheelchair user dwellings' across all tenures, except where proposals are delivered in accordance with Policy H7- Purpose-built Co-Living and other housing with shared facilities.
H10 Student accommodation; Paragraph 7.82; Page 183	New purpose build student accommodation should meet London Plan requirements on design and accessibility and a proportion should be affordable	4	GUA; GLA; Hammersmith & Fulham Disability Forum; Resident	No change proposed. The London Plan requirement for affordable student accommodation will apply when a provider of student accommodation does not have an undertaking with a specified academic institution(s) that specifies that the accommodation will be occupied by students of that institution(s). Proposals for student accommodation will be required to be of high quality in relation to design and size. The access standards do not apply to specialist forms of housing which are not in the C3 use class such as student housing, care homes and homes in multiple occupation in accordance with the London Plan.

H4 Affordable housing; General comment; Page 168	Concerns about homelessness and whether the housing developed will be genuinely affordable	2	GUA; MP for Hammersmith	Noted. OPDC will seek to maximise the provision of affordable housing in accordance with Policy H2 and mayoral guidance.
H4 Affordable housing; General comment; Page 168	Concerns about requirements to deliver starter homes and the impact on the delivery of rented homes that are affordable to people affected by the benefit cap	3	GUA; Midland Terrace Residents Group; Old Oak Interim Forum	No change proposed. The Government has abandoned the mandatory requirement for Starter Homes on all new sites as set out in the Housing and Planning Act 2016. Rather, the Government intends to amend the NPPF to introduce a policy expectation that housing sites deliver a minimum of 10% affordable home ownership units. This may include a range of affordable home ownership products, including: Starter Homes, shared ownership and discount market sales homes. This approach would align with the Mayor's draft Affordable Housing and Viability SPG and the proposals set out in this Local Plan.
H4 Affordable housing; General comment; Page 168	Develop evidence base on how to deliver genuinely affordable housing on public sector land	1	GUA	Noted. OPDC Is developing an affordable housing delivery strategy. This will include encouraging developers in existing applications to engage with an Approved Provider at the earliest stage; working with Approved Providers and Homes for Londoners to maximise public investment in affordable housing at Old Oak; working with the GLA's Affordable Housing Viability Team to assess development viability of schemes; and developing an affordable homes programme. This will help OPDC to maximise the overall delivery of affordable housing and help the Major to achieve his housing ambitions. Through this work OPDC will develop an evidence base to support delivery.

H1 Strategic policy for housing; Paragraph 7.3; Page 156	Address local need within the three participating boroughs before providing housing for wider London needs	1	GUA	No change proposed. The total need identified across the whole of the OPDC SHMA area (99,000) is likely to be exceeded by a combination of OPDC delivery plus the London Boroughs of Brent, Ealing and Hammersmith & Fulham meeting their respective London Plan housing delivery targets over the next 20 years. Delivery at OPDC can therefore also make a contribution towards meeting strategic London needs.
H2 Housing supply; General comment; Page 158	Concerns around the capacity to deliver the new homes	4	GUA; Midland Terrace Residents Group; Old Oak Interim Forum	No change proposed. The Development Capacity Study (DCS) was a key piece of the evidence base for the development of OPDC's Local Plan. This identified that approximately 22,350 new homes can be delivered on land in Old Oak and Park Royal Opportunity Areas during the 20 year Local Plan period.
H4 Affordable housing; Paragraph 7.37; Page 168	Operate an open book policy when giving pre-application advice to developers	1	GUA	Noted. OPDC offers a pre-application advice service. Pre-application advice is generally confidential until a planning application is submitted. However, any advice given is without prejudice to future decisions of OPDC. Where appropriate, external consultees may be asked for their comments on proposals at pre-application stage. This is set out in OPDC's Statement of Community Involvement.
H4 Affordable housing; General comment; Page 169	Affordable and intermediate homes should meet the space standards	1	GUA	Noted. Affordable rented and intermediate homes will meet the London and now national described space standards. In accordance with Policy H3, OPDC will require that 90% of new homes are designed to be accessible and adaptable and that 10% are fully equipped or adaptable for wheelchair users, in accordance with the Building Regulations. This will ensure that homes are

				flexible enough for people to grow older. This will be provided across tenures.
H6 Housing in the Private Rented Sector; Paragraph 7.54; Page 174	Specify that new purpose build private rented accommodation is accessible and inclusive	1	GUA	Noted. Policy D3 requires all buildings to be accessible and inclusive for all. As detailed in policy H3 OPDC will require that 90% of new homes are designed to be accessible and adaptable and that 10% are fully equipped or adaptable for wheelchair users, in accordance with the Building Regulations. This will ensure that homes are flexible enough for people to grow older. This will include homes in the purpose-build PRS/Build to Rent sector.
H6 Housing in the private rented sector; Paragraph 7.53; Page 174	PRS can create transient community in poor quality, insecure and expensive housing	4	GUA; 3 residents	No Change proposed. All homes within a Build to Rent development or block will need to stay under single ownership and management under a covenant of at least 15 years, meaning that individual units cannot be separately sold on and overall ownership the scheme can only change if the scheme stays as Build to Rent. This will ensure a commitment to invest in place-making and will provide better management standards and higher quality homes than much of the mainstream private rented sector. Build to Rent developments will also be required to provide affordable housing in the form of London Living Rent and also offer longer-term tenancies.
H9 Gypsy & Traveller accommodation; General comment; Page 180	Concerns that the new planning policy definitions will mean need for pitches is not met	3	GUA; London Gypsy & Traveller Unit; Kensington & Chelsea Council	No change proposed. The Local Plan has to be developed in accordance with the national policy guidance in operation at the time or it may not be passed by the Planning Inspector. The SHMA has taken account of the Traveller households who do not meet the new planning policy

				definitions. They constitute 0.01% of the overall housing need in the area.
H9 Gypsy & Traveller accommodation; General comment	Concerns about consultation and engagement on GTNA	1	GUA; London Gypsy & Traveller Unit	No change proposed. To be consistent with the guidance set out in national planning policy for Traveller Sites, the GTNA consultants undertook site surveys and a stakeholder engagement programme including interviews with members of the Travelling Community and other stakeholders who come into contact with members of the Travelling Community. Through the site surveys and interviews data on needs was collected for households living on 16 of the 24 existing pitches. There were no refusals to be interviewed and repeated attempts were made to complete interviews with the remaining 8 pitches but they were not successful. In addition the consultants attempted to make contact with "bricks and mortar" Travelling Community families by asking residents that were interviewed if they knew of any friends or family who were looking to move to a site and through the stakeholder interviews. However, as a result of this no additional households were identified to be interviewed.
H9 Gypsy & Traveller accommodation; Paragraph 7.72; Page 180	Bashley Road site is in need of updating and is poorly situated. Regeneration is an opportunity to reprovide it	4	GUA; Ealing Council; London Gypsy & Traveller Unit; MP for Hammersmith	No change proposed. OPDC will work with the London Borough of Ealing to protect, safeguard and improve the existing site so that it continues to provide suitable accommodation for the households who live there. This is reflected in Policy H8.

H4 Affordable housing; General comment; Page 166	Housing is required for key workers who are going to serve the new population	2	Diocese of London; GUA	No change proposed. The high cost of renting and buying a home impacts on the range of households who can afford to live and work in the OPDC area, including key workers. The Local Plan includes a 50% affordable housing target and that 70% of the affordable housing should be intermediate tenures such as London Living Rent and Shared Ownership. This will help key workers to be able to afford a property to rent or buy in the local area.
H3 Housing Mix, Paragraph 7.29; Page 166	Support for policy requirements on accessible and adaptable homes, particularly for wheelchair users	3	Hammersmith & Fulham Disability Forum; 2 residents	Noted
H3 Housing Mix, Paragraph 7.29; Page 166	Recommendation that the Local Plan requires applicants to justify any proposals not to include a lift	1	Hammersmith & Fulham Disability Forum	No change proposed. Residential developments will be required to meet the Government's nationally and regionally described space standards in accordance with Policy H3. This includes the arrival at a building and the design of shared circulation and any required lift access.
H3 Housing Mix, Paragraph 7.29; Page 166	OPDC should work with the boroughs and disability groups to ensure that wheelchair users occupy the wheelchair units when built out	2	Hammersmith & Fulham Disability Forum; 1 resident	The Planning Practice Guidance states that Local Plan policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (generally this will be social and affordable rented units). This means that market units can only be required to meet the standards for wheelchair adaptable homes. In this context OPDC will develop a protocol with the boroughs to match wheelchair users with wheelchair affordable units. There is little that OPDC can do for private sale wheelchair homes other than to require

				developers to market them as such to potential buyers.
H3 Housing Mix, Paragraph 7.29; Page 166	Wheelchair adaptable units should have adequate turning circle space	1	Hammersmith & Fulham Disability Forum	Noted. M4(3) is divided into two categories; 'wheelchair accessible' (a home readily useable by a wheelchair user at the point of completion) and 'wheelchair adaptable' (a home that can be easily adapted to meet the needs of a household including wheelchair users). These units will be designed as having adequate turning circles.
H3 Housing Mix, Paragraph 7.29; Page 167	Private sale wheelchair units should be marketed and sold as such for the lifetime of the scheme	1	Hammersmith & Fulham Disability Forum	No change proposed. OPDC cannot realistically control how market wheelchair units are marketed or sold beyond the first sale as it will be the subsequent owner's responsibility to administer any resale. However, for the first sale OPDC will work with the developer to ensure that the unit is marketed as a wheelchair unit to encourage wheelchair users to purchase.
H4 Affordable housing; General comment; Page 168	There is not enough information to determine which option would optimise the delivery of affordable homes accessible for disabled people	1	Hammersmith & Fulham Disability Forum	Noted. The Local Plan proposes 50% affordable housing target subject to viability (Option 3 of Reg 18 Local Plan). 90% of units will be accessible and adaptable dwellings in accordance with policy H3.
H5 Existing housing; General comment; Page 172	Recommendation to adopt similar approach to LBH&F on extensions and conversions and comply with Building Regulations	1	Hammersmith & Fulham Disability Forum	Change proposed. The explanatory text in policy H5 now states that where it is practical, conversions would aim to meet the Building Regulations to increase the supply of accessible and adaptable dwellings.
H5 Existing housing, Page 172	Take account of the move towards step down beds for people leaving health care settings	1	Hammersmith & Fulham Disability Forum	Noted. The Step Down Beds Scheme is a way of enabling people to leave hospital by moving to and being specially cared for in a residential care home bed. To be supported through this scheme people must be medically stable and be unlikely

				to benefit from further time in hospital, but unable to go straight home. Residential care homes are included in policy H9 as a form of specialist housing that will be supported.
H4 Affordable housing; Policy options; Page 168	There is a high need for affordable housing in the area therefore affordable housing delivery should be maximised	9	GUA; Hammersmith & Fulham Friends of the Earth; Ealing Council; Midland Terrace Residents Group; MP for Hammersmith; Old Oak Interim Forum; 5 residents	Change proposed. OPDC's SHMA identifies a high need for affordable housing. The London Mayor has set his long-term ambition that half of all homes should be affordable. This is why OPDC has set a 50% affordable housing target, subject to viability. In accordance with the draft Affordable Housing & Viability SPG, OPDC will apply the threshold approach.
Housing supply; General comment	Concern about the impact of a high density scheme on the existing housing and environment	2	Hammersmith & Fulham Friends of the Earth; The Hammersmith Society	No change proposed. Delivering a high quality and well-designed built environment for both the industrial Park Royal and the new Old Oak is fundamental to successful place-making. It is also critical to long-term sustainability, and resilience and ensuring Old Oak and Park Royal are fully integrated into surrounding existing neighbourhoods.
H8 Specialist Housing; General comment; Page 178	Support creation of more mixed community including specialist options	2	Hammersmith United Charities; The Hammersmith Society	Noted.
H8 Specialist Housing; General comment; Page 178	There is a need for more housing for older people or people with support needs, for example at ground-floor level, sheltered, extra care and supported living	5	Hammersmith United Charities; 4 residents	Noted. A range of housing typologies may be suitable for older people as described in the justification text of Policy H9- Specialist Housing.

H4 Affordable housing; General comment; Page 168	Housing for older people has to be affordable	1	Hammersmith United Charities	No change proposed. Policy H2 (affordable housing) will apply on residential schemes providing specialist housing units for older people.
H8 Specialist Housing; Page 178	Require proposals to be of an appropriate mix of sizes and range of options	1	Hammersmith United Charities	No change proposed. A range of housing typologies may be suitable for older people as described in the justification text of policy H9-Specialist Housing.
H2 Housing supply; Key issues; Page 158	Confirm the number of homes to be delivered in the OPDC Local Plan period and how this relates to the 25,500 identified in the London Plan	2	Home Builders Federation; Kensington and Chelsea Council	Noted. OPDC's Development Capacity Study identifies that approximately 22,350 homes can be delivered in the plan period, based on assessments of allocated sites.
H2 Housing supply; Policy context; Page 158	Cross borough issues in the wider southeast need to be considered	1	Home Builders Federation	No change proposed. In accordance with the Duty to Cooperate, OPDC has been engaging with neighbouring local authorities. OPDC has been working closely with the GLA on its production of the GLA SHLAA, which is involving the wider south-east authorities and is considering wider housing delivery issues, in accordance with the Duty to Cooperate.
H2 Housing supply; Page 158; General comment	Concern about the double counting of completions within the areas	1	Home Builders Federation	No change proposed. OPDC is the planning authority for the area and will monitor housing completions in the area. London Boroughs of Brent, Ealing and Hammersmith & Fulham will monitor housing completions for the areas where they are the planning authority, There will be no double counting of outputs.
SHMA; Paragraph 6.40; Page 75	How does the OPDC housing target relate to the London Plan targets for the 3 boroughs?	1	Home Builders Federation	Noted. The borough housing targets identified in the London Plan were arrived at using the 2013 London Strategic Housing Land Availability Assessment (SHLAA). At the time this was produced, Old Oak was identified as a Strategic Industrial Location (SIL) and a limited capacity for

				housing was identified in the area. In the next London Plan OPDC will have its own housing target and is feeding into the updated SHLAA.
SHMA; Paragraph 6.37; Page 74	Why does the OAN in the OPDC SHMA not match the total sum of the housing targets in the London Plan for the three boroughs	1	Home Builders Federation	No change proposed. Objectively assessed need is based on housing need as identified through a Strategic Housing Market Assessment. Housing targets are based on land capacity as identified through a Strategic Land Availability Assessment. However, projecting forward, the total need identified in the OPDC SHMA can be exceeded by a combination of OPDC delivery of homes plus the London Boroughs of Brent, Ealing and Hammersmith & Fulham meeting their respective London Plan housing delivery targets over the next 20 years.
H1 Strategic policies; General point	OPDC should require the 3 authorities to bring forward Local Plans to cover 2017 to 2037 under the duty to cooperate	1	Home Builders Federation	No change proposed. In accordance with the Duty to Cooperate, OPDC has bi-weekly meetings with neighbouring boroughs. It does not have the power to require the local authorities to bring forward local plans that follow the same timeframe as OPDC's Local Plan.
H10 Student accommodation; General comment	Confirm whether a student bed-space is a dwelling completion for the purposes of its housing target	1	Home Builders Federation	Noted. Household spaces in non self-contained (NSC) accommodation count towards the London Plan's overall housing targets. NSC can include student accommodation, specialist accommodation for older people, nurses' hostels and shared housing for other groups (including vulnerable or disabled people), and houses in multiple occupation.
H10 Student accommodation; Paragraph 7.79; Page 183	Objection to "over-concentration"- what does it mean and how will it be measured?	1	Imperial College London	No change proposed. OPDC recognises the many positive benefits that universities and their students can bring to an area. In policy H10, OPDC aims to avoid potentially adverse issues of

				not achieving a balanced mix and variety of housing of all forms in any one location. This will be achieved by monitoring the range of housing being delivered in the places identified in the places policies.
H10 Student accommodation; Paragraph 7.79; Page 182	Support for student accommodation where it is meeting an identified need and is part of a balanced community	5	Imperial College London; Old Oak Park (DP9); The Hammersmith Society; Home Builders Federation, 1 resident	Noted. This is set out in the policy H10 on student accommodation.
H4 Affordable housing; Page 168; General comment	As landowner OPDC can maximise delivery of affordable housing	1	Ealing Council	Noted. OPDC is developing an affordable housing delivery strategy. OPDC will produce a detailed programme based on sites where there are current planning applications and pre-applications, sites identified for housing which are owned by the public sector including Approved Providers where vacant possession can be obtained within 5 years and other sites in private ownership with the potential for early redevelopment for housing and where there could be interest from landowners in bringing forward sites. This will be monitored to maximise delivery through grant and other means.
H5 Existing housing; General comment; Page 172	Housing delivery in areas of Strategic Industrial Location should not constrain industrial uses (London Plan 2.17)	1	Ealing Council	Noted. Areas identified as SIL provide employment opportunities for local people and development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities.
H8 Specialist Housing; General comment; Page 178	There should be a mix of housing types to ensure a social mix	2	Ealing Council; 1 resident	Noted. Policy H3 sets out the housing size mix requirements. Policy H2 sets out the affordable housing types to be provided which will include housing at target rent levels (London Affordable Rent) as well as intermediate housing (Shared

				Ownership and/or London Living Rent) for households on moderate incomes who cannot afford market housing. This will ensure that there is a mix of incomes, tenures and unit sizes as part of a balanced community that meets a range of needs.
H1 Strategic policy for housing; General comment; Page 156	There should be a requirement for high standards of sustainability performance	1	Hammersmith & Fulham Council	Noted. The Environment and utility policies set out how the development will be sustainable, for example: how it can help to deliver a high quality microclimate, which receives adequate sunlight and daylight, has a good quality of air, low levels of noise, good quality soil and water and that development avoids overheating. Development and growth is often viewed as a key risk to climate change, but if well designed, delivered and operated, it can also be a key part of the response.
H4 Affordable housing; General comment; Page 168	OPDC should work closely with the other boroughs to maximise delivery	1	Hammersmith & Fulham Council	Noted. OPDC is developing an affordable housing delivery strategy. This will set out how OPDC will work with local authorities, developers, Approved Providers and the GLA to maximise the provision of affordable housing within Old Oak and Park Royal.
H9 Gypsy & Traveller accommodation; Page 180	Recommend working with Kensington & Chelsea on any new site provision	1	Hammersmith & Fulham Council	Noted. Under the Duty to Cooperate 0PDC will work with all neighbouring authorities on any new site provision.
H2 Housing supply; Figure 77; Page 159	Development should start around existing established residential areas (e.g.: New Place & Canalside Quarter proposals)	2	Midland Terrace Residents Group; Old Oak Interim Forum	Noted. Phasing is based on the deliverability and developability of sites, in accordance with national policy guidance.

H2 Housing supply; Figure 77; Page 159	Local plan could cover a shorter time period as some sites will not come forward for development until 2026 (e.g.: Old Oak South)	2	Midland Terrace Residents Group; Old Oak Interim Forum	No change proposed. The NPPF states that planning authorities should consider their Local Plans in minimum 15 year periods. Given the scale of development at OPDC it was considered more appropriate to look at development over 20 years. This aligns with the London Plan. The Local Plan will be reviewed at regular intervals to ensure that it is still fit for purpose. The Government's Housing White Paper suggests that this should take place at least once every five years.
H5 Existing housing; Page 172; General comment	Preferred policy on optimising and retaining the existing housing stock in the OPDC area is supported	2	Midland Terrace Residents Group; The Hammersmith Society	Noted
H6 Housing in the Private Rented Sector; Paragraph 7.57; Page 175	There should not be a mandatory requirement for PRS proposals to sign up to London Rental scheme as self-management can be just as effective	1	Midland Terrace Residents Group	No change proposed. OPDC will follow the requirements set out for build to rent set out in the draft Affordable Housing and Viability SPG to ensure consistent management standards across the sector.
	Produce a development viability protocol such as Islington Council's to ensure open and transparent negotiation	1	MP for Hammersmith	Noted. OPDC will follow the requirements set out in mayoral guidance. This closely follows the requirements set out in the London Borough Viability Protocol set up in collaboration with Islington Council and others. OPDC will also work with the GLA's newly set-up viability team to assess the financial viability of residential developments.
H4 Affordable housing; Policy options; Page 168	There should be a specific commitment on providing "social" housing rather than "affordable" rent	5	MP for Hammersmith; 4 residents	Noted. OPDC will follow the requirements set out in mayoral guidance and the Homes for Londoners funding guidance for London Affordable Rent as the Mayor's preferred low-

				cost rent product and is based on target rents. This is referenced in policy H3.
H4 Affordable housing, Figure 80; Page 165	Relationship between OAN of OPDC area and 24,000 homes at Old Oak in London Plan annex needs to be explained	1	Old Oak Interim Forum	Change proposed. Policy H1 has been amended to better explain the relationship between the different levels of housing need- existing population, OPDC boroughs and London. The 24,000 homes figure for Old Oak is based on the development capacity of the opportunity area, as expressed in the London Plan.
	Absorb existing housing in the pipeline before deciding on new schemes	1	Old Oak Interim Forum	Noted. The phasing plan includes schemes already in the development pipeline within early development phases.
	OAN has not been derived from the existing population in Old Oak	1	Old Oak Interim Forum	No change proposed. The existing resident population was the starting point for the SHMA but as it is very small a wider area including the whole boroughs of Brent, Ealing and Hammersmith & Fulham has determined OPDC's housing need. The area can also help meet London's strategic housing need.
	SHMAs are just one methodology in which to assess objectively assessed need. Other issues include homelessness and will need to be considered in determining a housing strategy for OPDC	1	Old Oak Interim Forum	Noted. SHMAs are the established methodology for determining objectively assessed housing need. The SHMA does consider homeless households and other unmet meets such as overcrowding and hidden households to determine affordable housing need.
	Concerns about the impact of the new homes on the existing congested road network	1	Old Oak Interim Forum	No change proposed. The impacts of development on the transport network have been modelled through the Old Oak Strategic Transport Modelling Study and the Park Royal Transport Strategy. Required mitigation

				measures have been identified and embedded into the Local Plan and Infrastructure Delivery Plan (IDP).
H10 Student accommodation; Paragraph 7.82; Page 183	Further explanation is required on why student housing should have to make an affordable housing contribution	1	Old Oak Park (DP9)	Noted. The requirement for affordable housing is in accordance with the GLA's 2016 Housing SPG. It is only required on developments that are not linked to an educational institution.
H6 Housing in the private rented sector; Paragraph 7.54; Paragraph 174	Onsite affordable PRS provision should not hinder institutional investors or prevent integrated design and management	1	Old Oak Park (DP9)	Noted. Policy H6 has been drafted in accordance with mayoral guidance, which has been developed in consultation with build to rent providers. This provides a pathway for providers such as institutional investors and reflects the distinctive economics of build for rent compared to build for sale. It requires high quality design, unified ownership and professional on-site management.
H3 Housing mix; Paragraph 7.26; Page 166	53% affordable units as family sized units is too high and inconsistent with the boroughs local plans and the London Plan	1	Old Oak Park (DP9)	Change proposed. The SHMA indicates that there is a high need for family housing across all tenures. OPDC has also taken into account the design and nature of the proposed development and development viability. Policy H3 sets out that 25% of all units are family-sized, i.e.: 3 bed plus. Within this, to assist the local authorities in providing accommodation to families on housing waiting lists, London Affordable Rent should reflect the SHMA bed size requirements.
H1 Strategic policy for housing and H2 Housing supply	Broadly supportive of plans to promote the delivery of a range of housing to meet different needs	2	Old Oak Park (DP9); QPR (NQP Development Services)	Noted

H2 Housing supply Figure 77 Phasing; Page 159; call for sites	The Boden House site can be developed in the first phase (2017 to 2021) as there are no constraints on delivery and should be included in Development Capacity Study it can provide a significant quantum of housing	1	Osbourne Investments Ltd (Boden House) (Savills)	Change proposed. The Boden House site has been included within the revised version of the Development Capacity Study.
H2 Housing supply; Figure 77 Phasing; Page 159;	Site should be classified as an existing residential area in figure 77 and included in Development Capacity Study	1	Raban Management Ltd and Raban Goodhall Ltd	Change proposed. The site has been identified as existing residential in the revised images.
H4 Affordable housing, general comment	The level of affordable housing should be less than 40% because of the high overhead costs of delivering the sites in the area	1	Raban Management Ltd and Raban Goodhall Ltd	No change proposed. There is a high need for affordable housing in London and in the OPDC local authorities. The Mayor has set a long-term ambition that half of all homes built in London should be affordable. As a Mayoral Development Corporation with a large capacity for new homes, policy H2 sets out an overall affordable housing target of 50%, subject to site viability. Within this context, OPDC will support the threshold approach adopted in the draft Affordable Housing & Viability SPG and work with developers, Approved Providers and the GLA to maximise provision of affordable housing. This will be measured in habitable rooms.
H2 Housing supply; Figure 77; Page 159	The North Pole site and the Kensal Canalside OA in RBKC will need to be considered carefully so the development of one site will not adversely affect the other	1	Kensington and Chelsea Council	Noted. OPDC will work with the Royal Borough of Kensington and Chelsea through the Duty to Cooperate to ensure that the North Pole and Kensal Canalside sites are developed appropriately.

H9 Gypsy and traveller accommodation, GTNA General comment	The RBKC and LBHF Joint SHMA needs to be acknowledged which identifies a need for 10 pitches across the two authorities over the next 10 years	1	Kensington and Chelsea Council	Noted. OPDC carried out a Gypsy & Traveller Accommodation Assessment of the existing population in the OPDC area which identified that there is no current need for additional pitches according to the planning definition. OPDC will work with the local authorities to identify future needs when these arise.
H2 Housing supply; Figure 77; Page 159	Further discussions suggested on how to bring forward housing development on Victoria Road and Westway sites	1	SEGRO	No change proposed. OPDC welcomes the opportunity to discuss development potential for the sites.
H2 Housing supply; Figure 77; Page 159	The map does not show all the land at the Western edge of the Origin site	1	SEGRO	Change proposed. Maps have been updated.
H3 Housing mix; Paragraph 7.26; Page 166	There is a need for more family housing across all tenures	3	The Hammersmith Society; 2 residents	Change proposed. The SHMA indicates that there is a high need for family housing in both the market and affordable sectors. Policy H3 sets out that 25% of all units are family-sized, i.e.: 3 bed plus. Policy H4 sets out specific design requirements for family housing to ensure that they are appropriate for families with children.
H2 Housing Supply; General comment	Concerns about quantum and quality of housing in a high density scheme	1	The Hammersmith Society	Noted. OPDC has produced a Development Capacity Study, which has assessed the capacity for new homes across Old Oak and Park Royal. Delivering a high quality and well-designed built environment is critical to their success as places where people will want to live. This is why OPDC has developed Policies on public realm, inclusive design, well-designed buildings, tall buildings, amenity and playspace to ensure that high quality design can help improve resident's physical, mental and emotional health and well-being. In addition to high quality design, OPDC

				will work with physical and social infrastructure providers to ensure that there are appropriate services in place.
H9 Gypsy and traveller accommodation; General comment	Identifying a site for additional gypsy and traveller accommodation is difficult	1	The Hammersmith Society	Noted. OPDC carried out a Gypsy & Traveller Accommodation Assessment which identified that there is no current need for additional pitches according to the planning definitions. OPDC proposes to continue to protect the existing Bashley Road site in Park Royal. OPDC will work with the other local authorities where an additional need is identified in the future.
H2 Housing supply Figure 77 Phasing; Page 159; call for sites	The site at 8-10 Pembroke Buildings, Scrubs Lane can be delivered in first 5 years	1	Westkite Limited	No change proposed. To optimise development, comprehensive redevelopment of the Cumberland Business Park is considered to be required. Given the complexity of ownerships within the Park, OPDC considers that comprehensive redevelopment is unlikely to take place in the first five years of the plan period.
H5 Existing housing; Paragraph 7.46; Page 172	OPDC should work with the local authorities to bring empty properties back into use	1	Resident	No change proposed. Working with the local authorities to bring empty residential properties back into habitable use is referred to in policy H5 on existing housing.
H3 Housing Mix; Paragraph 7.29; Page 166	The priority should be delivering affordable housing even if it does not meet the space standards	1	Resident	No change proposed. It is important that affordable housing meets the space standards as this contributes towards the health and wellbeing of residents.
H8 Specialist Housing; General comment; Page 178	1 bed units are often marketed for singles (e.g.: at Olympic Village) but they may be more suitable for older people	1	1 resident	Noted. OPDC will work with developers to ensure that units are marketed appropriately.

H3 Housing Mix; General comment; Page 164	Houseboats are an affordable alternative to bricks and mortar	1	1 resident	Noted. The Grand Union Canal Place Policy recognises that moorings for houseboats play an important role in supporting the historic canalside character of the area and in meeting housing need.
H1 Strategic Policy for housing	Provide a policy on self-build in accordance with legislation	3	3 residents	Noted. There is a section on self-build in policy H1. OPDC is not required to keep a register but will work with Brent, Ealing and Hammersmith & Fulham to ensure that the area is meeting the needs of people wishing to build their own home.
H3 Housing Mix; General comment; Page 164	Houses should be built as well as flats as they are more suitable for families	2	2 residents	No change proposed. Given the density of the development proposed at Old Oak and the need to provide at least 25,500 homes to meet London Plan targets, flatted developments are expected to be delivered. However there may be some potential for maisonette/duplex type development on lower floors. Policy H4 details how family housing will be appropriately designed and located in this context.
H7 Housing with shared facilities; Paragraph 7.60; Page 164	Co-living can meet a housing need, including for students	2	2 residents	Noted. OPDC will consider applications for co-living in accordance with policy H7 in locations where there is an identified need and where there are not unacceptable impacts on the amenity of other residents.
H5 Existing housing, Paragraph 7.45; Page 172	Concern about displacement of existing residents if homes are not replaced on a like-for-like basis	2	GUA; 1 resident	Noted. There is not expected to be any displacement as the development plans do not include estate clearance requiring the decanting of existing residents. Existing housing is also protected in policy H5.
7. Housing	The Local Plan should include policies that prevent people 'buying to leave'	1	Resident	Change proposed. Policy H1 states that OPDC will work with developers to ensure that wherever possible homes are marketed to and occupied by Londoners. OPDC will work with the Mayor and the Homes for Londoners Board to develop

				further measures to prevent people "buying to leave".
7. Housing, Policy H3	There needs to be a high amount of family housing as people in London tend to have to move out of London if they want a family.	2	Residents	Change proposed. The SHMA indicates that there is a high need for family housing across tenures. In general in London, about 20% of all units are being delivered as family housing. Policy H3 sets out that 25% of all units are family-sized, i.e.: 3 bed plus. This is a balanced approach taking account of the high need for family housing plus the viability of delivering such house in a dense urban environment. Policy H4 sets out specific design requirements for family housing to ensure that they are appropriate for families with children.
7. Housing	When planning for housing should look to locate student housing close to universities and family housing close to schools	1	Resident	Noted. The Local Plan aims to achieve a mix of housing types in appropriate locations to meet a range of housing needs. Student accommodation should be located in or close to transport nodes so that students can easily access public transport, workplaces and services. Family housing will be appropriately located to ensure that it is suitable for families with children to live in, in locations with easy access to public open amenity space that is suitable for sports and games activities for children of all age groups and be located in walking distance of other social infrastructure such as schools and childcare providers.
7. Housing, Policy H8	The population is ageing and OPDC should look to provide more housing for older people. Older people can help with	1	Resident	Noted. The SHMA indicates that there is a need for over 8,000 specialist housing units for older people. Policy H9 provides for 10% of residential developments with 1,000 or more units to be

	creating a sense of community and making the place feel safer			specialist housing to meet this need and provide the scale necessary for the delivery of the associated services. Units provided under this policy will be in addition to the requirements for M4(3)units set out in Policy H3 on housing mix.
7. Housing, Policy H4	OPDC should aim for as high a percentage of affordable housing a possible	2	2 Residents	Change proposed. OPDC has set an overall target to deliver 50% affordable housing target subject to viability. This level of affordable housing will not be achievable on every site but OPDC will work with developers and Registered providers to maximise delivery towards this target, subject to viability, including through the use of affordable housing grant.

8. Employment

Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
Employment	Employment is not an area HFHBP have expertise in.		Hammersmith and Fulham Historic Buildings Group	Noted.
Employment, E1	OPDC should have regard to LEP Jobs and Growth Plan, which highlights the opportunity for clusters of creative, tech and digital industries in Park Royal.		London Borough of Brent	Noted. The approach in the Local Plan does include specific policies aligned to the LEP's priorities including protecting employment growth (E1), encouraging future growth across a number of sectors (E2), supporting smaller businesses (E3), and facilitating infrastructure delivery (see chapter on Delivery and Implementation). The Park Royal Atlas, OPDC's Future Employment Growth Sectors Study and Industrial Land Review recognise the potential for additional jobs and growth in Park Royal and discuss a range of potential sectors, which are current specialisms or have the potential to grow, including the creative, ICT and Media, and Med Tech sectors. The Plan has been amended to reference all of these studies.
Employment, E1	Need to consider approach/policy on live-work development and this concept as a whole. Local residents living and working in the area would help transport issues.		London Borough of Brent, workshop, workshop	No change proposed. The Plan promotes a series of Places which include both residential and employment uses. The proximity of homes to places of work and social/community infrastructure should help to create more sustainable movement patterns and reduce the overall need to travel. Local Plan

				policy (E5) will require proposals to develop Local Labour, Skills, Training and Procurement Plans to increase skills and job opportunities for local communities. OPDC's partnership working with boroughs and existing businesses will also help to support this objective.
Employment, E1	The Local Plan rightly recognises life sciences as an innovative sector that can contribute to economic growth. MedCity, which was launched by the Mayor of London in April 2014 to promote and grow the life sciences sector in London and the greater south east, has commissioned a study to identify life science workspace needs that will be critical for future growth of the sector. The findings of this study, which is due to report by the end of March 2016, should be used to inform the design and operational requirements that would be needed to attract life sciences companies to the area.		GLA	Change proposed. The Plan has been amended to reference recommendations arising from the Future Employment Growth Sectors Study. OPDC's Future Employment Growth Sectors Study recognises that a number of sectors may be attracted and appropriately located in Old Oak and Park Royal, including the Medtech (or life sciences) sector, and highlights relevant supporting requirements. This evidence base has fed into the latest version of the Local Plan.
Employment, E1	Broad support for E1		Grand Union Alliance, Imperial College London, Old Oak Park (DP9), RBKC, local resident	No change proposed. The policy objectives in E1 are reflected in the new Strategic policy SP5, Employment policies E1 and E2, as well as Place policies.

Employment, E1	It is not clear what demand there is for additional office and commercial space or other potential sectors in Old Oak. Other locations have already/may continue to be attracted these clusters (e.g. Tech City) which may limit the scope for Old Oak. The latest figures from GLA employment projections have not been drawn on in the Industrial Land Review. Planning approach should not undermine this process but should be aware of the ways in which economic growth and expansion can emerges in specific locations.		Grand Union Alliance	Change proposed. The Plan has been amended to reference recommendations arising from the Future Employment Growth Sectors Study. This Study gathered further information on supply and demand trends in the wider economy and to understand which sectors are performing well within OPDC's area and opportunities for new economic sectors to emerge and be located in Old Oak and Park Royal. This evidence base has fed into the latest version of the Local Plan.
Employment, E1	The demand for different kinds of workspaces has not been determined. The cultural and economic diversity as well as the affordability and diversity of workspaces has stimulated these sector concentrations elsewhere.		Grand Union Alliance	Change proposed. The Plan has been amended to reference recommendations arising from the Future Employment Growth Sectors Study. This Study gathered further information on the type of support different sectors might need i.e. some may need access to lower cost workspace while for other access to Higher Education Institutions is very important. The Plan has been updated to reflect this evidence base.
Employment, E1	Question how the development would cope with an economic downturn, any negative impacts on London's role in the global financial sector.		Grand Union Alliance	No change proposed. The Plan itself does allow for some flexibility for change over time. The Plan will be subject to regular monitoring to track performance against key performance indicators. The evidence base may also be subject to updates to ensure information remains up to date. If this monitoring highlights issues then OPDC will consider whether a review of the Plan is necessary.

Employment, E1	Proximity/arrangement of different land uses needs to be carefully considered and some concern about the impacts associated with this including construction traffic.		Grand Union Alliance	No change proposed. Policies in the Employment chapter (E1, E2 and E4) and relevant Place policies require proposals for employment uses to minimise and appropriately mitigate potential impacts to surrounding land uses. The management of construction traffic is addressed in Transport policy T8.
Employment, E1	Land in Park Royal abutting residential areas in the east and north should focus on forming an appropriate buffer between industrial and residential uses. Suggestion that these areas could be used for mixed uses.		Grand Union Alliance	No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Policies require any new SIL uses in this area to be designed to minimise impacts on surrounding residential uses. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is reflected within the Local Plan's strategic policies.
Employment, E1	Existing inappropriate land uses in Park Royal which impact on residential areas should be reviewed.		Grand Union Alliance	Noted. Park Royal will continue to be protected as a Strategic Industrial Location (SIL) to support broad industrial and related activities. Policies will require

				that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses.
Employment, E1	Plan should monitor changes in employment, business activity and land use with a view to ensuring/agreeing appropriate support is offered to existing businesses, residents and activities negatively affected by development.		Grand Union Alliance	Noted. The Plan will be subject to regular monitoring to track performance against key performance indicators, including those related to the employment policies. The Plan includes policies focused on protecting existing employment capacity (E1), particularly smaller businesses.
Employment, E1	Bus depot on Station Road should be de-designated as SIL and could be relocated when land becomes available after HS2 construction has been completed.		Harlesden Neighbourhood Forum	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. The bus garage is in operation by TfL and is a SIL compliant use. TfL are not proposing to relocate the bus garage. Section 16 of the Mayor's Land for Industry and Transport SPG notes the importance of protecting land for bus garages and industrial land provides suitable space for bus garages and that such land should be protected.
Employment, E1	The plan should support new academic-related/ incubator uses (such as ThinkSpace) in the area in the future.		Imperial College London	Noted. OPDC's Future Employment Growth Sectors Study provides more information on sectors which could be located in Old Oak and Park Royal, and the level/types of support they might need to help them develop. This Study does include uses which would benefit from access to universities across west London. This evidence base has fed into the latest version of the Local Plan.

Employment, E1	Support for innovation centre		London Borough of Ealing	Noted. The Plan's policies allow flexibility for a range of employment sectors, which in turn could mean that the innovation centre(s)/cluster(s) could emerge in response to opportunities, as they arise over time.
Employment, E1	Intensification, regeneration and open workspace development could focus on existing residential areas in/adjacent to Park Royal (Wesley Estate, Island Triangle and Bashley Road)		Grand Union Alliance	Noted. Intensification, regeneration and open work spaces are supported by Employment policies in the Local Plan (E1, E2, E3) and Strategic Policies.
Employment, E1	OPDC should support a review of employment policies as part of the London Plan and commit to updating Park Royal Strategy accordingly.		London Borough of Ealing	No change proposed. OPDC has developed an extensive evidence base focussed on Park Royal to try and understand its role (including its particular specialisms) and how it compares with other locations. This evidence base has been used to inform the policies in the Local Plan and shared with GLA to help build on their strategic understanding of SIL locations in London and to aid any discussions on the London Plan Review.
Employment, E1	Restricting non-industrial land uses has had an adverse impact on residential communities as amenities/facilities needed by residents have disappeared.		Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. Park Royal will continue to be protected as a Strategic Industrial Location (SIL) to support broad industrial and related activities. OPDC has identified the range of infrastructure required to be provided within development area to meet the needs of the new population in the Place policies and Infrastructure Delivery Plan. The Park Royal Centre place policy does support additional town centre uses and services in order to meet the needs of the business and residential community. Additional retail development is also being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in these areas

Employment, E1	There is increasing recognition of the value of flexible workspaces. Plan should support this format and suggestion for this to include open, micro and artists workspaces.		Midland Terrace Resident's Group, LSDC	Noted. Park Royal will continue to be protected as a Strategic Industrial Location (SIL) to support broad industrial and related activities. OPDC has identified the range of infrastructure required to be provided within development area to meet the needs of the new population in the Place policies and Infrastructure Delivery Plan. The Park Royal Centre place policy does support additional town centre uses and services in order to meet the needs of the business and residential community. Additional retail development is also being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in these areas
Employment, E1	Open workspaces, micro workspaces and artists workspaces are often best provided in converted buildings due to lower cost/rent.		The Hammersmith Society	Noted. The Local Plan policy seeks to ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills.

Employment, E1	Strategy in Park Royal should be more flexible and could be geared towards a more mixed use approach. Suggestion that SIL could be re-classified as Strategic Commercial Land.		Midland Terrace Resident's Group, Old Oak Interim Forum, The Hammersmith Society	No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Policies will require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is reflected within the Local Plan's strategic policies. The term 'SIL' is used to reflect its designation in the London Plan and to ensure clarity and consistency with the scope of protection for industrial uses in this area.
Employment, E1	Demand for industrial uses may not materialise		Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. OPDC's Employment Future Growth Sectors Study and Industrial Land Review has been prepared to gather further information on supply and demand trends in the wider economy and to understand which sectors are performing well within OPDC's area and opportunities for new economic sectors to emerge and be located in Old Oak and

				Park Royal. This evidence base has fed into the latest version of the Local Plan.
Employment, E1	Plan should support the delivery of a range of types of workspaces suitable for different sized businesses		Old Oak Park (DP9)	Noted. A new policy on supporting small businesses has been inserted in the Plan (E3). The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units.
Employment, E1	Site should not be included in SIL designation		Raban Management Ltd	Change proposed. The existing residential units on Goodhall Street have been removed from SIL.
Employment, E1	Policy/justification should reference importance of creatives to London and links to existing creative clusters in RKBC, LBHF, Brent, Ealing and beyond.		RBKC	Noted. OPDC's Future Employment Growth Sectors Study has been prepared to gather further information on supply and demand trends in the wider economy and to understand which sectors are performing well within OPDC's area and opportunities for new sectors to emerge and be located in Old Oak and Park Royal. This evidence base has fed into the latest version of the Local Plan.

Employment, E1	Mixed use approach could be introduced as part of a new Place - Canalside Quarter		Midland Terrace Resident's Group, Old Oak Interim Forum,	Noted. A new place has been identified called Old Oak Lane and Old Oak Common Lane. This sets out clear guideline on the appropriate mix of uses, including industrial/employment uses, in this location. The approach takes into account that this is a transition point between Old Oak and Park Royal and how to protect SIL and support the existing residential communities in this area. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Policies will require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses.
Employment, E1	There could be increased demand for workspace which could affect values/rents and displace established businesses.		The Hammersmith Society, workshop	Noted. The Local Plan policy will ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills. It also seeks to protect existing employment capacity where this is compatible with other policy objectives.

Employment, E1	Emphasis should be given to providing opportunities to young people, supporting hubs, start-up businesses and training.		The Hammersmith Society, TITRA	Change proposed. Policies amended in the Plan. The Local Plan policies (E2 and E3) seek to ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills. Local Plan policy (E5) will require proposals to develop a Strategy and Management Plan to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.
Employment, E1	Suggestion that a High Tech start up could be developed in the area		Resident	Noted. OPDC's Future Employment Growth Sectors Study provides more information on sectors which could be located in Old Oak and Park Royal, and the level/types of support they might need to help them develop. This does include Advanced Manufacturing, ICT and Med tech. This evidence base has fed into the latest version of the Local Plan.
Employment, E1	Objection to more jobs being created.		Resident	No change proposed. London's economy is projected to grow, and more jobs are expected to be created as a result. In line with the NPPF and NPPG, local planning authorities must help facilitate and plan for sustainable economic growth. Due to the huge investment in transport infrastructure and potential capacity to accommodate growth, Old Oak and Park Royal have been identified as Opportunity Area in the London Plan. OPDC's Local Plan and other regeneration strategies seek to harness the benefits of this for local communities in and surrounding the OPDC area, including opportunities to secure jobs for local communities.
Employment, E1	Old Oak Common should provide a new business district for the greater London metropolitan area		Resident	Noted. The Local Plan's strategic policies set out clear priorities for the area. This includes the creation of a new business district and commercial destination for London.

Employment, E1	There needs to be a critical mass of employment in order to suport good level of expenditure and activity in local area.		Resident	No change proposed. The level of non-residential development proposed, including retail and other commercial uses, has taken into account a number of considerations, including demand, impacts and capacity. OPDC's Development Capacity Study brings together the findings of relevant evidence base to calculate how much development could be accommodated.
Employment, E1	It would be beneficial to incorporate affordable artist studio spaces as part of the project.		Local business, workshop	Noted. The Local Plan policy seeks to ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills. It also seeks to protect existing employment capacity where this is compatible with other policy objectives.
Employment, E1	Commercial uses are usually negatively affected (become vacant) when there are negative changes in property market		workshop	No change proposed. The Plan does allow for some flexibility for change over time. The Plan will be subject to regular monitoring to track performance against key performance indicators. The evidence base may also be subject to updates to ensure information remains up to date. If this monitoring highlights issues then OPDC will consider whether a review of the Plan is necessary.
Employment, E1	Need to accommodate more creative industries		workshop	Noted. OPDC's Future Employment Growth Sectors Study provides more information on sectors which could be located in Old Oak and Park Royal, and the level/types of support they might need to help them develop. This does include creative industries. This evidence base has fed into the latest version of the Local Plan.

Employment, E1	Question whether grants, extra services, training and reduced rent for start-up and small businesses to help create jobs		workshop, workshop	Change proposed. A new policy on 'Supporting Small Businesses' has been inserted in the Plan. The Local Plan policy (E3) seeks to ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills. Local Plan policy (E5) will require proposals to develop a Strategy and Plan to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.
Employment, E1	Question whether staff recruitment/training or lack of space is an issue which is constraining businesses		workshop	Noted. The Local Plan policy tackles both issues. Policies E2 and E3 seek to ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills. Local Plan policy will require proposals to develop Local plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.
Employment, E1	There should be a more detailed analysis of where people are coming from to work Many people commute by car and there was concern over the removal of car parks.		workshop	No change proposed. The Park Royal Transport Strategy analysed how people were travelling to work in Park Royal. This confirmed that approximately half of people travel by private vehicles, but it also found that those employees who travel by car live within 5- 8km radius of the centre of Park Royal. These distances are significant as a good proportion of cycle trips in Central London are between 5-8km in distance. Therefore, OPDC are focussing on ways to support the shift to more sustainable modes. This approach should help to reduce car trips and parking demand. More importantly, increased public transport connectivity, with the new HS2/Crossrail and London Overground, as well as existing stations in the area, will make Old Oak one of the most connected places in the UK.

Employment, E1	Approach to employment could benefit from looking at needs based on the variation of deprivation across the area		workshop	Noted. OPDC's Future Growth Sectors Study and Retail and Leisure Study provide more information on the type of sectors which could grow and be attracted to Old Oak and Park Royal - this includes manufacturing, retail and office related activities. This mix of sectors will generate the need for a broad of skills and new job opportunities. OPDC's socio-economic baseline identified existing issues with unemployment and deprivation and the Local Plan policies take opportunities help boost local employment. Policy E5 focusses on securing local labour, skills and training.
Employment, E1	Suggestion that a certain proportion of disabled people should be employed in new jobs created.		workshop	No change proposed. This is governed by separate legislation and cannot be directly influenced through planning policy. However, Local Plan policy will ensure that all buildings are designed to be accessible.
Employment, E1	Affordable childcare is a barrier to employment		workshop	Noted. This is covered by Local Plan policy TCC4.
Employment, E1	It is important to ensure that people in third age are also kept working		workshop	Noted. This is governed by separate legislation and cannot be directly influenced through planning policy.
Employment, E1	Would be good for there to be special guidance and assistance for small businesses in terms of tendering to work on contracts and services linked to the new developments		workshop, workshop	No change proposed. Local Plan policy (E5) will require proposals to develop plans to help provide new commercial opportunities for existing businesses. OPDC will work closely with boroughs to support this objective.
Employment, E1	Need to find data on employment and from other schemes (e.g. Westfield) in order to learn from these		workshop	Noted. OPDC has prepared a Precedents Study looking at a variety of case studies and identifying the lessons that can be learnt from these. This exercise will help OPDC to embed best practise into planning for the redevelopment and regeneration of the area.

Employment, E1	Question about construction related employees - how will they be considered in the planning of the development		workshop	Noted. Local Plan policy E5 will require proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.
Employment, E1	HS2 will mean the area will be highly connected to other locations in the UK. Plan should consider this and could encourage businesses outside of London to come to area.		workshop	Noted. OPDC's Future Employment Growth Sectors Study and Industrial Land Review has been prepared to gather further information on supply and demand trends in the wider economy and to understand which sectors are performing well within OPDC's area and opportunities for new economic sectors to emerge and be located in Old Oak and Park Royal. This evidence base has fed into the latest version of the Local Plan.
Employment, E1	Local businesses would like a future in the new development but concerned about the impact on their operations		workshop	Noted. The Local Plan seeks to protect businesses by requiring existing employment to be incorporated into new developments where this is compatible with other policy objectives. In addition to this, there is a policy (E5) in the Plan dedicated to trying to harness benefits from future development/change and secure opportunities for local communities and businesses, including mechanisms for supporting local supply chains as part of procurement related activities.
Employment, E1	Should consider impact on high street in surrounding centres		workshop	Noted. The Local Plan puts in place appropriate safeguards to ensure that impacts on neighbouring centres are minimised. Impact Assessments are required for schemes above certain thresholds in Old Oak and proposals are required to submit a town centre enhancement strategy, where proposals are likely to have adverse impacts. However, officers agree with the need for close working with Brent Council and local community groups to ensure that Harlesden remains a successful town centre and this

				acknowledgement has been inserted in the Local Plan.
Employment, E1	Question whether work will match skills base of existing population		workshop	Noted. Local Plan policy (E5) will require proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.
Employment, E1	Small businesses would like to own their own land as this would help protect against rent increases		workshop	Change proposed. New policy on 'Supporting Small Businesses' supports this objective. The Local Plan policy (E3) seeks to ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills. It also seeks to protect existing employment capacity where this is compatible with other policy objectives.
Employment, E1	Online shopping is impacting on traditional shopping		workshop	No change proposed. The impact of online shopping has been considered as part of the Retail and Leisure Needs Study, which has informed the approach in the Local Plan.

Employment, E1	Suggestions to find out what existing business want, i.e. including attending the Harlesden Neighbourhood Forum		workshop	Noted. OPDC has been actively engaging with businesses, particularly as part of detailed planning frameworks such as the Scrubs Lane Development Framework Principles, and business representatives, such as the Park Royal Business Group. OPDC has been working closely with the Harlesden Neighbourhood Forum both through attendance at meetings and in the development of the Harlesden Neighbourhood Plan. All of the Draft Local Plan consultation responses, including comments from businesses, have been considered as part of developing the Regulation 19 Local Plan.
Employment, E1	Support for protecting industrial provision and the the types of employment proposed, but policy could be nuanced to explain which types of indsutrial activities could go where		workshop	Noted. OPDC's Future Employment Growth Sectors Study and Industrial Land Review has been prepared to gather further information on supply and demand trends in the wider economy and to understand which sectors are performing well within OPDC's area and opportunities for new economic sectors to emerge and be located in Old Oak and Park Royal. This evidence base has fed into the latest version of the Local Plan.
Employment, E1	Hackney Wick is interesting case study as it is employment and residential		workshop	Noted.
Employment, E1	Could experiment with podium industries, different ones on different levels		workshop	Noted.
Employment, E1	Support for clean tech hub and low carbon and circular economy - this should be given added emphasis		workshop, LSDC	Noted. OPDC's Future Employment Growth Sectors Study and Industrial Land Review has been prepared to gather further information on supply and demand trends in the wider economy and to understand which sectors are performing well within OPDC's area and opportunities for new employment sectors to emerge and be located in Old Oak and Park Royal. This Study explores opportunities for a

				Low Carbon/Clean Tech hub. This evidence base has fed into the latest version of the Local Plan.
Employment, E1	Imperial College White City could be used more as a stimulus for activities in OPDC area.		LSDC	Noted. OPDC's Future Growth Sectors Study provides more information on sectors which could be located in Old Oak and Park Royal, and the level/types of support they might need to help them develop - this does include uses which would benefit from access to universities across west London. This evidence base has fed into the latest version of the Local Plan.
Employment, E1	Suggest linking the delivery of high grade digital communications to Park Royal to drive higher value employment.		LSDC	Noted. OPDC's Local Plan encourages a range of employment opportunities and uses. OPDC's Future Employment Growth Sectors Study provides more information on sectors which could be located in Old Oak and Park Royal; this evidence base has fed into the latest version of the Local Plan. The Local Plan acknowledges the current deficiencies in the broadband network in the area (smart technology, Policy EU11) and the need to work with broadband, telecommunication providers and developers to overcome this.
Employment, E1	Park Royal should be regarded as more of an opportunity area for more low-carbon development and high value businesses		LSDC	Noted. OPDC's Future Employment Growth Sectors Study provides more information on sectors which could be located in Old Oak and Park Royal, and the level/types of support they might need to help them develop - this does include the Clean Tech (low carbon) sector. This evidence base has fed into the latest version of the Local Plan.

Employment, E1 and E2	The Plan should discuss the approach to supporting and expanding existing economic uses/jobs in the Old Oak area (including cultural and making activities) and to retaining the kinds of physical spaces on which they depend to help ensure a net gain. This should be a priority. Existing clusters and areas of strength need to be identified and supported.		Grand Union Alliance, The Hammersmith Society, workshop	Noted. OPDC's Future Growth Sectors Employment Study and Industrial Land Review has been prepared to gather further information on supply and demand trends in the wider economy and to understand which existing sectors are performing well within OPDC's area and opportunities for new economic sectors to emerge and be located in Old Oak and Park Royal. This evidence base has fed into the latest version of the Local Plan. The Local Plan also seeks to protect existing employment capacity where this is compatible with other policy objectives.
Employment, E1 and E4	There needs to be more recognition and involvement of the artists/creative community located in the area Affordable space for artists/creative industries is needed as they are under great pressure in London. Facilities could be protected/incorporated into the plans.		Grand Union Alliance, Association for the Cultural Advancement through visual Art, Art West 2015 and Old Oak Neighbourhood Forum, local resident, local business, local resident, workshop	Noted. The Local Plan policy (E3) seeks to ensure a range of affordable workspaces are available to support artists, start up and small businesses; and other enterprises which help support local training and skills.
Employment, E1 and E4	The provision of affordable/low cost workspace is supported, and should be formalised in policy.		workshop, workshop	Noted. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units. This approach in E2 and E3 seeks to ensure a range of affordable workspaces are available to support start up and small

				businesses; and other enterprises which help support local training and skills.
Employment, E1 and E5	A charter needs to be put forward to ensure that businesses can remain in the area and cover relocation, displacement, CPOs, undue developer pressure.		Grand Union Alliance	Noted. The Local Plan policies (E1, E2 and E3) support existing and emerging employment sectors to grow in the OPDC area. The Plan seeks to protect existing employment capacity where this is compatible with other policy objectives.
Employment, E1, Figure 83, page 187	Figure 83 is inconsistent with rest of figures in its representation of First Central. Clarification is sought on whether this is an error.		Diageo PLC, SEGRO	Noted. All figures in the Plan have been amended.
Employment, E1, paragraph 8.1	Change paragraph 8.1 to include NPPF requirements and therefore greater clarity in relation to existing business sectors.		Grand Union Alliance	Noted. In order to keep the OPDC Local Plan spatial and succinct, the Plan does not seek to re-iterate or repeat policies already contained in the NPPF and London Plan unless it is particularly necessary. The Local Plan should therefore be read in conjunction with the NPPF, the associated National Planning Policy Guidance (NPPG) and the London Plan. All of these documents will be considered when determining planning applications.
Employment, E2	Local Plan needs to be more specific about where open workspace typologies will be delivered.		London Borough of Brent	No change proposed. Open workspaces can support a wide variety of employment sectors and could be compatible with a variety of other uses. Therefore, the Plan does not restrict their location to allow for an appropriate level of flexibility.

Employment, E2	Within Old Oak North open workspace suitable for SMEs should be secured at Willesden Junction Station and Cumberland Park Factory		London Borough of Brent	Change proposed. A new policy on 'Supporting Small Businesses' has been inserted in the Plan. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units. Open workspaces can support a wide variety of employment sectors, could be compatible with a variety of other uses and, therefore, could be suitable in a number of locations. The Plan does not restrict where they can be located to allow for an appropriate level of flexibility.
Employment, E2	Need to ensure E2 relates to Places policies so that it is clear where certain types of employment uses will be located		London Borough of Brent	Noted. The Places policies provide greater clarify on what type of employment uses may be appropriate.
Employment, E2	Policy should protect affordable and diverse business premises.		Grand Union Alliance	Changes proposed. New policy on 'Supporting Small Businesses' inserted in the Plan. The Local Plan policy (E2 and E3) seeks to secure a range of affordable workspaces, so that these can be available to support start up and small businesses; and other enterprises which help support local training and skills.
Employment, E2	Details need to be brought forward on how firms and other activities adversely affected by the development will be supported and compensated.		Grand Union Alliance	Noted. Policies throughout the Plan aim to appropriately mitigate the impacts of development.

Employment, E2	Alternative Policy Option (1) could be associated with a slower and smaller scale overall development option, especially in the shorter term, and encouraging wider spread of commercial uses.		Grand Union Alliance	No change proposed. Focussing office uses around the station takes advantages of the accessibility of this location. A more distributed approach to locating office uses would result in these uses being located in less accessible locations. As a result of this, the units could be less attractive relative to other office locations in London and therefore it could affect their uptake and viability.
Employment, E2	Alternative Policy Option (2) is not supported.		Grand Union Alliance	Noted.
Employment, E2	Alterations suggested to para 8.16 to add in other uses/activities.		Grand Union Alliance	Noted. The Employment policies and supporting text have been amended. The Place policies support a mix of uses and mixed use residential developments where appropriate. In conjunction with this, policies (E1, E2 and E3) in the Employment chapter support a range of employment floorspace including low cost and/or open workspaces and studios as part of commercial and mixed use developments.
Employment, E2	Broadly support E2		Midland Terrace Resident's Group, Old Oak Interim Forum, Old Oak Park (DP9)	Noted.
Employment, E2	Policy could more broadly refer to a range of workspace typologies and remove specific reference to open workspaces.		Old Oak Park (DP9)	Noted. A new policy on 'Supporting Small Businesses' (E3) has been inserted in the Plan. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units.

Employment, E2	Support for Alternative Policy Option (2) Not considered appropriate to promote industrial uses in Old Oak Park North at this stage.		Old Oak Park (DP9)	Noted. OPDC's Future Employment Growth Sectors Study and Industrial Land Review has been prepared to gather further information on supply and demand trends in the wider economy and to understand which existing sectors are performing well within OPDC's area and opportunities for new economic sectors to emerge and be located in Old Oak and Park Royal. This includes project demand for industrial uses. This evidence base has fed into the latest version of the Local Plan. The Local Plan also seeks to protect existing employment capacity where this is compatible with other policy objectives.
Employment, E2	Part b of E2 is too prescriptive at this stage		Old Oak Park (DP9)	Noted. The Local Plan policies will guide how the area will be developed over the next 20 years. In line with the NPPF, Local Plan policies need to be detailed enough to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency but also provide flexibility to accommodate a degree of future change. The Place and Town Centre policies have been updated and include a level of detail which proportionate to meeting the NPPF's objectives.
Employment, E4	Policy E4 should be removed in its entirety due the lack of supporting evidence for this policy.		Old Oak Park (DP9)	Noted. OPDC's Future Employment Growth Sectors Study provides more information on sectors which could be located in Old Oak and Park Royal, and the level/types of support they might need to help them develop. Some employment sectors will need access to more affordable or flexible workspaces in order to establish themselves. This evidence base has fed into the latest version of the Local Plan.
Employment, E2	If the area is dominated by a few powerful private landlords this will be detrimental to small businesses.		Local business	Noted. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the

				provision of a mix of unit sizes, including micro and smaller business units.
Employment, E2	Clarify whether 'Sword Site' to the north of the station is retained as Strategic Industrial Location		Local resident	Noted. The site is being de-designated in the Plan. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development.
Employment, E2	Old Oak West and sword site could have 'transitional' role, with wider commercial use, but with no loss of SIL for housing.		Local resident	Noted. The Channel Gate (P9) and North Acton and Acton Wells (P7) Place policies provide details on which uses are appropriate in these locations. Channel Gate (formerly Old Oak West) will continue to be designated as a Strategic Industrial Location (SIL). The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. The sword site (part of North Acton and Acton Wells Place) will be de-designated because of the significant transport improvements planned here and the opportunities this provides for high density mixed use development.
Employment, E2	All other ex-HS2 sites (apart from sword and Old Oak West) must remain as SIL.		Local resident	No change proposed. The Industrial Land Review sets out the rationale for the Strategic Industrial Location (SIL) boundary. Based on this, Channel Gate (formerly Old Oak West) will continue to be designated as a Strategic Industrial Location (SIL) and the other ex HS2 sites will be released from SIL.

Employment, E2	Idea of industrial innovation is overplayed; instead, this should be considered in future reviews of the Plan		Local resident	Noted. The Innovation Economy refers to the economic sectors associated with entrepreneurship and innovation. OPDC's Future Employment Growth Sectors Study and Industrial Land Review have been prepared to gather further information on supply and demand trends in the wider economy and to understand which existing sectors are performing well within OPDC's area and opportunities for new economic sectors to emerge and be located in Old Oak and Park Royal. This evidence base has fed into the latest version of the Local Plan.
Employment, E2	Retain SIL SE of Wesley Estate		Local resident	Noted. The area south-east the Wesley Estate will remain as SIL.
Employment, E2	There should be flexibility to allow crèches, gyms and (mainly night-time) restaurants in Park Royal		Local resident	Noted. The Place policies clarify which uses are appropriate in certain locations. Park Royal Centre and areas of Park Royal which are outside of SIL do allow flexibility for a range of non-industrial uses, where this is meets relevant policy objectives.
Employment, E2	Residential development should not be allowed in Park Royal but could be located within Park Royal Centre.		Local resident	Noted. The Place policies clarify which uses are appropriate in certain locations. Residential uses are not supported in SIL designated areas. Park Royal Centre and the Brewery cluster do allow flexibility for a range of non-industrial uses, where this does not undermine SIL and meets other policy objectives.
Employment, E3	The site numbers need to be cross-referenced in figure 86.		London Borough of Brent	Noted. There are now new figures in the Plan.

Employment, E3	The policy should include criteria to ensure where SIL borders residential area, a suitable buffer and mitigation is provided to prevent negative impacts.		London Borough of Brent	Noted. Local Plan policies require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses.
Employment, E3	Include guidance on where SMEs should be located		London Borough of Brent	No change proposed. SME workspaces can support a wide variety of employment sectors and could be compatible with a variety of other uses. Therefore, the Plan does not restrict their location to allow for an appropriate level of flexibility.
Employment, E3	Need to be clear what is meant by town centre uses		London Borough of Brent	Noted. Key terms including 'town centre uses' are defined in the glossary.
Employment, E3	Need to add site numbers to Figure 88		London Borough of Brent	Noted. There are now new figures in the Plan.
Employment, E3	Should reference as 'walk to' facilities rather than as ancillary		London Borough of Brent	Noted.
Employment, E3	SIL expansion not supported. The current allocation for the PRNC should be retained and not amended to allow for SIL expansion		Goodies Foods Ltd	Change proposed. The part of Site E3.19 within the identified Park Royal Centre boundary will not be taken forward for SIL designation. It is noted that this already includes existing town centre uses and there is ongoing demand for town centre uses in Park Royal Centre so existing retail floorspace needs to be supported to remain. The other proposed SIL expansion sites are still proposed for SIL designation.
Employment, E3	There is insufficient justification to re-allocate part of the existing PRNC to SIL.		Goodies Foods Ltd	Change proposed. The part of Site E3.19 within the identified Park Royal Centre boundary will not be taken forward for SIL designation. It is noted that this already includes existing town centre uses and there is ongoing demand for town centre uses in Park Royal Centre so existing retail floorspace needs to

				be supported to remain. The other proposed SIL expansion sites are still proposed for SIL designation.
Employment, E3	Concerns are raised about the potential for intensification in Park Royal without upgrades to transport infrastructure.		Grand Union Alliance	Noted. The Park Royal Transport Strategy identifies a range of transport interventions to support growth in Park Royal, including encouraging a modal shift and increasing the uptake of walking and cycling, in accordance with OPDC's sustainable transport hierarchy (see Policy SP7). It also includes exploring options for junction improvements to help improve the flow of traffic.
Employment, E3	Suggestion to relocate the existing recycling plants in Old Oak to Park Royal.		Grand Union Alliance	Noted. The Local Plan (EU6) includes details on the sequential approach that should be taken to the relocation of waste sites. OPDC propose to continue to safeguard the Powerday (Old Oak Sidings) waste site as it is required to meet Hammersmith and Fulham's apportionment requirements and as a construction waste recycling facility, would play an important role in helping OPDC to manage its construction waste.
Employment, E3	The range of economic activities in Park Royal does not seem to be captured. More detail should be provided on the London Office Policy Review (2012) and the loss of industrial land across the 3 boroughs.		Grand Union Alliance	Noted. The Park Royal Atlas, Future Employment Growth Sectors Study and Industrial Land Review provide a detailed body of evidence on the existing economic activities and trends across OPDC's area, including Park Royal. They reflect the area's current strengths, the loss of industrial land across the 3 boroughs, and the ongoing demand for industrial land. This evidence base has fed into the latest version of the Local Plan.
Employment, E3	Approach should ensure that uses located close to residents are more closely and effectively regulated.		Grand Union Alliance	Noted. The suite of Local Plan policies seek to ensure that significant adverse impacts are minimised and mitigated.

Employment, E3	Some areas could be more mixed use or considered for “soft” industrial uses.		Grand Union Alliance	Noted. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London’s largest industrial estate. The Plan does support the potential for a mix of land uses in Old Oak and this is reflected in the Local Plan’s Place and Employment policies.
Employment, E3	Retail and services should be spread through Park Royal.		Grand Union Alliance	Noted. The Park Royal Centre place policy supports additional town centre uses and services in order to meet the needs of the business and residential community. Additional retail development is also being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in these areas. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses’ operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.
Employment, E3	More emphasis could be provided on the potential spinoffs from existing and new uses/academic centres in the area e.g. advanced manufacturing, medical research, robotics.		Grand Union Alliance	Noted. OPDC's Future Employment Growth Sectors Study provides more information on sectors which could be located in Old Oak and Park Royal, and the level/types of support they might need to help them develop - this does include uses which would benefit from access to universities across west London. This evidence base has fed into the latest version of the Local Plan.

Employment, E3	The accommodation of displaced Old Oak businesses in suitably located areas should be a priority for any early developments in Park Royal.		Grand Union Alliance	Noted. OPDC is working to proactively identify additional opportunities for future development within Park Royal Strategic Industrial Location to try and accommodate 10,000 more jobs and provide space for new and existing businesses to relocate and expand. The Local Plan policy (E1) also seeks to protect existing employment capacity where this is compatible with other policy objectives.
Employment, E3	The return of HS2 work sites to SIL could be accommodated if soft and mixed industrial uses and intensification and regeneration initiatives were concentrated here and in other areas abutting residential use. Allocating more areas to more mixed uses could accommodate some of the displaced existing uses and more diverse work practices/uses.		Grand Union Alliance	No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Policies will require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is reflected within the Local Plan's strategic policies.

Employment, E3	De-designate metroline bus depot as SIL		Harlesden Neighbourhood Forum	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. The bus garage is in operation by TfL and is a SIL compliant use. TfL are not proposing to relocate the bus garage. Section 16 of the Mayor's Land for Industry and Transport SPG notes the importance of protecting land for bus garages and industrial land provides suitable space for bus garages and that such land should be protected.
Employment, E3	Figure 86 should not identify Westway/Brunel Road Industrial for SIL release, instead it would be better to meet equivalent housing target as part of mixed use strategy on Old Oak West		London Borough of Ealing	No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role.
Employment, E3	Needs to recognise spatial variance in Park royal		London Borough of Ealing	Noted. The Place boundaries have been amended and one additional Place - Old Park Royal - is now included. This change is to reflect the distinct character of Old Park Royal, identified through OPDC's evidence base including the Character Areas Study and Heritage Strategy.

Employment, E3	Consider that the extension, retention and consolidation of the current SIL policy risks holding back sustainable development. Should release SIL to allow for a new mixed use Place to emerge		Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. The Local Plan policies seek to protect, strengthen and intensify designated SIL. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Policies will require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is reflected within the Local Plan's strategic policies.
Employment, E3	Site should not be included in the industrial area.		Raban Management Ltd	Change proposed. The existing residential units on Goodhall Street have been removed from SIL.
Employment, E3	Supports the ongoing protection, retention and enhancement of SIL - there is strong justification for its protection		SEGRO	Noted.

Employment, E3	ILR does not distinguish between industrial units of differing quality to assess whether stock is fit for purpose.		SEGRO	Noted. The Industrial Land Review provides an assessment of supply and demand. The quality of the stock will affect this but the low levels of vacancy in Park Royal suggest that the majority of the stock serves the needs of businesses. However, OPDC is proactively trying to identify and encourage future development opportunities, through the Park Royal Intensification Study. Policies in the Employment and Park Royal Places chapter support intensification and therefore new forms of development coming forward which could better meet existing and future needs.
Employment, E3	Should recognise that more floorspace does not necessarily mean more jobs.		SEGRO	Noted. OPDC's Local Plan policies support intensification as a way to increase the number of jobs and help meet the 10,000 jobs target for Park Royal, as set out in the London Plan. This objective could be achieved in many ways, therefore, OPDC is developing more detailed evidence base (Park Royal Intensification Study) to explore different intensification strategies.
Employment, E3	Occupiers are demanding greater cubic content (building height) of buildings within Park Royal, and more external yard space linked to the rise in urban logistics.		SEGRO	Noted. OPDC's evidence base notes market trends and potential demand from a range of sectors, including logistics. This evidence base has helped inform the Local Plan. Detailed design matters will be considered on case by case basis to ensure any significant adverse impacts can be appropriately assessed and mitigated.
Employment, E3	SEGRO is currently considering opportunities for achieving denser industrial development		SEGRO	Noted. OPDC's Local Plan policies support intensification as a way to increase the number of jobs and help meet the 10,000 jobs target for Park Royal, as set out in the London Plan. This objective could be achieved in many ways, therefore, OPDC is developing more detailed evidence base (Park Royal Intensification Study) to explore different intensification strategies, and welcome opportunities

				to work with stakeholders, such as SEGRO, on this project.
Employment, E3	Should retain most of the SIL except Old Oak South north of the Great Western Main Line, and in Old Oak North.		Local resident	No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development.
Employment, E3	SIL extensions are supported		Local resident	Noted.
Employment, E3	Except main roads within a short distance of the Park Royal Centre dog-leg crossroads should permit more retail, if the market will support it.		Local resident	Noted. The Place policies clarify which uses are appropriate in certain locations. Park Royal Centre and areas of Park Royal which are outside of SIL, including new Clusters at First Central and Atlas Junction - do allow flexibility for a range of non-industrial uses, where this is meets relevant policy objectives. The level of non-residential development proposed, including retail and other commercial uses, has taken into account a number of considerations, including demand, impacts and capacity. OPDC's Development Capacity Study brings together the findings of relevant evidence base to calculate how much development could be accommodated.
Employment, E3	A local resident said that s/he objects to the 're-designation of strategic industrial locations'. S/he specifically mentioned the 'new mixed use land around Park Royal central line'			No change proposed. The Local Plan does not propose changes to the SIL designation around Park Royal tube station. New mixed use development is only being encouraged on non SIL sites, such as Park Royal Centre, First Central and Brewery Cluster.

Employment, E3	Concerned about existing residential areas in industrial areas		workshop	Noted. The suite of Local Plan policies seek to ensure that significant adverse impacts are minimised and mitigated.
Employment, E3	A local community representative stated that there will be a ‘substantial change to the industrial area. I see 5-6 story buildings as a bit conventional and having an office block employment may not be popular in the future’			Noted.
Employment, E3	Look at density for employment to help take pressure off other areas for residential		workshop	Noted. OPDC's Local Plan policies support ways to increase the number of jobs and employment density and floorspace. This objective could be achieved in many ways, therefore, OPDC is developing more detailed evidence base to explore different intensification strategies.
Employment, E3	Could look at double decking options on the existing units		workshop	Noted. OPDC's Local Plan policies support intensification as a way to increase the number of jobs and help meet the 10,000 jobs target for Park Royal. This objective could be achieved in many ways, therefore, OPDC is developing more detailed evidence base (Park Royal Intensification Study) to explore different intensification strategies.
Employment, E3	Query whether there is much data on businesses at the moment?		workshop	Noted. The Park Royal Atlas and Future Employment Growth Sectors Study provides a useful baseline of existing businesses and economic trends over time.
Employment, E3	Questioned why loss of industrial land is not seen as an issue on the Old Oak Common page of the draft Plan		workshop	Noted. The Industrial Land Review considers the loss of industrial land across London, and the ongoing demand for industrial land. Based on this evidence, the Plan identifies land in Park Royal which will continue to be protected as designated Strategic Industrial Location. OPDC's Local Plan policies also support the intensification of this

				industrial land so that an increasing number of jobs and businesses can be accommodated. This objective could be achieved in many ways and evidence for this is provided within OPDC's Park Royal Intensification Study.
Employment, E3	Questioned how Park Royal will be protected and enhanced through the Local Plan - concerned that big sheds will take over		workshop	Noted. The Plan identifies land in Park Royal which will continue to be protected as designated Strategic Industrial Location. OPDC's Local Plan policies and Infrastructure Delivery Plan include a range of interventions which will enhance Park Royal such as new or upgraded routes and urban greening. A new Old Park Royal Place has been identified to recognise and protect the different character within this area, including the predominance of small business space. The Employment policies also require developments to provide a mix of unit sizes so that a range of needs can be met.
Employment, E3	Need to ensure local people have the skills to get local jobs		workshop	Noted. Local Plan policy (E5) requires proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.
Employment, E3	Query whether intensifying employment in the Park Royal area would result in displacement		workshop	Noted. OPDC's Local Plan policies support intensification as a way to create additional jobs/economic opportunities and help meet the 10,000 jobs target for Park Royal. The intention of this exercise is not to displace employment uses. Intensification could be achieved in many ways. OPDC's Park Royal Intensification Study provides evidence for this.
Employment, E3	There are underused areas - there should be a joint approach across Brent and Ealing part of Park Royal		workshop	Noted. OPDC is the local planning authority for parts of Brent and Ealing, including the Park Royal area. OPDC is working collaboratively with these

				boroughs to deliver a co-ordinated approach to planning for positive change in this area.
Employment, E3	Linkages between Park Royal and other parts of London, as synergy and relationships, are important i.e. looking at supply chains		workshop	Noted.
Employment, E3	Park Royal Business Group aims at big businesses, the little ones needs engaging with too.		workshop	Noted.
Employment, E3	Intensification presents opportunities for creative approaches to sustainability and use of resources.		LSDC	Noted. OPDC's Local Plan policies support intensification as a way to increase the number of jobs and help meet the 10,000 jobs target for Park Royal. This objective could be achieved in many ways, therefore, OPDC is developing more detailed evidence base (Park Royal Intensification Study) to explore different intensification strategies.
Employment, E4	Incubators with rapidly rising rents do not work for artists		Association for the Cultural Advancement through visual Art	Noted. The Local Plan policy (E3) seeks to ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills.
Employment, E4	Events are held such as the ArtWest Open Studio event which is much appreciated by neighbouring residents and visitors		Art West 2015 and Old Oak Neighbourhood Forum	Noted.
Employment, E4	Would like to see specific reference to the studio requirements of professional artists and a commitment to		Association for the Cultural Advancement through visual Art	Change proposed. The Plan now acknowledges the importance of studio provision as part of future employment space (see E1, E2, E3) and its contribution to arts and culture (TCC5)

	work with experienced providers			
Employment, E4	Support for E4		London borough of Brent, Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, local resident, LSDC	Noted. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units.
Employment, E4	Evidence on demand for open workspace is needed		Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Park (DP9)	Noted. OPDC's Future Growth Sectors Study provides more information on sectors which could be located in Old Oak and Park Royal, and the level/types of support they might need to help them develop. Some employment sectors will need access to more affordable or flexible workspaces in order to establish themselves. This evidence base has fed into the latest version of the Local Plan.
Employment, E4	A range of scruffy and cheap buildings should be preserved in Park Royal to enable affordable and diverse uses consistent with open work space policies; policies of active management of regeneration should be tempered by this goal.		Grand Union Alliance	Noted. OPDC's Future Growth Sectors Study provides more information on sectors which could be located in Old Oak and Park Royal, and the level/types of support they might need to help them develop. Some employment sectors will need access to more affordable or flexible workspaces in order to establish themselves. This evidence base has fed into the latest version of the Local Plan. The Local Plan policy requires affordable workspace to be delivered as part of all major development proposals, including new buildings. The primary

				objective would be to ensure that the units are fit for purpose and affordable.
Employment, E4	Developments need to ensure there is scope for property ownership within the diverse offer of business premises.		Grand Union Alliance	Noted. The policy on new employment floorspace (E2) should help ensure major developments include a range of cost and tenure arrangements.
Employment, E4	Need to consider the types and sizes of businesses/activities that will require affordable workspace (s106 prioritisation, % of market rents, specification required for workspace providers)		Grand Union Alliance	Noted. OPDC's Future Employment Growth Sectors Study and Industrial Land Review has been prepared to gather further information on which sectors are performing well within OPDC's area and the potential demand from new economic sectors. This evidence base has fed into the latest version of the Local Plan. It is understood that some of these sectors will need support to establish themselves, including the provision of flexible and/or low cost workspace. The Local Plan policy seeks to ensure a range of workspaces are available.
Employment, E4	Different terms are used - affordable and open workspaces - these should be clarified and used consistently.		Grand Union Alliance	Noted. This has been clarified in the Local Plan.
Employment, E4	Open workspaces are more likely to succeed in proximity to smaller, more intensively used units.		London Borough of Ealing	Noted. Open workspaces can support a wide variety of employment sectors and could be compatible with a variety of other uses. Therefore, the Plan does not restrict their location to allow for an appropriate level of flexibility.

Employment, E4	Would support open workspaces in Old Oak North and Scrubs Lane/Mitre Bridge and a new proposed Place		Midland Terrace Residents Group, Old Oak Interim Forum	Noted. Open workspaces can support a wide variety of employment sectors and could be compatible with a variety of other uses. Therefore, the Plan does not restrict their location to allow for an appropriate level of flexibility.
Employment, E4	PRS developments should be required to provide an element of open workspace, secured through 106 agreements.		Midland Terrace Residents Group	Noted. The Place policies support a mix of uses and mixed use residential developments where appropriate. In conjunction with this, policies (E2 and E3) in the Employment chapter would require new major developments providing employment floorspace to include low cost and/or open workspaces and studios.
Employment, E4	Query need for specific policy on this, instead it should be more flexible, related to viability of proposals and merged into a strategic policy		Old Oak Park (DP9)	Noted. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units. The Strategic Policy (SP5) supports this objective.
Employment, E4	Should define major commercial development in the context of this policy		Old Oak Park (DP9)	Noted. This has now been clarified in employment policy E2.
Employment, E4	Need to consider what 'affordable' and how this will be delivered in practice through development (s106 prioritisation, % of market rents, specification required for workspace providers)		Old Oak Park (DP9), Grand Union Alliance	Noted. OPDC's Future Growth Sectors Employment Study identify a range of employment sectors which may need support to establish themselves, including the provision of flexible and/or low cost workspace. The Local Plan policy (E2 and E3) seeks to ensure a range of workspaces are available. More details on how this will be secured will be included in the s106 SPD.
Employment, E4	There is the opportunity to create a large studio building for artists in North West London.		local business	Noted. The policies in the Employment (E2 and E3) and Town Centre and Community Uses chapters in Local Plan support the delivery of new artist studio space.

Employment, E4	Local access to employment and training for people in the areas to the north and south of OPDC area should be the priority.		local resident	Noted. Local Plan policy requires proposals to develop plans to increase skills and job opportunities for local communities. OPDC's Section 106 Supplementary Planning Document will include more detail on how this would be secured and what the priorities could be. OPDC will work closely with boroughs to explore how to increase access to employment and training opportunities.
Employment, E4	Small businesses in surrounding area will be affected, should benefit from this and they need to be thought about		workshop	Noted. The policy approach has been structured to clarify support for a mix of unit sizes, including micro and smaller business units.
Employment, E4	The right type of workspace need to be provided to help with affordability issues. There needs to be a study on what the need is and what is affordable.		workshop	Noted. OPDC's Future Employment Growth Sectors Study and Industrial Land Review has been prepared to gather further information on which sectors are performing well within OPDC's area and the potential demand from new economic sectors. This evidence base has fed into the latest version of the Local Plan. It is understood that some of these sectors will need support to establish themselves, including the provision of flexible and/or low cost workspace. The Local Plan policy seeks to ensure a range of workspaces are available.
Employment, E4	Need to talk to businesses to understand viability of providing different types/range of workspace typologies		workshop	Noted. OPDC invited a range of stakeholders, including businesses, to participate and comment on the Draft Local Plan consultation and will continue to work with key groups such as the Park Royal Business Group. The Local Plan policy has been updated to ensure the needs of workspace providers and businesses are considered as part of future developments. Policy E2 requires developers to undertake early engagement with workspace providers and a range of employment sectors to

				ensure the design is deliverable and responsive to the needs of potential business occupiers.
Employment, E4	Should try to retain/provide a range of spaces that can be flexible, a range of spaces for potential future uses. You will always need space for cheap and expensive operations. They should help integrate/involve the existing business community		workshop	Noted. The employment policies support both the retention of existing employment floorspace and the delivery of new employment floorspace. Within this, there is flexibility for a range of workspaces to support businesses and other enterprises, including open and low cost workspaces. OPDC invited a range of stakeholders, including businesses, to participate and comment on the Draft Local Plan consultation and will continue to work with key groups such as the Park Royal Business Group.
Employment, E4	'Factory flats' in the area could intensify employment		workshop	Noted. OPDC's Local Plan policies support intensification as a way to increase the number of jobs and help meet the 10,000 jobs target for Park Royal. This objective could be achieved in many ways, therefore, OPDC is developing more detailed evidence base (Park Royal Intensification Study) to explore different intensification strategies.
Employment, E4	suggestion of affordable industrial and smaller-scale, affordable work space / offices		workshop	Noted. The Local Plan policy seeks to ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills.

Employment, E4	Don't have a traditional viaduct with a succession of arches, look for best practice (i..e Lille) elsewhere		workshop	Noted.
Employment, E4	Concern that a range of typologies may not get delivered/maintained because of viability considerations		workshop	Noted. The Local Plan policy has been updated to ensure the needs of workspace providers and businesses are considered as part of future developments. Policy E2 requires developers to undertake early engagement with workspace providers and a range of employment sectors to ensure the design is deliverable and responsive to the needs of potential business occupiers.
Employment, E4	There are examples of mixing start-ups and bigger businesses in a building and evidence that it helps sell more expensive space when the sectors are interrelated.		LSDC	Noted.
Employment, E4	In the early years of the development, affordable/open workspaces should be located close to transport hubs and areas of limited disruption.		LSDC	Noted. The Local Plan policy seeks to ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills.
Employment, E5	Should consider the need to provide jobs for local people, especially the young and long-term unemployed.		Andy Slaughter MP	Noted. Local Plan policy requires proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.

Employment, E5	Broad support for policy E5		London Borough of Brent, Midland Terrace Resident's Group, Old Oak Interim, Old Oak Park (DP9), SEGRO	Noted.
Employment, E5	The investment in socio-economic regeneration staff, and the range of good ideas expressed is noted.		Grand Union Alliance	Noted.
Employment, E5	Support for protecting existing local jobs and workspaces, particularly those which are already suited to the skills profile of the population.		Grand Union Alliance	Noted. The employment policies support both the retention of existing employment floorspace and the delivery of new employment floorspace. Within this, there is flexibility for a range of workspaces to support businesses and other enterprises, including open and low cost workspaces.
Employment, E5	Targets of local people in employment, and in apprenticeships and training should be set and specific actions, timescales and outcomes related to this should be detailed in the Plan. Suggestions include compacts, on site technical college.		Grand Union Alliance	Noted. Local Plan policy requires proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.

Employment, E5	Support for helping local people benefit from regeneration through access to jobs and skills training. This could be achieved by protecting existing jobs and workspaces and better links.		Grand Union Alliance, workshop, workshop, workshop	Noted. The employment policies support both the retention of existing employment floorspace (E1) and the delivery of new employment floorspace (E2). Within this, there is flexibility for a range of workspaces to support businesses and other enterprises, including open and low cost workspaces. Local Plan policy will require proposals to develop plans to increase skills and job opportunities for local communities.
Employment, E5	No data has been presented on the existing relationship between home and workplace location.		Grand Union Alliance	No change proposed. The Park Royal Transport Strategy analysed how people were travelling to work in Park Royal. This confirmed that approximately half of people travel by private vehicles, but it also found that those employees who travel by car live within 5- 8km radius of the centre of Park Royal. These distances are significant as a good proportion of cycle trips in Central London are between 5-8km in distance. Therefore, OPDC are focussing on ways to support the shift to more sustainable modes. This approach should help to reduce car trips and parking demand. More importantly, increased public transport connectivity, with the new HS2/Crossrail and London Overground, as well as existing stations in the area, will make Old Oak one of the most connected places in the UK.
Employment, E5	Additional Preferred Policy Option suggested to support existing and emerging businesses with links to other businesses in the area.		Grand Union Alliance	Noted. The employment policies seek to protect existing employment floorspace, where appropriate, and support the delivery of new employment floorspace (E1 and E2). The Future Employment Growth Sectors Study and Industrial Land Review provide detailed information on supply and demand trends in the wider economy. They also highlight which sectors are performing well within OPDC's area and opportunities for new economic sectors to emerge and be located in Old Oak and Park Royal.

				These sectors are supported in the Local Plan. This evidence base has fed into the latest version of the Local Plan.
Employment, E5	An onsite technical/training college should be sought early in the development process to directly support local training.		Grand Union Alliance	Noted.
Employment, E5	Support for Local Employment and Training Agreement		Old Oak Park (DP9)	Noted.
Employment, E5	Training opportunities should be available to all those living in the vicinity and not just the OPDC boroughs		RBKC	Noted. Local Plan policy (E5) will require proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.
Employment, E5	The creation of a dedicated skills and training centre on Park Royal would be a critical asset in ensuring business have access to a talented local workforce.		SEGRO	Noted. Local Plan policy (E5) will require proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective. It is noted that on-site skills and training centre is one way of contributing towards this objective.

Employment, E5	Attracting large scale commercial tenants to the site would allow people to live and work locally, reducing commuting levels.		Local resident	Noted. The Plan promotes a series of Places which include both residential and employment uses. The proximity of homes to places of work and social/community infrastructure should help to create more sustainable movement patterns and reduce the overall need to travel. Local Plan policy (E5) will require proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this
Employment, E5	There should be support to help young people access affordable skills training, including into creative/cultural industries		Local resident	Noted. Local Plan policy (E5) will require proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective
Employment, E5	Employment and training opportunities will be adversely impacted on by the high cost of living and spaces for training.		Local resident	Noted. Local Plan policy (E5) will require proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective. This would be secured as a contribution which means that the developer would pay the agreed costs. Other policies developed in the Local Plan will also require affordable housing.
Employment, E5	Should support cultural start-ups and small companies		Local resident	Noted. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units.
Employment, E5	Youth employment/training		Local resident	Noted. Local Plan policy (E5) will require proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective
Employment, E5	Quality employment training facilities will be important		workshop	Noted.

Employment, E5	Should find out what businesses need so that training can be tailored to them.		workshop	Noted. Local Plan policy (E5) will require proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.
Employment, E5	Businesses should talk with schools		workshop	Noted.
Employment, E5	Lack of people trained in construction, need to encourage young people and unemployed .This might require a different approach/additional research. Potential to make more of the construction training currently provided at north west London college.		workshop (x3)	Noted. The Socio-Economic baseline report for Old Oak and Park Royal (March 2016) provides a baseline of socio-economic and demographic indicators, including employment related indicators. This gives a clear basis for understanding the current context and to monitor changes over time. OPDC's Local Plan will require proposals to develop plans to increase skills and job opportunities for local communities, including apprenticeships.
Employment, E5	Funding for apprenticeships and work experience programmes is being decreased so alternative sources of funding are being considered		workshop	Noted. Local Plan policy will require proposals to develop plans to increase skills and job opportunities for local communities, including apprenticeships.
Employment, E5	Area could become known as an area for training		workshop	Noted.
Employment, E5	Links with Universities, colleges and schools are important		workshop	Noted.
Employment, E5	Interesting in knowing which sites could offer training		workshop	Noted.
8. Employment, Policy E5	OPDC should try and ensure that local businesses can benefit from procurement opportunities during the	1	Local business	Noted. OPDC has inserted wording within the strategic policies referencing the potential for local businesses to benefit from procurement opportunities

	construction of the development			
8. Employment, Policy E4	Support Policy E4	1	Midland Terrace Resident's Group, TITRA	Noted. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units.
8. Employment, Policy E1	Support approach to safeguarding SIL in Park Royal	3	Residents, London Sustainable Development Commission	Noted.
8. Employment, Policy E1	The Local Plan should be more specific about the types of employment it will look to attract to the area	2	London Sustainable Development Commission, 1 resident	Noted. OPDC's Future Employment Growth Sectors Study and Industrial Land Review has been prepared to gather further information on supply and demand trends in the wider economy and to understand which sectors are performing well within OPDC's area and opportunities for new economic sectors to emerge and be located in Old Oak and Park Royal. This evidence base has fed into the latest version of the Local Plan.
8. Employment, Policy E5	Need to focus on long-term and medium to high skills employment opportunities	2	2 Residents	Noted. Local Plan policy (E5) will require proposals to develop plans to increase skills and job opportunities for local communities. OPDC will work closely with boroughs to support this objective.

8. Employment, Policy E1	The Plan should make reference to the potential for a cleantech cluster within OPDC	1	London Sustainable Development Commission	Noted. OPDC's Future Employment Growth Sectors Study and Industrial Land Review has been prepared to gather further information on supply and demand trends in the wider economy and to understand which sectors are performing well within OPDC's area and opportunities for new employment sectors to emerge and be located in Old Oak and Park Royal. This Study will explore opportunities for a Low Carbon/Clean Tech hub. This evidence base has fed into the latest version of the Local Plan.
8. Employment, Policy E4	Should provide low cost studio and business space	1	1 Resident	Noted. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units. This approach seeks to ensure a range of affordable workspaces are available to support start up and small businesses; and other enterprises which help support local training and skills.
Employment, E3	Twyford Tip site has extant planning permission for leisure/entertainment use and is capable of creating significant employment. The Local Plan should reflect the extant permission in terms of use classes for this site and be removed from the SIL designation.		Asian Sky Properties	No change proposed. The Local Plan has focussed the release of SIL close to the HS2 station given the significant transport improvements planned here and the opportunities this provides for high density mixed use development. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role.

9. Town Centre Uses

Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
9. Town Centre Uses, Policy TC1, Cultural Principles Study	Need to recognise local need for culture more, rather than focussing on promoting London-wide need	1	Grand Union Alliance	No change proposed. The Local Plan recognises the need for culture to meet the needs of existing and future local communities; however, given the scale of opportunity, particularly at Old Oak, OPDC considers that it is important to recognise that culture and leisure facilities will also be capable of meeting a strategic need to the benefit of Londoners.
9. Town Centre Uses, Policy TC1, Cultural Principles Study	OPDC should provide funding to local communities to facilitate and support the community to develop a cultural strategy	1	Grand Union Alliance	No change proposed. OPDC would involve local communities in the production of any cultural strategy. Any Neighbourhood Plan could look to develop its own Cultural Strategy
9. Town Centre Uses, Policy TC2	A new neighbourhood centre should be identified for the Atlas Road roundabout.	6	Grand Union Alliance, Wells House Road Resident's Association, 4 residents	Change proposed. OPDC's Retail and Leisure Needs Study was revised following the Regulation 18 consultation. Given the recent developments in this location, OPDC considers that it is appropriate to designate a Neighbourhood Centre in this location
9. Town Centre Uses, Policy TC6	Support for hotels	1	Resident	Noted

9. Town Centre Uses, Policy TC6	Concern that too many hotels could result in more traffic	1	Resident	Noted. Hotels are considered commercial development and are therefore controlled through OPDC's car parking policies for commercial development. Policy TCC10 (visitor accommodation) also requires hotels to be located close to public transport, in particular rail stations
9. Town Centre Uses, Policy TC2	The approach to hierarchy is overly restrictive and should only apply to units over a certain size threshold	1	Aurora Developments Ltd (Quod)	No change proposed. The approach to requiring impact assessments is evidenced through OPDC's Retail and Leisure Needs Study, which identifies that as 3 out of the 4 proposed town centres within the OPDC area were not designated centres prior to this Local Plan, it is sensible to still require impact assessments to ensure that impacts on existing designated centres are minimised.
9. Town Centre Uses, Policy TC2	Object to proposed major town centre at Old Oak as it would draw trade from neighbouring centres	1	Brent Council	No change proposed. The Retail and Leisure Needs Study has assessed the impact of the proposed designation of a major town centre at Old Oak on neighbouring centres. The study found the impacts to be acceptable subject to appropriate controls being put in place. These controls have been incorporated into the Local Plan's policies, specifically policies TCC1 and TCC3.
9. Town Centre Uses, Policy TC4	At present there is nothing in the plan to prevent a significant quantum of retail floorspace being brought forward in early phases to the detriment of both nearby centres and Old Oak High Street	1	Brent Council	Change proposed. Policy TCC3 now incorporates a requirement for A-class uses to be phased so that they are delivered in accordance with demand created by the delivery of homes and jobs and that regard be had to the up to date retail and leisure needs study for the OPDC area including the recommended distribution of A-Class uses across the area

9. Town Centre Uses, Policy TC4	Recognition is needed that the Retail Study has identified the development of a centre at Old Oak, will impact on Harlesden's growth and the OPDC, working with Brent Council, the Harlesden Neighbourhood Forum and other community groups must be active in mitigating negative impacts	3	Brent Council, Grand Union Alliance, Harlesden Neighbourhood Forum	Change proposed. The Local Plan has been amended so that development proposed in the Old Oak South, Old Oak North and Willesden Junction places which provide over 5,000sqm of A-class uses must submit a Harlesden Enhancement Strategy and that the strategy should be discussed with OPDC, Brent and appropriate local community groups prior to submission.
9. Town Centre Uses, Policy TC2	Policy TC2 has not been coordinated with the local authorities, yet London Plan Policy 2.15 requires this	1	Brent Council	Noted. In accordance with the Duty to Cooperate, the draft policy was discussed with the local authorities in advance of publication of the Regulation 18 draft Local Plan and in the intermediary period between the Regulation 18 and Regulation 19 draft documents.
9. Town Centre Uses, Policy TC2, Development Capacity Study	Consideration needs to be given to the impact a higher proportion of retail floorspace will have on achieving housing targets.	1	Brent Council	No change proposed. The amount of retail proposed in the Retail and Leisure Needs Study has been modelled within OPDC's development capacity study. The delivery of retail floorspace will be monitored in OPDC's Authority Monitoring Report and any significance deviance from the approach outlined in the policy will trigger a potential review of the evidence and associated policy.
9. Town Centre Uses, Policy TC2	The Local Plan needs to set clear town centre boundaries	2	Brent Council, Hammersmith and Fulham Council	Change proposed in part. Clear town centre boundaries have been set for the established town centre in Park Royal. Boundaries for new town centres are indicative as their exact boundary will be contingent on the alignment of key routes. This approach was taken by the LLDC in the policies map in support of their Local Plan and is an appropriate approach to take where a centre has not yet been established.

9. Town Centre Uses, Policy TC2	the threshold of 5,000sqm and 2,500sqm for a retail impact assessment is too high and not appropriate, given the existing context of small-scale shops in surrounding centres	2	Brent Council, Grand Union Alliance	No change proposed. The Retail and Leisure Needs Study has assessed the impact of town centre uses on designated centres and identified appropriate mitigation measures to ensure that impacts are minimised. These measures have been incorporated into the Local Plan's policies. The thresholds identified in the Retail and Leisure Study and Local Plan accord with the threshold in the NPPF, but goes beyond these requirements by also identifying that the impact assessments would also be required within designated centres, as these are emerging, as not yet established centres. OPDC considers this approach will ensure that impacts on existing designated centres are appropriately mitigated.
9. Town Centre Uses, Policy TC2	Support alternative option 3	1	Brent Council	No change proposed. OPDC proposed to continue with the preferred policy option approach of identifying and planning for the new town centre at Old Oak High Street as being a major town centre.
9. Town Centre Uses, Policy TC2	Old Oak does not need to be designated as a major centre to provide culture, sport and leisure facilities. Designation of a Strategic Cultural Area would be a more appropriate mechanism to promote the area for such uses.	1	Brent Council	No change proposed. The scale of A-class uses envisaged to be required during the Local Plan period within Old Oak High Street town centre is 57,250sqm. The threshold in the London Plan for a major town centre is >50,000sqm. This puts the Old Oak High Street Centre within this categorisation based on its A-class uses alone, not allowing for the additional town centre uses within other uses Classes, which would be needed to create a vital and viable town centre.
9. Town Centre Uses, Policy TC2	A decision as to whether the centre should become a major centre, should be taken through the London Plan review	1	Brent Council	No change proposed. It is appropriate for and necessary for the Local Plan to designate town centres.

9. Town Centre Uses, Policy TC4	Support requirement for a Retail Vision Statement	1	Brent Council	Noted.
9. Town Centre Uses, Policy TC3	Should set clear policy as to what constitutes an overconcentration of betting shops, pay-day loan shops and games arcades. It should also set a clear limit on the proximity of takeaways to schools.	3	Brent Council, Diocese of London, Hammersmith and Fulham Council	Change proposed. The policy now sets a metre distance for these uses.
9. Town Centre Uses, Policy TC4	The quantitative need should be broken down to show how it should be distributed across Old Oak	1	Brent Council	Change proposed. The table of quantitative need has been broken down by centre and included in the Local Plan. Policy TCC3 requires proposals to have regard to this.
9. Town Centre Uses, Policy TC4	A threshold is needed to identify when a Town Centre Enhancement Strategy will be required.	1	Brent Council	Change proposed. A threshold has been identified of 5,000sqm, to align with the requirements for an impact assessment in Old Oak High Street. The requirements for a Harlesden Enhancement Strategy have been incorporated into the Old Oak South, Old Oak North and Willesden Junction place policies, where large-scale town centre uses are likely to be proposed and are likely to have the most significant impact on Harlesden Town Centre.
9. Town Centre Uses, Policy TC6	Policy should also include reference to ensuring visitor accommodation does not compromise the supply of conventional homes.	1	Brent Council	Change proposed. This has been included as a criteria in the policy (Policy TCC10).
9. Town Centre Uses, Policy TC6	Policy should also be clear that visitor accommodation cannot become permanently occupied, and conditions will be applied accordingly	1	Brent Council	Change proposed. This has been included as a criteria in the policy (Policy TCC10).

9. Town Centre Uses, Policy TC7	Should take a more flexible approach to opening hours in Park Royal to support businesses that operate 24 hours. This approach would also result in benefits in improving feelings of safety.	1	Brent Council	No change proposed. The policy allows for proposals for extended opening hours, subject to criteria being met, which look to protect the amenity of neighbours. A blanket approach to allowing extended opening hours in Park Royal without consideration of these issues is not considered appropriate.
9. Town Centre Uses, Policy TC1	Town centre uses will be crucial to the successful regeneration of the area	1	Canary Wharf Group PLC	Noted.
9. Town Centre Uses, Policy TC2	Should acknowledge the role that small format A-class uses can have within new developments which may not be located within or adjacent to a town centre, but which can provide support to new residents and businesses.	1	Diageo PLC	No change proposed. Policy TCC1 identifies the appropriate locations for town centre uses. Proposals for out of centre uses would need to accord with the requirements of the NPPF sequential test.
9. Town Centre Uses, Policy TC1	Support Policy TC1	2	Diocese of London, Old Oak Park (DP9)	Noted.
9. Town Centre Uses, Policy TC4	Need to ensure that impacts on Harlesden are mitigated and that opportunities for its enhancement are taken	3	Diocese of London, Harlesden Neighbourhood Forum, 1 resident	Noted. The policy requirements for impact assessments and for applications within certain places to submit a Harlesden Enhancement Strategy are to ensure that impacts on Harlesden town centre are appropriately mitigated.

9. Town Centre Uses	Should include town centre health checks for existing areas to help identify gaps in provision	1	Greater London Authority	No change proposed. Given the scale of development envisaged, it is anticipated that a range of town centre uses will be required to meet a variety of needs. As only one of the four proposed town centres is currently designated and this centre is of a relatively small-scale, there is very little context to what will be delivered in the future. OPDC's Authority Monitoring Report will monitor the implementation of future town centre uses and as town centre uses are delivered, OPDC will assess the appropriateness of undertaking town centre health checks.
9. Town Centre Uses	The local plan should be considering issues such as shopmobility schemes, changing places facilities blue badge parking	1	Greater London Authority	Noted. Car parking requirements are covered in the transport chapter (Policy T4). OPDC is looking to restrict car parking to promote sustainable travel modes, in accordance with Policy SP7.
9. Town Centre Uses, Policy TC3	Should mention of shopmobility schemes, blue badge parking etc.	1	Greater London Authority	Noted. Car parking requirements are covered in the transport chapter (Policy T4). OPDC is looking to restrict car parking to promote sustainable travel modes, in accordance with Policy SP7.
9. Town Centre Uses, Policy TC3	The commitment to high quality accessible shopfronts is welcomed.	1	Greater London Authority	Noted.
9. Town Centre Uses, Policy TC3	Should get A-Class outlets to sign up to a community toilet scheme	1	Greater London Authority	Change proposed. The definition of social infrastructure includes public toilets. Policy TCC4 identifies that contributions will be sought towards the provision of these facilities.
9. Town Centre Uses, Policy TC5	All sports and fitness venues should be encouraged to achieve the English Federation of Disability Sports Inclusive Fitness Initiative Mark	1	Greater London Authority	Change proposed. This wording has been included in Policy TCC6.

9. Town Centre Uses, Policy TC6	Welcome the 10% accessible hotel bedrooms	2	Greater London Authority, Hammersmith and Fulham Disability Forum	Noted.
9. Town Centre Uses, Policy TC2	Should not reduce the size of Park Royal Neighbourhood Centre, beyond that in the Ealing Local Plan, as this will limit its future potential in terms of being able to provide for existing and future users and occupiers of the SIL.	1	Goodies Food Ltd	No change proposed. The Local Plan has a larger boundary than in the Ealing Local Plan. Policy TCC3 identifies that Park Royal Centre is likely to need to provide an additional 3,000sqm of A-class uses over the Plan period.
9. Town Centre Uses, Policy TC5	The mix of leisure and cultural facilities needs to meet the needs of the existing, surrounding and future populations, in being affordable (and including free activities), meeting the leisure needs of all ages and sectors of the population.	2	Grand Union Alliance, 1 resident	Noted. The policy (TCC6) references the requirement to meet needs. The policy also references that affordable access will be secured.
9. Town Centre Uses, Policy TC1	Policy should be reworded to talk about meeting the needs of existing and future residents and visitors, rather than talking about strengthening London's position as the world's cultural capital, which seems unrealistic and should not undermine meeting local needs	1	Grand Union Alliance	No change proposed. The Local Plan recognises the need for culture to meet the needs of existing and future local communities; however, given the scale of opportunity, particularly at Old Oak, OPDC considers that its important to recognise that culture and leisure facilities will also be capable of meeting a strategic need to the benefit of Londoners.
9. Town Centre Uses, Policy TC1	Point b should also include 'D class' uses	1	Grand Union Alliance	Change proposed. Wording in the strategic policies (SP5 and SP6) refers to the need to provide a range of town centre uses and the glossary definition of town centre uses incorporates D-class uses.
9. Town Centre Uses, Policy TC1	(c) propose adding in… which complement and support “existing nearby	1	Grand Union Alliance	Change proposed. Policy SP6 refers to the need for town centres uses to complement nearby town centres

	centres as well as" London's wider network of centres			
9. Town Centre Uses, Policy TC4	Additional strategic policies should include support for the retention of existing shops and services	1	Grand Union Alliance	Change proposed. The need to protect and improve existing social infrastructure is required in Policy SP4.
9. Town Centre Uses, Policy TC1	As further justification text, propose the following: 9.10 The OPDC will focus on developing human scale, healthy neighbourhoods within and around the OPDC boundary. There are existing centres that can be regenerated and serve existing and new residential areas by planning based on walkable distances. The focus of the development should not be conceptualised around the Old Oak Common station but around community hearts linked by pedestrian and cycling networks and high quality streets and spaces.	1	Grand Union Alliance	Noted. The requirement for walkable communities is reflected in policies SP2 and SP7. Policy SP6 and chapter 4 identify a series of places so the Plan is not conceptualised around the Old Oak Common station.
9. Town Centre Uses, Policy TC1	As further justification text we propose the following: Add to 9.7: The OPDC will support retail and leisure developments which provide a balanced offer across the network of centres in the OPDC area and region, and seek to ensure a significant proportion of the leisure and retail provision is affordable and/or free, meeting the needs of all ages and sectors of the population.	1	Grand Union Alliance	No change proposed. The Local Plan deals with affordable sports provision in policy TCC6. Policy TCC2 seeks to secure smaller units which would be more affordable to retailers. It would be unviable to require that sports facilities and retail provision should be free.

9. Town Centre Uses, Policy TC2	Support Policy TC2	3	Grand Union Alliance, Old Oak Park (DP9), the Hammersmith Society	Noted.
9. Town Centre Uses, Policy TC2	Should explore a different, less linear configuration to the proposed Old Oak High Street major town centre	1	Grand Union Alliance	No change proposed. The concept of a High Street linking the areas' key transport hubs is a fundamental assumption in the current masterplan and it is sensible to cluster active and high trip generating uses along this.
9. Town Centre Uses, Policy TC4	A neighbourhood centre to the north of Old Oak (near Willesden Junction) may be more appropriate to balancing the concerns regarding Harlesden. However, a more active approach to Harlesden is also seen as a potential policy direction.	1	Grand Union Alliance	Change proposed. The Retail and Leisure Needs Study and Local Plan have been updated to identify a new neighbourhood centre in this location, named 'Atlas Junction'. This has resulted from further work looking into the spatial requirements for retail provision in the OPDC area and acknowledgement of both committed and implemented schemes at Atlas Junction, which are resulting in the clustering of retail uses in this location, which can help to meet the needs of new development and address deficiencies in access to town centre uses for local communities.
9. Town Centre Uses, Policy TC2	Point 9.14 is in contradiction with the RLNS concern about the negative impact of the OO High Street on Harlesden, and also with point 9.43.	1	Grand Union Alliance	Noted. There was a contradiction in respect of Harlesden. The revised draft Local Plan makes the requirements for mitigating impacts on Harlesden clearer in the requirements for a Harlesden Enhancement Strategy, outlined in the Place policies for Old Oak South (P1) Old Oak North (P2), and Willesden Junction (P11).

9. Town Centre Uses, Policy TC2, Retail and Leisure Needs Study	The immediate needs for residents should be assessed – the retail and leisure needs study does not look at current retail and leisure patterns and offers.	1	Grand Union Alliance	No change proposed. The Retail and Leisure Needs Study assumes that current needs are being met, but the Study does look to provide a spatial distribution of centres that help to provide walkable facilities for both new and existing residents and workers.
9. Town Centre Uses, Policy TC4	Local residents should be engaged in the town centre enhancement strategy	1	Grand Union Alliance	Change proposed. The need to engage with local community groups is a requirement of the Harlesden Enhancement Strategy, as set out in Policy P2 (Old Oak North)
9. Town Centre Uses, Policy TC3	The potential should be taken to promote the distinctive ethnic offer of Harlesden, as a unique destination. This is already the case, especially for African and African-Caribbean communities	1	Grand Union Alliance	No change proposed. Harlesden Town Centre is not within the OPDC area so OPDC cannot set policies for it. However, OPDC is working closely with the London Borough of Brent and Harlesden Neighbourhood Forum who will both be producing development plan documents for the area.
9. Town Centre Uses, Policy TC3	Should have a policy looking to promote small shops and independent businesses	5	Grand Union Alliance, 4 residents	No change proposed. The requirement for small shops was included in Policy TC3 in the Regulation 18 draft Local Plan and has been included in policy TCC2 of the Regulation 19 draft Local Plan.
9. Town Centre Uses, Policy TC5	Alter policy section (d) to 'provide accessible and inclusive access for local communities in terms of age, ability/disability and income'	1	Grand Union Alliance	No change proposed. Requirements for buildings to be accessible and inclusive to all are set out in Policy D3. Policy TCC6 (Sports and Leisure) now goes further than this and requires that facilities also achieve the "Inclusive Fitness Initiative Mark" accreditation
9. Town Centre Uses, Policy TC7	Do not support alternative policy option for TC7 as it would disrupt planned residents	1	Grand Union Alliance	No change proposed. OPDC has not taken forward the alternative policy option approach in the Regulation 19 night-time economy policy (TCC11).

9. Town Centre Uses, Policy TC4	there should be more detailed investigation around the retail provision in Harlesden, the extent to which this provision services both local and wider communities, the needs of existing and neighbouring communities and what any loss would mean to them. An impact study should be produced.	1	Grand Union Alliance	No change proposed. Harlesden Town Centre is not within the OPDC area so OPDC cannot set policies for it. However, the place policies for Old Oak South (P1), Old Oak North (P2) and Willesden Junction (P11) require a Harlesden Enhancement Strategy for applications providing over 5,000sqm of town centre use floorspace, to help to mitigate any impacts on Harlesden Town Centre.
9. Town Centre Uses, Policy TC1	insert “accessible and inclusive” between “technology” and “design”. Justification: to ensure proposals comply with London Plan Policy 7.2 and inclusive environment	1	Hammersmith and Fulham Disability Forum	No change proposed. Requirements for accessible and inclusive design are set out in policies SP9 and D3. This by virtue covers all buildings.
9. Town Centre Uses, Policy TC3	TC3 Vibrancy: a) ii: insert “and inclusive” between “accessible” and “shopfronts”. Justification: it is essential to use technical terms consistently.	1	Hammersmith and Fulham Disability Forum	No change proposed. Requirements for accessible and inclusive design are set out in policies SP9 and D3. This by virtue covers shopfronts
9. Town Centre Uses, Policy TC5	new para e) provide accessible and inclusive facilities. Justification: to ensure proposals comply with London Plan Policy 7.2 and inclusive environment and Sport England Guidance etc	1	Hammersmith and Fulham Disability Forum	No change proposed. Requirements for accessible and inclusive design are set out in policies SP9 and D3. This by virtue covers sports, culture and leisure facilities. However, Regulation 19 policy TCC6 (Sports and Leisure) now goes further than this and requires that facilities also achieve the “Inclusive Fitness Initiative Mark” accreditation
9. Town Centre Uses, Policy TC6	Recommend that planning applications are also assessed against guidance on visitor accommodation and facilities in BS 8300: 2009.	1	Hammersmith and Fulham Disability Forum	No change proposed. This requirement is covered in London Plan policy 7.2 and therefore does not need repeating in OPDC's Local Plan as it already forms part of OPDC's Development Plan.

9. Town Centre Uses, Policy TC6	This policy should include a provision that wherever possible conversions, changes of use and extensions to hotels be accessible to all.	1	Hammersmith and Fulham Disability Forum	No change proposed. Requirements for accessible and inclusive design are set out in policies SP9 and D3. Policy TCC10 does identify that applications for new or expansions to existing hotels should iii. provide at least 10% of hotel bedrooms as wheelchair accessible and submit Accessibility Management Plans
9. Town Centre Uses, Policy TC4	The Retail and Leisure Needs Study discusses the importance of connecting the Old Oak area to Harlesden but the Local Plan does very little to provide these links	1	Harlesden Neighbourhood Forum	No change proposed. The Local Plan Place policy for Willesden Junction (P11) identifies the need for new connections to Harlesden to both the west and east of the station and the infrastructure requirements for these are identified in the Infrastructure Delivery Plan (IDP).
9. Town Centre Uses, Policy TC2, Figure 93	Fig 93 should show Harlesden town centre as defined in Brent's submission Development Management Policies proposed changes to the Policies Map.	1	Harlesden Neighbourhood Forum	Change proposed. The boundary has been revised to show the town centre boundary as per the Brent Development Management Policies DPD.
9. Town Centre Uses, Policy TC2	Need to define boundary for North Acton Neighbourhood Centre	1	Imperial College London	Change proposed. The Regulation 19 Local Plan and associated policies map show the boundary for North Acton Neighbourhood Centre. The boundary is only shown as indicative however, as much of the centre is yet to be built.
9. Town Centre Uses, Policy TC2, Retail and Leisure Needs Study	Concerned that the Retail and Leisure Needs Study has not adequately modelled the impacts of Crossrail	1	Ealing Council	Change proposed. The Retail and Leisure Needs Study has been updated to acknowledge that Crossrail will mean that Old Oak will be in close proximity to other centres such as Ealing and Southall. However, given the scale of these existing centres, modelling is still showing that the likely impact of the new centre hierarchy in Old Oak and Park Royal is likely to be minimal.
9. Town Centre Uses, Policy TC2	Need to set out the function and composition of the retail hierarchy	1	Ealing Council	No change proposed. The function of the retail hierarchy is set out in Policy SP6 and in the relevant place policies in the places chapter.

9. Town Centre Uses, Policy TC2	Do not support designation of Park Royal Neighbourhood Centre	1	Ealing Council	No change proposed. Park Royal Centre is an existing designated centre in Eating's local plan.
9. Town Centre Uses, Policy TC4	Question whether 5,000sqm of additional retail in Park Royal Centre is appropriate	1	Ealing Council	Change proposed. The Retail and Leisure Needs Study has been revised and now redistributes this floorspace so that some of the provision is accommodated within the new Atlas Junction Neighbourhood Centre.
9. Town Centre Uses, Policy TC4	Does not support TC4 alternative policy option	1	Ealing Council	No change proposed. The Local Plan continues to support the preferred policy option. However, the supporting text to Policy SP6 acknowledges that as the centre evolves, there may be a need to consider the designation of the centre.
9. Town Centre Uses, Policy TC5	It would be helpful to point out that these uses should not cause land supply issues particularly in relation in industrial uses.	1	Ealing Council	No change proposed. The policy requires uses to be located in a sequential manner, thus looking to avoid impact on industrial uses. The policy supports some town centre uses in the SIL, but only where they support the viability of an industrial businesses operation and where they do not have an unacceptable impact on the functioning of the Strategic Industrial Location (SIL).
9. Town Centre Uses, Policy TC6	Should direct hotel accommodation to town centres and areas of high public transport access	1	Ealing Council	No change proposed. This is a requirement of the visitor accommodation policy (now policy TCC10).
9. Town Centre Uses, Policy TC2	Point C – It is not clear whether there is going to be more than one 'town centre' The wording in point c suggests multiple town centres.	1	Hammersmith and Fulham Council	Noted. OPDC proposed to designate four town centres, in accordance with OPDC's Retail Needs Study. These are set out in Policy SP6 (places and destinations).
9. Town Centre Uses, Policy TC1	Points d, e and f are very vague in terms of policy criteria	1	Hammersmith and Fulham Council	Change proposed. There have not been included in the town centre policies in the Regulation 19 draft Local Plan, but the principles of supporting high standards of active and healthy lifestyles and supporting innovation are included in Policies SP2 and SP3.

9. Town Centre Uses, Policy TC1	Paragraph 9.8 could do with some further explanation about how the spatial distribution and uses can help promote healthy lifestyles – e.g. Walking or restricting hot food takeaways.	1	Hammersmith and Fulham Council	No change proposed. Policy TC1 has been removed from the Local Plan and the key principles from it have been amalgamated into Policy SP6. Policy TCC2 looks to control the number of takeaways, whilst policy SP7 looks to deliver healthy and walkable streets.
9. Town Centre Uses, Policy TC1	The lack of alternative options for policy TC1 seems odd. Alternative options which still involve a mix of uses could be included.	1	Hammersmith and Fulham Council	No change proposed. Policy TC1 has been removed from the Local Plan. Alternative options for the town centre hierarchy were contained in Policy TC2. No alternative options for policy TC1 were considered viable, as an alternative option could only look to not deliver town centre uses to meet needs.
9. Town Centre Uses, Policy TC1	Delete 'town' from the Neighbourhood centre classification in Figure 92 and elsewhere in the document. The Neighbourhood centre classification needs to be clearly defined.	1	Hammersmith and Fulham Council	No change proposed. A neighbourhood centre is defined as a town centre within the town centre classifications in Annex 2 of the London Plan. The policy accords with this definition.
9. Town Centre Uses, Policy TC2	"…to meet needs.." Can you clarify what you mean by need. Is it to meet the projected need for the development or local need or day to day shopping needs? Suggest amending it to say: "to meet local need generated by the development"	1	Hammersmith and Fulham Council	Change proposed. Policy SP6 clarifies that the needs being served are those of the development.
9. Town Centre Uses, Policy TC2	Object to the word 'fantastic' which is too objective.	1	Hammersmith and Fulham Council	Change proposed. This has been removed from the Regulation 19 draft Local Plan.
9. Town Centre Uses, Policy TC2	Second sentence. Should say "NPPF sequential test"	1	Hammersmith and Fulham Council	Change proposed. Policy TCC1 now references the NPPF sequential test

9. Town Centre Uses, Policy TC2	Agree that alternative option for designating a metropolitan centre at Old Oak should be dismissed	2	Hammersmith and Fulham Council, Old Oak Park (DP9)	Noted. Policy SP6 proposes that Old Oak High Street is designated as a major town centre. However, the supporting text recognises that as the centre evolves, there may be a need to consider the designation of the centre.
9. Town Centre Uses, Policy TC2	Support alternative option 2	1	Hammersmith and Fulham Council	No change proposed. OPDC considers that the preferred policy option of designating the centre is the correct policy approach to take. The Retail and Leisure Needs Study identifies the centre will be likely to accommodate 57,250sqm of a-class floorspace alone within the plan period and potentially more beyond the plan period. This does not include provision of other town centre use floorspace, such as D1 and D2 uses. This comfortable places the centre within the definition of a major town centre, as defined in Annex 2 of the London Plan.
9. Town Centre Uses, Policy TC2	The categorisation of the Old Oak High Street Centre should be reviewed as the centre establishes itself. If categorisation is necessary, then this should begin at a level more akin to the initial phasing of the development e.g. 5-10 years. 5-10 years	1	Hammersmith and Fulham Council	Noted. OPDC considers that setting the planned hierarchy for this centre now is beneficial since it allows for the management of place-making and regeneration expectations and ensures that the provision of town centre uses are aligned with the planned number of homes and jobs. It allows for both the OPDC Local Plan and those of neighbouring authorities to plan for the consequences of a new centre. However, OPDC notes that the scale of the centre and range of supporting A-class uses it provides might result in the centre according more with the classification of a metropolitan centre over time and that future reviews of the designation will be necessary.
9. Town Centre Uses, Policy TC2	We support the approach used to sequential and impact testing and the proposed thresholds	1	Hammersmith and Fulham Council	Noted.

9. Town Centre Uses, Policy TC2	The policies appear to be drafted to assess what is appropriate in town centres and there is nothing specific for the neighbourhood centres.	1	Hammersmith and Fulham Council	No change proposed. Neighbourhood centres are town centres, in accordance with annex 2 of the London Plan.
9. Town Centre Uses, Policy TC3	Point a) 1. Tables and chairs on the public highway (footpath) may need to be separately considered from a highways perspective. Signposting or cross referencing with relevant transport policy would be useful.	1	Hammersmith and Fulham Council	Change proposed. Policy TCC2 references the need for outdoor seating etc to not detract from transport connectivity.
9. Town Centre Uses, Policy TC3	Point c) could contradict point d)	1	Hammersmith and Fulham Council	No change proposed. OPDC still proposes to ensure that a certain proportion of A-class uses are small units, which are attractive to independent retailers.
9. Town Centre Uses, Policy TC3	Need to define what meanwhile uses are	1	Hammersmith and Fulham Council	no change proposed. Meanwhile uses are defined in the glossary.
9. Town Centre Uses, Policy TC4	Point 3. Complementing other centres should not be triggered by quantum, it should be done regardless of whether the proposal exceeds need. 9.43 says larger proposals. Can you clarify what you mean by larger? Remove text from 'where' onwards in point 3.	1	Hammersmith and Fulham Council	Noted. The key issues section has been removed from the Regulation 19 draft Local Plan.
9. Town Centre Uses, Policy TC4	Put projected needs table in supporting text and make it clear that the figures are indicative.	1	Hammersmith and Fulham Council	Change proposed. The needs table has been included in the supporting text, but cross-referred to in the policy and developers are required to have regard to the recommended distribution of floorspace across the area.
9. Town Centre Uses, Policy TC5	Support Policy TC5	2	Midland Terrace Resident's Group, Old Oak Park (DP9)	Noted

9. Town Centre Uses, Policy TC6	Support Policy TC6	3	Midland Terrace Resident's Group, Old Oak Park (DP9), SEGRO	Noted
9. Town Centre Uses, Policy TC7	Question the need for a policy that gets into the detail of closing times for premises, to be applied across the whole of the OPDC area. The hours of operation should be set differently in different places	1	Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. The policy approach recognised the need for variance inside and outside of town centres and also allows for flexibility in the approach, subject to their being no detrimental harm to the amenity of neighbours and subject to cumulative impacts being adequately considered.
9. Town Centre Uses, Policy TC5	It is hard to see how the OPDC could ensure sub-paragraph d) through planning policies	1	Old Oak Interim Forum	No change proposed. Affordable access to sports facilities would be secured through a S106 agreement
9. Town Centre Uses, Policy TC5	Local residents would welcome a cultural facility or academic body with an arts bias given that Imperial College are now providing a strong science, engineering and bio-technology presence on the area.	7	Old Oak Interim Forum, Midland Terrace Resident's Group, Wells House Road Residents Association, 6 residents	Noted. Policy TCC5 and TCC8 support the provision of these facilities. The Employment chapter supports the provision of science and engineering facilities
9. Town Centre Uses, Policy TC6	Those using business hotels and conference facilities often barely connect with the surrounding neighbourhood and may contribute little to the area	1	Old Oak Interim Forum	No change proposed. Business hotels provide important facilities to support local businesses and also provide employment for local people.

9. Town Centre Uses, Policy TC2	for the sake of clarity we consider the policy should state that there is a need and in principle support for a new major centre of circa 50,000 sq m Class A use, subject to impact testing.	1	Old Oak Park (DP9)	No change proposed. The potential for a major centre is reflected in policy SP5. The scale of the size of this centre would be contingent on the needs arising from development, but Policy TCC3 states that regard should be had to the up to date retail needs study and recommended distribution of A-class floorspace. This currently identifies a need based on current population projections for 57,250 sqm of A-class floorspace in Old Oak High Street town centre.
9. Town Centre Uses, Policy TC2	Should clearly define the centre boundary for Old Oak High Street and include primary shopping areas	1	Old Oak Park (DP9)	No change proposed. As the centre is not yet established and fundamental issues such as the alignment of the High Street are not yet fixed, OPDC considers it would be inflexible to set a boundary at this stage. Policy SP7 states that primary shopping areas should be focussed directly onto the High Street at and rail stations and intersections with major routes such as Park Road and Grand Union Street.
9. Town Centre Uses, Policy TC4	Should be clearer in the Local Plan regarding the phasing of the delivery of the High Street	1	Old Oak Park (DP9)	Change proposed. Policy TCC3 requires the delivery of A-class uses to be phased so that they are delivered in accordance with the demand created by new homes and jobs.
9. Town Centre Uses, Policy TC2	Consider that it inappropriate to protect out of centre town centre uses	1	Old Oak Park (DP9)	No change proposed. OPDC considers that out of centre town centre uses can provide important walk-to services. However, the loss of such facilities would be supported where they are no longer viable can be reprovided or the facility is giving rise to unacceptable impacts on residential amenity or on the transport network.

9. Town Centre Uses, Policy TC2	the wording should be amended to require an impact assessment for any scale of development in excess of that which has already been tested in the Retail and Leisure Needs Study, and the policy should make clear that any impact assessment should be undertaken in the context of the policy requirement to meet the need for this scale of development in this area.	1	Old Oak Park (DP9)	No change proposed. The justification for requiring an impact assessment at the thresholds set out is articulated in the Retail and Leisure Needs Study. The study identifies that as the centre is not yet in existence, there is a need for greater scrutiny of proposals, particularly larger scale proposals, which could impact more greatly on established town centres.
9. Town Centre Uses, Policy TC2	Alternative Option 2 has some merits but may not accommodate scale of development needed, placemaking, and creating effective linkages	1	Old Oak Park (DP9)	No change proposed. OPDC agrees that option 1 is the preferable and that option 2 would not realise place-making benefits, particularly in Old Oak South, which will provide a substantial amount of new homes, a new commercial centre and will also need to meet the needs of approximately 250,000 people per day interchanging within the Old Oak Common station.
9. Town Centre Uses, Policy TC2	Do not support alternative policy option 3, as consider that the town centre should be focussed to the north of the canal	1	Old Oak Park (DP9)	No change proposed. OPDC agrees that option 3 would not be appropriate. However, OPDC considers that the town centre should not be focussed to the north of the Grand Union Canal as a significant need for town centre uses will arise from development in Old Oak South and other places to the west, such as Old Oak Lane and Old Oak Common Lane.
9. Town Centre Uses, Policy TC3	Support Policy TC3	1	Old Oak Park (DP9)	Noted.
9. Town Centre Uses, Policy TC4	Support Policy TC4	1	Old Oak Park (DP9)	Noted.

9. Town Centre Uses, Policy TC4	Figures should not be taken as a cap, and that additional floorspace may be appropriate subject to impact and other considerations.	1	Old Oak Park (DP9)	No change proposed. The figures are not set as a cap as the figures are based on current estimates of need based on expenditure patterns and assumptions around quantums of homes and jobs delivered. However, Policy TCC3 does require development to have regard to up to date retail and leisure needs study for the OPDC area including the recommended distribution of A-Class uses across the area and the delivery of A-class uses to be phased so that they are delivered in accordance with demand created by the delivery of homes and jobs.
9. Town Centre Uses, Policy TC4, Retail and Leisure Needs Study	This figure excludes the potential needs arising from the transport interchange, and we consider that there is the potential to retain a higher proportion of locally generated comparison goods spend than the 15-25% range tested in the RLNS.	1	Old Oak Park (DP9)	No change proposed. The Retail and Leisure Needs Study includes an assumed need for people interchanging within the station. This amounts to 7,500sqm and is included within the floorspace figures for Old Oak High Street centre.
9. Town Centre Uses, Policy TC5	Should make it clear that affordable access would not be provided to all facilities but that there will be an expectation that some are affordable whereas others are run on a commercial basis	1	Old Oak Park (DP9)	Change proposed. The policy wording has been altered to include 'where appropriate' to recognise it might not be appropriate to secure affordable access to all facilities.
9. Town Centre Uses, Policy TC7	Policy TC7 should positively support the evening night time economy, and proposals which add vibrancy and should avoid a blanket approach to limiting night time economy uses	2	Old Oak Park (DP9), 1 resident	No change proposed. The supporting text recognises the positive impact that the night-time economy has on London's economy and to supporting the vibrancy and vitality of town centres. The policy does not take a blanket approach and allows for extended hours subject to certain policy criteria being met.

9. Town Centre Uses, Policy TC2, Retail and Leisure Needs Study	the RLNS could consider in more detail the complementary roles of retail uses serving the new Old Oak Station, and wider retail needs to be met in rest of the town centre	1	Old Oak Park (DP9)	No change proposed. The Retail and Leisure Needs Study already acknowledges this. Wording is also included in Old Oak South acknowledging that town centre uses here can help to meet the needs of those interchanging.
9. Town Centre Uses, TC4	Satisfied with proposed quantum of A-class floorspace	1	Royal Borough of Kensington and Chelsea	Noted.
9. Town Centre Uses, TC2	Believe that OPDC has put in place adequate safeguards to ensure that the proposed major centre at Old Oak does not cause harm to nearby town centres	1	Royal Borough of Kensington and Chelsea	Noted.
9. Town Centre Uses, TC4	There appears to be a conflict between Preferred Policy Option TC2 (Town centre hierarchy) (d)(i) which states that the "OPDC will require developers to submit an impact assessment for schemes… providing over 5,000 sqm of town centre use in the Old Oak High Street Major Centre" and Preferred Policy Option TC4 (A-Class needs) which only requires the demonstration that viability and viability of nearby centres would not be adversely affected, where "proposals would exceed the quantitative need." Would strongly support the former	1	Royal Borough of Kensington and Chelsea	Change proposed. The requirements set out in Policy TC4 have been removed to aovid this anomaly.
9. Town Centre Uses, Cultural Principles Study	Support Cultural Principles Study	3	The Hammersmith Society, 2 residents	Noted.

9. Town Centre Uses, Policy TC3, Cultural Principles Study	Support requirement for schemes providing over 2,500sqm to submit a Cultural Action Plan	1	The Hammersmith Society	Noted.
9. Town Centre Uses, Policy TC3, Cultural Principles Study	The principle of providing or contributing to public art should also be considered as an obligation.	1	The Hammersmith Society	Change proposed. Contributions to public art are now being sought through Policy TCC5.
9. Town Centre Uses, Policy TC7	Support Policy TC7	1	The Hammersmith Society	Noted.
9. Town Centre Uses, Policy TC2	The policy approach to protect existing edge or out of centre town centre uses is supported.	1	Westkite Ltd	Noted.
9. Town Centre Uses, Policy TC2	Where such developments are ancillary to residential led development the need for sequential assessments should be relaxed.	1	Westkite Ltd	No change proposed. OPDC supports the town centre first approach and to relax the requirement for a sequential approach to locating town centre uses would undermine the delivery of OPDC's town centre hierarchy.
9. Town Centre Uses, Cultural Principles Study	There is a lack of focus on arts subjects in schools which is preventing people from pursuing careers in the arts	1	1 Resident	Noted. This is not a direct planning issue. OPDC are looking to protect and provide new artist studios through the requirements of policies E1, E2, E3 and TCC5.
9. Town Centre Uses, Policy TC4, Retail and Leisure Needs Study	Query whether too much retail was being proposed and whether it would be viable	1	1 Resident	No change proposed. The level of retail is based on current population projections and detailed modelling of expenditure and catchments set out in OPDC's Retail and Leisure Needs Study.
9. Town Centre Uses, Policy TC4	Support for convenience stores	2	2 Residents	Noted.

9. Town Centre Uses, Policy TC3	Should have a policy to support affordable shops	1	1 Resident	No change proposed. OPDC does not explicitly require the provision of affordable shops. OPDC's Retail and Leisure Needs Study notes that in spite of affordable shops policies, there are no examples of where they have been appropriately secured and that therefore a better approach to take would be to look to secure a certain proportion of small units, which would by virtue be more affordable and more suitable for independent retailers. These requirements have been incorporated into Policy TCC2.
9. Town Centre Uses, Policy TC3	Support potential for farmers' market in Old Oak	1	1 Resident	Noted. Any proposal for a farmers market would need to be accompanied by a management plan, in accordance with Policy TCC2.

10. Social Infrastructure

Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
10. Social Infrastructure, SI1	Social infrastructure should be integrated throughout the development and secured on-site within each phase of development, including earlier phases. Development should knit together and used by new and existing residents and employees together.		London Borough of Brent, Diocese of London, Midland Terrace Residents Association, Old Oak Interim Forum, workshop	Change proposed. Wording has been inserted in the social infrastructure policy (TCC4) referencing the need to locate social infrastructure in locations easy to get to for both existing and future communities, in order to support the integration of communities.
Social Infrastructure, SI2	There is not sufficient capacity to extend existing primary schools in Brent to meet additional demand. If it is proposed that social infrastructure will be delivered off site this must be backed up by evidence that existing facilities can be extended and supported by providers.		London Borough of Brent	Noted. OPDC has undertaken an Education and Health Study to understand the capacity of existing schools to expand and this has informed OPDC's Infrastructure Delivery Plan (IDP)
Social Infrastructure, SI1	Support for the safeguarding of existing social infrastructure. The policy should provide clear criteria on when this should happen, this could include consideration of consultation, alternative provision, vacancy/marketing info, reuse, wider programme/delivery strategy.		London Borough of Brent, Old Oak Park (DP9)	Change proposed. Wording has been added clarifying that it would only be acceptable where evidence is provided that the facility is no longer required due to the provision of new social infrastructure facilities serving the same population or that the facility is re-provided on the same site or in the vicinity

Social Infrastructure, SI3	Support for healthy new town concept.		London Borough of Brent, Midland Terrace Resident's Group, Old Oak Park (DP9), LSDC	Noted. OPDC was unsuccessful in its bid to become an official 'Healthy New town' but still plans to drive high standards for health and well being in the planning of development for the area.
Social Infrastructure, SI1	Support approach in SI1 and objective to knit new and existing together residents and employees.		Diocese of London, Midland Terrace Resident's Group, Old Oak Interim Forum, Old Oak Park (DP9), Royal Borough of Kensington and Chelsea, The Hammersmith Society, Local resident,	Noted
Social Infrastructure, SI1	Planning for places of worship should be included as a social infrastructure policy theme, references to this in Plan and evidence base is very limited. Approach could be more positive and include the preparation of Supplementary Planning Document on procuring social infrastructure. There are also some distinct characteristics in terms of the design of places of worship.		Diocese of London	No change proposed. This is included under the definition for social infrastructure. Development proposals would be expected to provide space for places of worship.
Social Infrastructure, SI1	Support for requirements on the location, design and co-location of social infrastructure.		Diocese of London, QPR (NQP	Noted

			Development Services), LBE	
Social Infrastructure, SI1	Requiring new social infrastructure to be provided solely on-site rather than looking to expand surrounding existing facilities (as in the alternative policy option) may leave these sites feeling isolated in early years.		Diocese of London	No change proposed. The Reg 19 Local Plan does not proposed that all social infrastructure should be provided on-site. A combination of on and off-site social infrastructure provision will be required. Social infrastructure requirements ae outlined in OPDC's Infrastructure Delivery Plan (IDP).
Social Infrastructure, SI1	Would like more information and guidance on how items of social infrastructure will be secured through the planning (s106 SPD) and land disposal process		Diocese of London	Noted. This information is now outlined in greater detail in OPDC's Policy SP10 and in the Delivery and Implementation chapter and accompanying Infrastructure Delivery Plan (IDP). OPDC will also be developing a Planning Obligations (s106) Supplementary Planning Document
Social Infrastructure, SI1, SI3	Concerned about the existing loss/deficiency of infrastructure around the OPDC area and whether there will be sufficient infrastructure/capacity to support the anticipated population, particularly local police and fire services, GPs, hospital care facilities, and whether this has been taken into account in the evidence. Existing social infrastructure is truggling, should be protected and enhanced; and new infrastructure should be provided.		Grand Union Alliance, Andy Slaughter MP, The Hammersmith Society, workshop, workshop, local resident, Midland Terrace Resident's Group, Old Oak Interim Forum, Hammersmith Society, workshop	Noted. OPDC can only plan for land within its area. However, the Local Plan identifies that there is a need to work closely with service providers to understand needs. OPDC would only allow facilities in its area to be lost if the site is no longer required due to the provision of new social infrastructure facilities serving the same population, in accordance with Policy TCC4

Social Infrastructure, SI1	The required levels of social infrastructure as well as affordable housing must be secured.		Grand Union Alliance	Noted. This is set out in the social infrastructure policies (SP4, TCC4) and affordable housing policies (H2) in the Local Plan
Social Infrastructure, SI1	Funding and management arrangements for social infrastructure must be secured and clarified. Ongoing revenue and maintenance should be able to funded through the relevant local and national budget and/or providers. It can be challenging to fund projects and find providers.		Grand Union Alliance, Old Oak Park (DP9), The Hammersmith Society	Change proposed. The new social infrastructure policy references working with stakeholders to consider maintenance and management funding. OPDC's Reg 19 Local Plan is also supported by an Infrastructure Delivery Plan (IDP).
Social Infrastructure, SI1, SI2, SI3	Should refer to: 'accessible and inclusive design' in the policy.		Hammersmith and Fulham Disability Forum	No change proposed. The need for all facilities to be accessible and inclusive is covered in Policy D3.
Social Infrastructure, SI1	There are strong synergies between historic buildings and successful cultural or community uses. Historic buildings, such as the Rolls Royce building, or other smaller but distinctive elements of the local heritage, could be reused in this way.		Historic England	Noted. OPDC's Heritage Strategy has identified buildings within the OPDC area of particular merit as heritage assets. These are informing OPDC's future designations of conservation area and OPDC's Local List. OPDC's place policies also identify these heritage features and require developments to appropriately conserve these assets and respond to their heritage.
Social Infrastructure, SI1	Plan should highlight advantages of co-location with housing		London Borough of Ealing	Noted. OPDC agrees in part but this largely depends on the type of social infrastructure. OPDC requires that the infrastructure is located and phased to meet the needs of development, which is considered sufficient policy hook to negotiate on a case by case basis.

Social Infrastructure, SI1	Plan should highlight advantages of co-location as a component in delivering active frontage.		London Borough of Ealing	Change proposed. Colocation has been included as a criteria in Policy TCC4
Social Infrastructure, SI1	LFB support improvements to London's infrastructure, and willing to provide support and guidance to boroughs, developers and contractors.		London Fire Brigade	Noted. Emergency service provision is included within the definition of social infrastructure in Policy TCC4
Social Infrastructure	Support policies		Old Oak Park (DP9)	Noted
Social Infrastructure, SI1	The needs of the residents should be met by new facilities within the area to avoid unnecessary strain on existing infrastructure.		RBKC	Change proposed. OPDC is working with local service providers to understand current provision. OPDC cannot require development to fund infrastructure required to meet existing deficiencies but OPDC can look to secure facilities to meet existing deficiencies where grant funding and land are available and if the facility can be located appropriately to serve existing communities.
Social Infrastructure, SI1	Shops should be considered as social infrastructure		Workshop, workshop	Change proposed. Certain shops such as post offices have been referenced as being forms of social infrastructure. The requirements for retail are set out in Policies TCC1, TCC2 and TCC3.
Social Infrastructure, SI1	Question the longevity of social infrastructure - whether it will remain over time		Workshop	Noted. Policy SP4 requires social infrastructure to serve the needs of development. To ensure this is the case, the application of the policy would require that facilities are provided in perpetuity or for an appropriate time period

Social Infrastructure, SI1	Not sure what is meant by police shop and emergency services		Workshop	Noted. Emergency services includes fire, police and ambulance services. Further clarity on the types of social infrastructure is included in the supporting text to policy TCC4.
Social Infrastructure, SI1	Waste facilities should be considered as social infrastructure		Workshop	No change proposed. Waste facilities are considered to be a form of utilities and are covered by the environment and utilities chapter.
Social Infrastructure, SI1	CCTV was seen as an important preventative measure		Workshop	Noted. Requirements for CCTV are covered in the streets and public realm policy (D2) of the Design chapter
Social Infrastructure, SI1	Should not involve the closure of hospitals and services should be reinstated in order to ensure their is enough provision for local people and context		Local resident, local resident	Noted. Policy TCC4 requires that facilities are protected unless there is no longer identified need for the facility. The onus would be on the applicant to demonstrate that the site is no longer required due to the provision of new social infrastructure facilities serving the same population.
Social Infrastructure, SI1 and SI4	To support a high quality of life and support community development, there should a wide range of local amenities, suggestions include good quality schools, healthcare, open space, shops, air quality and culture, play areas for children, youth facilities, churches, libraries, community centres and multi-use buildings, multi-youth theatre or entertainment space.		Local resident, local resident, workshop, workshop, workshop, workshop, workshop, workshop, Hammersmith and Fulham Historic Buildings Group	Noted. These issues are all covered in the Reg 19 local Plan

Social Infrastructure, SI1	Can co-locate social infrastructure facilities with a football stadium, example given is Minerva Health Centre at Preston North End's ground. QPR in the Community Trust already works in health, education and inclusion in the OPDC area.		QPR (NQP Development Services)	Noted. Policy TCC4 requires colocation of social infrastructure where appropriate and feasible.
Social Infrastructure, SI1	Propose additional policy relating to the needs of children and young people. Spaces should be publically accessible, free to use and large enough to play sport and training facilities. OPDC should involve children and young people at the early stages.		Grand Union Alliance	No change proposed. Youth space is covered within the definition of social infrastructure, as are halls for hire (see policy TCC4). Play provision is covered in the Design chapter (D10).
Social Infrastructure, SI5	Need to reference paragraph 70 of NPPF which recognises public houses as community facilities and requires positive planning for their provision		London Borough of Brent	No change proposed. The policy already includes sufficient reference to public houses being community facilities without it being considered necessary to include a direct reference to the relevant paragraph of the NPPF
Social Infrastructure, SI5	An additional policy criteria is needed to ensure any proposed alternative uses for pubs would not detrimentally affect character of the area and building. The policy could also refer to their distinctive townscape qualities.		London Borough of Brent	Change proposed. This reference has been included in the pubs policy (TCC7).

Social Infrastructure, SI5	In line with CAMRA guidance, applicants should be required to demonstrate they have considered diversification options, including complementary uses, to enable/support the retention of the public house.		London Borough of Brent	Change proposed. The policy (TCC7) has been amended to require marketing on the premises for a period of 24 months and that diversification options have been properly explored.
Social Infrastructure, SI5	Support for the protection of pubs		London Borough of Brent, GUA, Historic England, Midland Terrace Resident's Group, The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group	Noted.
Social Infrastructure, SI5	Needs to be stronger protection for pubs, the policy tests (marketing and viability) are not strong enough to prevent conversion to residential use. Use of Article 4 Directions should also be considered.		Midland Terrace Resident's Group, The Hammersmith Society	Change proposed. The policy on protecting pubs has been strengthened to include clearer marketing requirements, exploration of diversification options and impact on character and viability
Social Infrastructure, SI5	There should be support for new pubs/areas of community focus		The Hammersmith Society, workshop	Noted. This was covered in the Reg 18 Local Plan and is included in the Reg 19 local plan
Social Infrastructure, SI5	The Fisherman Arms is an underused pub in an area which needs to change.		workshop	Noted. OPDC would welcome proposals that would increase the use if the pub, so long as they accord with the policies in the Local Plan
Social Infrastructure, SI4	SI4 largely repeats policy SI1.		London Borough of Brent	Change proposed. The social infrastructure policies have been merged into one policy in the Reg 19 local plan

Social Infrastructure, SI4	Community facilities should be provided to support existing population as well as the new population.		GUA, NHS London Healthy Urban Development Unit	Noted. The Policy TCC4 requires that existing facilities are protected or retained, subject to a continuing need
Social Infrastructure, SI4	Policy should be updated to refer to the need for publically accessible facilities; to promote a sense of community ownership and engagement; and multi-use.		GUA	Noted. Community ownership of assets is covered in Policy DI3. Multi-use is covered through the requirements for co-location in TCC4.
Social Infrastructure, SI4	Policy should refer to high quality accessible and inclusive		Hammersmith and Fulham Disability Forum	No change proposed. The requirement for all buildings to be accessible and inclusive is set out in policy D3.
Social Infrastructure, SI4	Support policy SI4		Midland Terrace Resident's Group, NHS London Healthy Urban Development Unit, Old Oak Interim Forum, Old Oak Park (DP9)	Noted
Social Infrastructure, SI4	It may be desirable to locate such facilities at 'key destination points within the OPDC area' but this is likely to be unrealistic due to higher costs. Secondary locations should not be prohibited.		Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. Policy TCC4 has been amended to require health facilities to be within or close to designated town centres, which provides for a greater degree of flexibility in terms of locations. The places chapter identifies the required site locations for the health facility requirements identified in OPDC's Health and Education Study

Social Infrastructure, SI1, SI2, SI3	The infrastructure provided should meet/be linked to the needs and numbers of people/households in the local population, and be developed in discussion with stakeholders including boroughs.		Local resident, local resident, workshop, workshop, workshop, Midland Terrace Residents Group, workshop	Noted. This requirement was covered in the Reg 18 draft Local Plan and continues to be in the Reg 19 draft Local Plan
Social Infrastructure, SI4	The Plan should make strong reference to the fact that community buildings must be low cost to hire and the design should be subject to consultation with residents and organisation.		Local resident	Change proposed. Policy TCC4 states that OPDC will work with service providers and other stakeholders to identify funding sources for the long-term management and maintenance of social infrastructure and where necessary and viable, securing contributions towards this from development proposals. This is in order to ensure that social infrastructure is affordable. Any applications for community facilities would need to undergo public consultation with the local community.
Social Infrastructure, SI4	Plan should identify need for local arts centre		Local resident	Policy TCC5 supports the provision of new culture and arts facilities and requires larger proposals to submit a Cultural Action Plan, which could include a local arts centre.
Social Infrastructure, SI4	Should include interfaith facilities		Workshop	Noted. Places of worship are identified as a type of social infrastructure in Policy TCC4.
Social Infrastructure, SI1	Community identity is also important		Workshop	Noted. The Local Plan policies recognise the importance of community identity. Policy DI3 recognises the need to work with the community in the delivery of the Local Plan

Social Infrastructure, SI1	Community safety measures such as neighbourhood watch are important		Workshop	Noted. Neighbourhood Watch is not a planning issue but the Design chapter's public realm policy (D2) includes requirements to support designing out crime
Social Infrastructure, SI4	Community facilities could provide for a range of activities. Suggestions include sports (snow boarding, pitches, sports/gymnastic/dance studios), leisure/recreation (video gaming, bars, restaurants, coffee shops, theatres, cinema) and nurseries.		Workshop	Noted. Policies TCC4, TCC5 and TCC6 deal with these sorts of facilities and support their provision subject to certain criteria being met
Social Infrastructure, SI4	Community facilities should be places where people mix, there are places where people can meet/come together		Workshop	Change proposed. This is recognised in the supporting text to Policy TCC4.
Social Infrastructure, SI4	Provision should be free or cheap and safe		Workshop	Noted. Policy TCC4 states that OPDC will work with service providers and other stakeholders to identify funding sources for the long-term management and maintenance of social infrastructure and where necessary and viable, securing contributions towards this from development proposals, to ensure facilities are affordable.
Social Infrastructure, SI4	Facilities should be indoor, physical/static facilities (rather than mobile/travelling ones) are important		Workshop	Change proposed. Facilities such as health facilities, community facilities and schools would be expected to be indoors. Facilities would also be expected to be permanent, although there may be a need for temporary or meanwhile facilities in early phases. Outdoor sports provision would also be supported where it accords with other local plan policies.

Social Infrastructure, SI4	Should be a lots of centres rather than one large facility		Workshop	Noted. The approach to providing social infrastructure has been determined through conversations with service providers. However, OPDC would need to be satisfied that needs are being met by any proposal and this includes ensuring that facilities are easy to get to for residents and workers.
Social Infrastructure, SI4	Suggestion to have open spaces where pop up shops can go		Workshop	Noted. The Local Plan includes policies requiring open space provision and Policy TCC9 supports the provision of meanwhile uses. Temporary uses for less than 28 days do not require planning permission.
Social Infrastructure, SI4	The Linford Christie Centre should be redeveloped		Workshop	Noted. This is not within the OPDC area and OPDC cannot set policy for this site
Social Infrastructure, SI4	Support for multi-use concept		Workshop, workshop, workshop	Noted. Policy TCC4 supports the colocation of social infrastructure facilities
Social Infrastructure, SI4	Local provision for places of worship is already under used and not within Old Oak and Park Royal Development Corporation's remit		Workshop	No change proposed. OPDC's Local Plan proposes to support the provision of new places of worship, where these accord with the requirements of Policy TCC4.
Social Infrastructure, SI4	There should be urban farms and allotments		Workshop	Change proposed. Policy SP8 supports this form of green infrastructure.
Social Infrastructure, SI4	There should be facilities/activities or voluntary work for young people, these should include crèche, nurseries, children's centres, and those at primary school age.		Workshop (x3)	Noted. These are covered under the definition of social infrastructure, which are supported subject to the criteria in Policy TCC4 being satisfied.

Social Infrastructure, SI4	Youth facilities should be in busier, overlooked areas		Workshop	Noted. Indoor youth spaces are covered within the definition of social infrastructure facilities and Policy TCC4 requires that these are located within or in close proximity to town centres or clusters
Social Infrastructure, SI4	Facilities where young people can live and socialise should be included in the plans		Workshop	Noted. These requirements are covered in the housing and town centre and community uses chapters
Social Infrastructure, SI4	Support for health oriented community facilities		Workshop	Noted. This is covered in Policy TCC4
Social Infrastructure, SI4	TCPA has guidance on placemaking and how to make an environment healthy		Workshop	Noted. The Local Plan includes a series of policies aimed at improving the health and well-being of new and existing residents and workers in the OPDC area (see policy SP3)
Social Infrastructure, SI4	Facilities should be community focussed and free to use/access. They could be run and managed by the community (i.e. Community Trust model).		Workshop, workshop	Change proposed. The supporting text to Policy TCC4 references the potential for community ownership and management of assets as a potential approach to the management of social infrastructure. This is also covered in Policy DI3.
Social Infrastructure, SI4	Facilities could be phased so that they are provided initially and then extended over the course of the development.		Workshop	Noted. OPDC agrees that this is one way that infrastructure could be provided. The exact approach would be the matter for detailed S106 negotiations or consideration of infrastructure provision though and OPDC considers that it is not appropriate to set out a strict approach in policy
Social Infrastructure, SI4	There used to be facilities provided by employers/employment uses		Workshop	Noted. OPDC would support new facilities being provided by employment uses, subject to them satisfying the policies in the Local Plan

Social Infrastructure, SI3	Should include community nursing and therapies, diagnostics and public health services and/or ensure that the list is not limited to those services currently listed.		London Borough of Brent	Noted, the definition under Policy TCC4 has been broadened out to include specialised care
Social Infrastructure, SI3	It is proposed that health supervision should also be linked to the employment section and be included in terms of meeting new jobs targets.		Grand Union Alliance	Noted. The jobs target arrived at from the Development Capacity Study assumes jobs being provided across a variety of employment sectors, including service sectors
Social Infrastructure, SI3	Recommend early consultation with key stakeholders to ensure premises are accessible and inclusive.		Hammersmith and Fulham Disability Forum	Noted. Policy D3 requires that premises are accessible and inclusive. Any proposal would require planning permission and would need to undergo public consultation
Social Infrastructure, SI3	Support for the establishment and growth of national and international health institutions in the OPDC area.		Midland Terrace Residents Group, Old Oak Interim Forum	Noted
Social Infrastructure, SI3	Welcome Policy Option SI3 on health.		HUDU, Old Oak Interim Forum, Old Oak Park (DP9)	Noted
Social Infrastructure, SI3	Recommend the preparation of a Phasing and Investment Study and use of the HUDU Planning Checklist or a similar tool to ensure health impacts are addressed.		HUDU	Noted. This work has been undertaken as part of Education and Health Study, which is informing the requirements for on-site health facility requirements in OPDC's Infrastructure Delivery Plan
Social Infrastructure, SI3	DIFS should assess the impact on secondary (as well as primary) healthcare and take into account relevant NHS and CCG strategies, the locations of identified 'hub' centres which may serve the area, as these will influence the pattern		HUDU	Noted. This work has been undertaken as part of Education and Health Study which has informed OPDC's on-site health facility requirements in the Local Plan's place policies and in the Infrastructure Delivery Plan

	and timing of new health care provision in OPDC area.			
Social Infrastructure, SI3	Clarification of healthy new town status required.		Old Oak Interim Forum	Noted. OPDC was unsuccessful in its bid to become an official 'Healthy New town' but still plans to drive high standards for health and well-being in the planning of development for the area, in accordance with Policy SP3.
Social Infrastructure, SI5	Suggest a new Mitre Pub on the Canal		Hammersmith and Fulham Historic Buildings Group	Noted. The Retail and Leisure Needs Study identifies a quantitative need for new A3, A4 (pubs) and A5 space. OPDC will support proposals for new pubs, subject to them according with the policies in the Local Plan.
Social Infrastructure, SI2	Worried that there is no room for expansion of the existing schools to meet additional demand from Old Oak. Policy section (b) should acknowledge this and identify other ways of addressing short/medium term needs. If it is proposed that social infrastructure will be delivered off site evidence must be provided to identify potential sites and sufficient capacity.		London Borough of Brent, Grand Union Alliance	Noted, OPDC is working with local service providers to identify the ability or otherwise for existing facilities to be expanded. This has informed the Infrastructure Delivery Plan, which is cross-referenced in Policy TCC4

Social Infrastructure, SI2	Should identify/safeguard site for school(s), they have a high land take and this might be challenging to accommodate as certain parts of the area are dominated by rail infrastructure.		London Borough of Brent, Hammersmith Society, workshop	Noted. This is now included within the Infrastructure Delivery Plan and relevant place policies (P1, P2 and P7), which is cross-referenced in Policy TCC4.
Social Infrastructure, SI2	In S12 Education insert 'providers' after landowners and developers.		Diocese of London	Change proposed. The new policy TCC4 refers to working with service providers.
Social Infrastructure, SI2	Sensible to have the primary schools near to stations and bus routes.		Diocese of London	Change proposed. OPDC's Education and Health Study has assessed the ability of sites to deliver schools to derive the most appropriate sites for delivery, in order to allocate sites. The locations are identified in the places chapter and Infrastructure Delivery Plan IDP). Policy TCC4 requires that education facilities in areas within easy reach by foot, cycle and public transport and close to areas of open space
Social Infrastructure, SI2	Consider that the school may be needed earlier than is suggested in the Plan.		Diocese of London	Noted. More detailed work has been undertaken to explore the phasing of development and requirements for schools provision as part of the Education and Health Study. This work has informed the Infrastructure Delivery Plan and allocated sites for delivery in the places chapter.
Social Infrastructure, SI2	A site within Old Oak North would be a good location or, alternatively, a site adjacent to the canal in the northern part of Old Oak South. These would need good connections across the canal. The imperative must be to identify the best location for the all-through		Diocese of London	Noted. OPDC has undertaken an Education and Health Study to inform the Infrastructure Delivery Plan and allocated sites for school delivery. This looks to optimise the location of the school provision based on phasing and the need for the facility to be accessible and accompanied by appropriate ancillary facilities.

	school regardless of land ownership.			
Social Infrastructure, SI2	The site area in the DIFS is 1.5ha which seems small if the area for a primary schools is 0.5ha.		Diocese of London	Noted. OPDC has undertaken a more detailed Education and Health Study, which supersedes the DIFS and informs OPDC's Infrastructure Delivery Plan. This is based on the most up-to-date design guidance.
Social Infrastructure, SI2	The preferred policy option should ensure that all new schools are fully accessible and allow access to all areas of the curriculum. Reference should be made to the relevant Building Bulletins.		GLA	Change proposed. The building bulletins are now referred to in the supporting text to Policy TCC4.
Social Infrastructure, SI2	Strong support for the development of both further and higher education in the OPDC area.		Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum	Noted.
Social Infrastructure, SI2	Sufficient education infrastructure must be developed to accommodate both existing and new need.		Grand Union Alliance	Noted. OPDC will secure the delivery of infrastructure to mitigate the impacts of development. With regard to existing deficiencies, OPDC is working with service providers to identify needs. Any delivery of infrastructure is likely to be dependent on grant funding.

Social Infrastructure, SI2	This policy should give more spatial guidance on the opportunities to locate Higher Education Institutions.		London Borough of Ealing	Change proposed. OPDC identifies the potential for higher education institutions to be 'catalyst uses' and identifies that these are likely to be appropriate in the core development area at Old Oak.
Social Infrastructure, SI2	Refer to LBHF School Organisation and Investment Strategy LB Hammersmith & Fulham School Organisation & Investment Strategy 2015		London Borough of Hammersmith and Fulham	No change proposed. This study will quickly become out of date and Policy TCC4 refers to the need to work with service providers, which would cover LBHF's education department.
Social Infrastructure, SI2	The need for school places is based on a calculation of the child yield from the development.		London Borough of Hammersmith and Fulham	Noted.
Social Infrastructure, SI2	Funding for school development is derived from a combination of Government grants, planning negotiations and land deals with developers.		London Borough of Hammersmith and Fulham	Noted. This is covered in OPDC's Delivery and Implementation chapter.
Social Infrastructure, SI2	The council will consider whether an all-through school will be appropriate. Allocate sites for the provision of new schools (ages 3-18).		London Borough of Hammersmith and Fulham	Noted. OPDC has worked with LBHF in the production of the Education and Health Study, which has informed OPDC's Infrastructure Delivery Plan and allocated sites for provision of new schools in the places chapter.
Social Infrastructure, SI2	The need for wider use of the schools portfolio for Early Years' services, childcare and other services for children and young people should be acknowledged.		London Borough of Hammersmith and Fulham	Change proposed. This is covered in the definition of social infrastructure and required provision for this is identified in OPDC's Infrastructure Delivery Plan.
Social Infrastructure, SI2	Remove figure 99, picture of Westminster City School.		London Borough of Hammersmith and Fulham	Change proposed. This has been removed. OPDC is reviewing its precedents. The Precedents Study informs the case studies in the Reg 19 Local Plan.

Social Infrastructure, SI2	The Local Plan should state who is the Local Education Authority within the OPDC area.		London Borough of Hammersmith and Fulham	No change proposed. The policy would become unnecessarily lengthy if OPDC were to list all service providers for all social infrastructure types.
Social Infrastructure, SI2, Para 10.14	Need to be clearer about how funding will be allocated to local authority education providers		London Borough of Hammersmith and Fulham	No change proposed. This would be dependent on CIL and Section 106 receipts. However, Policy TCC4 does look to secure appropriate facilities to meet needs and this includes both capital and revenue funding.
Social Infrastructure, SI2, Para 10.15	Amend 3rd sentence of para 10.15 to read: 'The OPDC will undertake "early" discussions with education providers to understand the potential for the expansion of existing facilities.'		London Borough of Hammersmith and Fulham	No change proposed. These conversations have now taken place so there is no need to refer to them in the Local Plan.
Social Infrastructure, SI2	OPDC needs to work with boroughs to understand capacity in existing schools		London Borough of Hammersmith and Fulham	Change proposed. OPDC has been working with the local authorities to identify capacity and this has informed the Education and Health Study.
Social Infrastructure, SI2	Should show the location of existing schools in the three boroughs, and in Kensington and Chelsea to see relationship with areas of search.		Old Oak Interim Forum, workshop (x2)	Change proposed. This has now been included in the introduction chapter to the Local Plan.
Social Infrastructure, SI2	Future schools need to be planned for rather than emerging as a response to the market.		Old Oak Interim Forum, Midland Terrace's Residents Group	No change proposed. This requirement was covered in the Reg 18 Local Plan and continues to be in the Reg 19 Local Plan.
Social Infrastructure, SI2	It is suggested that these are linked to training and employment opportunities for young people. It is suggested that section (d) be altered to cover this.		Grand Union Alliance	No change proposed. This is covered in Policy E5 in the Employment chapter.

Social Infrastructure, SI2 and Figure 98	All through school should not be located in Old Oak North/Park area as it is an early phase of development, needs to provide enough capacity to deliver other essential infrastructure, there would not be enough critical mass in terms of child yield and it would reduce integration.		Old Oak Park (DP9)	Noted. OPDC has been undertaking more detailed work looking at phasing and associated infrastructure requirements. This informs the Infrastructure Delivery Plan, which accompanies the Local Plan.
Social Infrastructure, SI2	Broadly support SI2		Old Oak Park (DP9), Hammersmith Society, workshop	Noted.
Social Infrastructure, SI2	Should consider what type of facilities are required - different ages, religious/non-religious, private/public		workshop (x4)	Noted. OPDC supports a range of both public and private community facilities. Proposals would need to accord with Policy TCC4.
Social Infrastructure, SI2	Finding locations for smaller educational facilities such as nurseries might be easier. Nurseries can just fit in once demand is measured.		workshop	Noted. OPDC's Infrastructure Delivery Plan identifies known requirements for early years provision.
Social Infrastructure, SI2	Need will depend on tenure/mix.		workshop	Noted. OPDC has modelled needs on the basis of its affordable housing policy, but needs would change if proposals were to come forward with a different tenure mix. To address this, OPDC has developed an Infrastructure Delivery Plan, which accompanies the Local Plan and is a live document, which can be regularly updated as OPDC gets greater certainty about the social infrastructure requirements related to the quantum of development and tenure mix.

Social Infrastructure, SI2	The locations of new schools should be carefully considered in terms of their impacts (congestion). They should be sited where most needed, and consider views and needs of existing schools. Suggestions included placing them near the new housing, areas with the most intense population or within walkable distances.		workshop (x6)	Change proposed. This thinking has informed the Education and Health Study work and sites identified in OPDC's Infrastructure Delivery Plan and place policies. Policy TCC4 requires that new schools are located in easy reach of foot, cycle and public transport and are close to areas of amenity space.
Social Infrastructure, SI2	School locations should allow for a culturally mixed intake		workshop	Noted. OPDC supports the creation an inclusive community in Old Oak and Park Royal and this is embedded throughout the Local Plan.
Social Infrastructure, SI2	A local resident commented that 'Acton is the perfect catchment area'		workshop	Noted. OPDC's Education and Health Study is based on need and phasing to identify the optimal location and year to provide new school facilities, coupled with the need to provide schools on sites with good access by foot, cycle and public transport and with adequate amenity space nearby, in accordance with Policy TCC4.
Social Infrastructure, SI2	Sports facilities could be co-located with schools		workshop	Change proposed. This colocation of social infrastructure facilities is supported in Policy TCC4.
Social Infrastructure, SI2	Schools should be located away from residential areas to reduce the traffic congestion.		workshop	No change proposed. Schools need to be located close to the areas they serve in order to minimise traffic congestion.

Social Infrastructure, SI2	There is an existing issue with secondary school capacity (i.e. West Twyford recently had to double in size because of the large influx of new homes). Suggestion that priority should be given to secondary schools.		workshop (x2)	Noted. OPDC cannot require new development to address existing deficiencies in capacity, but OPDC is working with service providers to identify gaps in provision and potential sources of grant funding to provide opportunities to address these.
Social Infrastructure, SI2	Question whether all through school model is a good approach as moving from one school to another gives them an environment in which they can be safe and grow.		workshop	Noted. OPDC has been working with the local educational authorities in order to identify the optimum model for delivery. All-through schools are becoming more common-place in London and should be considered as a potential delivery option.
Social Infrastructure, SI2	Park Royal should have nursery/creche facilities.		workshop (x2)	Change proposed. Early years provision will be secured through planning contributions (CIL/S106) and OPDC's Infrastructure Delivery Plan identifies the requirements for early years provision in the OPDC area.
Social Infrastructure, SI3	Overlooks wider public health factors and role of green and open spaces.		LSDC	No change proposed. It is not clear what is meant by this statement in respect of this policy.
Social Infrastructure, SI3	To help achieve this, major developments should be supported by a Health Impact Assessment.		London Borough of Brent	Change proposed. Policy SP3 includes a requirement for schemes to undertake Health Impact Assessments
Social Infrastructure, SI5	Want to rejuvenate and retain the Fisherman's Arms as a community asset		Workshop	Noted. As a public house, any proposals for the Fisherman's Arms would need to accord with Policy TCC7, which looks to protect the pub if it remains economically viable. OPDC has also added the public house to its Local List.
Social Infrastructure, SI3	Public health should be embedded in all developments		workshop	Noted. Policy SP3 requires proposals to support healthy lifestyles and reduce health inequalities.

10. Social infrastructure	OPDC needs to plan for existing social infrastructure needs with equal weight to that of needs of future communities	2	Grand Union Alliance, Harlesden Neighbourhood Forum, 1 resident	Change proposed. OPDC has undertaken discussions with local education and health providers to further understand if there is any shortfall in education and health provision, which has informed the next draft of the Local Plan and the Infrastructure Delivery Plan (IDP).
10. Social Infrastructure	the Plan is supportive of the need to provide healthcare services to meet a growing population	1	NHS HUDU	Noted.
10. Social Infrastructure	The plan should be clearer on the requirements for social infrastructure	2	Royal Borough of Kensington and Chelsea, Ealing Council	Change proposed. OPDC has undertaken more detailed evidence work on social infrastructure needs since the Reg 18 draft Local Plan. This now informs the Reg 19 draft Local Plan and accompanying Infrastructure Delivery Plan.
10. Social infrastructure, SI1	Support proposals for more community uses	1	Resident	Noted.
10. Social Infrastructure, Policy SI4	Support for community centres and that these should be located in town centres	2	2 Residents	Noted.
10. Social infrastructure, Policy SI5	Support retention of public houses	1	1 Resident	Noted.
10. Social Infrastructure, Policy SI3	Need a firm commitment from NHS England and the relevant Clinical Commissioning Group that the proposed new health facilities are supported by them	1	Old Oak Interim Forum	Change proposed. The CCGs have had sign-off of the health aspects of OPDC's Health and Education Study, which informs the Infrastructure Delivery Plan.

10. Social Infrastructure, Policy SI2	Need to specify the location for the all-through school and should not be provided on Cargiant land	1	Old Oak Park (DP9)	Noted. OPDC has been undertaking more detailed work looking at phasing and associated infrastructure requirements. This informs the Infrastructure Delivery Plan, which accompanies the Local Plan.

11. Transport

Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
11. Transport	Wording should be consistent across policies	1	Aurora Developments Ltd (Quod)	Change proposed. Policies have been redrafted to take into account consistency of wording.
11. Transport	Transport (other than train) and pedestrian infrastructure improvements needed between Kensal Canalside and OPDC.	1	Ballymore Group	Noted. OPDC is working with RB Kensington and Chelsea and TfL to investigate potential walking, cycling and bus routes between Old Oak and Kensal Canalside. Connections between the two areas are supported in Policy SP7 and P10.
11. Transport, Policy 1	New transport links should be implemented as early as possible.	1	Ballymore Group	Noted. OPDC acknowledge that new and improved transport links are integral to the success of the area and the Infrastructure Delivery Plan seeks to ensure that transport links are secured with proposals for new development.

11. Transport, Policy 1	Development coming forward in advance of new stations and station redevelopment should be designed to support the delivery and connection to the street and route hierarchy. Development which would jeopardise the future achievement of the route hierarchy should be refused. It should also be a strategic principle for development to integrate with and create connections to the surrounding area.	1	LB Brent	Noted. Transport Policy T1 and SP7 acknowledge the importance of the street hierarchy and that all new roads should be built to adoptable standards. Connectivity is a key policy for all developments.
11. Transport, Policy 2 Walking, Figure 102	Figure 102 Should show pedestrian links to east of Willesden Junction station to Harrow Road, Harlesden and Kensal.	1	LB Brent	Change proposed. The street network map within the Regulation 19 version of the local plan will show links to Harrow Road, Harlesden and Kensal
11. Transport, Policy 2 Walking, Figure 102	An upgraded route to Harlesden Town Centre is required to provide a higher quality environment and improve feelings of safety.	1	LB Brent	Noted. T2 highlights how improved wayfinding and connections will be provided to proposed strategic routes such as Harlesden Town Centre
11. Transport Policy 3 Cycling	There is a lack of cycling connections to the tube stations on the periphery of Park Royal.	1	Brent	Noted. T3 highlights the need to provide appropriate and safe cycling infrastructure to stations in Old Oak and Park Royal. Cycle links across Park royal are shown in the new cycle network map.
11. Transport Policy 3 Cycling	Within Park Royal there are disjointed cycle routes along Rainsford Road and part of Lakeside Drive. There is also an issue of routes being gated.	1	LB Brent	Noted. T3 acknowledges that to realise a shift towards cycle usage, good design and improved legibility is required to create a better cycling connection. The cycle strategy identifies improvements required on Rainsford Road and Lakeside Drive.

11. Transport Policy 3 Cycling	Need to give equal priority to connecting to existing stations with cycle routes as connecting new stations.	1	LB Brent	Noted. T3 acknowledges that cycling proposals will look to enhance both new and existing cycle networks which are comprehensive, safe, direct, attractive and inclusive
11. Transport, Policy 1	Concern over the number of new crossings over the canal due to overshadowing impacts and safety. Need strong justification for crossings.	1	Canals and River Trust	Noted. T1 recognises that in order to achieve a connected place and reduce pressure on current crossings that new crossings will be required. OPDC will work with Canals and River Trust to develop proposals for bridge connections.
11. Transport, Roads policy	Diageo encourages OPDC to consider ways in which the existing congestion issues along key arterial routes can be addressed.	1	Diageo	Noted. The Local Plan identifies measures to address existing congestion particularly associated with freight. T1 promotes the Healthy Streets approach which will enable a shift to walking, cycling and public transport use, and reduced dependency on the private car.
11. Transport. Policy 7 Car parking	Policy on car parking standards should be more flexible depending on the accessibility of sites. GUA &MTRG suggested 0.2 was challenging and would affect marketing of housing	4	Diageo, GUA, Midland Terrace Residents Group, Resident	Noted. T4 recognises that access to public transport and operational or business needs will be considered in context of implementing limited car parking provision. The car parking study undertook an independent assessment of the proposed parking standards on marketability and concluded that 0.2 spaces per residential unit was acceptable.
11. Transport, Policy 1	Support for transport hierarchy. Needs to be a policy	2	Diocese of London GUA	Noted. SP7 policy includes the transport hierarchy. T1 acknowledges transport hierarchy and that certain locations require different modal prioritisation.
11. Transport. Policy 7 Car parking	Support approach to car parking	2	Diocese of London, resident	Noted. T4 addresses the overall parking policy and that business and operational needs for parking will be considered in context of public transport availability.

11. Transport Policy 9 Construction	Construction is very important for the protection of the amenities of existing residents and town centres	1	Diocese of London	Noted. T8 seeks to manage and mitigate impacts of construction on communities.
11. Transport policy 6 roads and streets	The challenge of dealing with growth together with development traffic (albeit limited by discouraging vehicle use and encouraging modal shift as much as possible) is a significant challenge.	1	Diocese of London	Noted.
11. Transport. Policy 7 Car parking	Support for all spaces having electric charging points	1	Diocese of London	Noted. T4 notes when providing car parking, proposals should incorporate 20% active and 80% passive electric charging points for electric vehicles.
11. Transport. Policy 7 Car parking	Commercial parking level shouldn't be increased	3	Diocese of London, GLA, TfL	Noted. OPDC doesn't intend to increase commercial parking levels. T4 recognises that access to public transport and operational/business needs for parking will be assessed on a case by case basis.
Fig 102, 105, 110	New east-west route north, adjacent to the scrubs is supported if doesn't impact on Scrubs	3	Friends of Wormwood Scrubs Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. To accord with the Wormwood Scrubs Act, policy P12 seeks to improve access to the Scrubs for all Londoners through new and improved sensitive walking and cycling routes from surrounding areas. The new east-west route (Wormwood Scrubs Street) is north of Wormwood Scrubs and does not impact on the scrubs
11. Transport Policy 3 Cycling	Do not support cycling links through the scrubs	1	Friends of Wormwood Scrubs	Noted. To accord with the Wormwood Scrubs Act, policy P12 seeks to improve access to the Scrubs for all Londoners through new and improved sensitive walking and cycling routes from surrounding areas.
Figure 110	Figure 110 Shows existing cycle routes as proposed	1	Friends of Wormwood Scrubs	Change proposed. Figure 110 is being replaced with a new cycling network.

11. Transport Policy 3 Cycling	A possible route was canvassed on the eastern edge of the Scrubs- do not support the route if it involves cutting into the strip of woodland on the eastern fringe of the Scrubs.	1	Friends of Wormwood Scrubs	Noted. To accord with the Wormwood Scrubs Act, policy P12 seeks to improve access to the Scrubs for all Londoners through new and improved sensitive walking and cycling routes from surrounding areas.
11. Transport Policy 2 Walking	Resting places are required along walking routes	1	GLA	Noted. T1 and T2 support the 10 'Healthy Streets' Indicators which cover the factors essential for health-promoting, inclusive street environments. This includes 'Places to stop' amongst the objectives.
11. Transport Policy 3 Cycling	Cycling infrastructure shouldn't be at detriment of pedestrians	1	GLA	Noted. T1 acknowledges transport hierarchy and recognises that certain modes will need to be prioritised in some locations.
11. Transport Policy 3 Cycling	No mention of inclusive strategy for non two-wheeled cycles	1	GLA	Noted. The Local Plan doesn't go into this level of detail but OPDC will look into ensuring public realm and space is accessible an inclusive with all. Policies SP9 and D3 specifically deal with this.
11. Transport Policy 6 Roads and streets	Roads section makes no mention of inclusive design and no mention of safety particularly for disabled and older people. It would be good to see a commitment to ensuring that walking routes are level and well lit	1	GLA	Change proposed. T1 acknowledges that adoption of the healthy streets approach will ensure OPDC streets are accessible and inclusive to disadvantaged groups moving through them as well.
11. Transport	Need a canal policy and policy re water movement	1	GLA	No change proposed. Policy P4 in the regulation 18 Local Plan has been amended and continues to be included as policy P3 within the regulation 19 Local Plan.
Transport evidence base North Acton Station study	The North Acton station study was a pre-feasibility study and is now completed	2	GLA, TfL	Change proposed

11. Transport. Strategic policy	Policy T1 Key issues should additionally mention the important role of freight transport in sustaining the economic vitality of Park Royal and the need to plan for freight transport into the future.	2	GLA, TfL	Noted. T7 recognises the importance of freight.
11. Transport. Strategic policy	Hierarchy of transport users: The wording implies that pedestrians and cyclists should be prioritised ahead of public transport. TfL would prefer this to emphasise that there should be priority for pedestrians, cyclists and buses in the overall strategy for roads.	2	GLA, TfL	Noted. The transport hierarchy section in P1 was derived from the walking, cycling and public realm strategy. However, it emphasises that there will be certain locations in Old Oak and Park Royal where freight, buses and other modes need to prioritised.
11. Transport. Strategic policy	Primary/ secondary/ tertiary routes: The designation of primary routes could imply that these will be suitable for vehicles where this may not be the case.	2	GLA, TfL	Change proposed. The figure will be updated to show the indicative modal hierarchy of routes
11. Transport	Figures 102, 105 and 110 do not appear to show all bridges over the canal. Ped/ cycle bridge is missing	2	GLA, TfL	Change proposed. Figures are being updated for the Reg 19 draft.
11. Transport	Figures 102, 105 and 110 should show pedestrian and cycle routes extending over (and in the case of the future cycle network, along) the A40 corridor.	2	GLA, TfL	Change proposed. Figures are being updated for the Reg 19 draft.
11. Transport. Strategic policy	T1 Preferred policy option c - There should be something more specific on prioritising active travel and public transport, rather than the more generic ‘sustainable transport modes’.	2	GLA, TfL	Change proposed. Policy T1 , in line with the Healthy Streets Approach, indicates and need to prioritise active travel and public transport.

11. Transport. Policy 2 walking	The national policy context could reference Manual for Streets as being the principal source for national street design guidance for urban streets.	2	GLA, TfL	No Change proposed. The national policy context is no longer part of the Regulation 19 version of the local plan. The need to comply with relevant design guidance has been added to policy T1
11. Transport. Policy 2 walking	Regional policy could refer to Pedestrian Comfort Guidance and TfL's forthcoming London Pedestrian Design Guidance.	2	GLA, TfL	No Change proposed. The regional policy context is no longer part of the Regulation 19 version of the local plan. The need to comply with relevant design guidance has been added to policy T1
11. Transport. Policy 2 walking	Preferred policy option for T2 – This should include a specific point on the creation of inclusive walking environments. It should also make a commitment to a 'consistently high level of pedestrian comfort' or similar.	2	GLA, TfL	Change proposed. The policy text has been updated to include "inclusive walking environment".
11. Transport. Policy 2 walking. Fig 105	Figure 105 - The distinction between streets shown in white and those shown in dark grey is unclear.	2	GLA, TfL	Change proposed. Maps have been updated for the regulation 19 version.
11. Transport. Policy 2 walking. Fig 105	It is not clear how the identification of potential junction improvements relates to the wider walking infrastructure as this is not referenced in the wording of the policy or justification.	2	GLA, TfL	Change proposed. Maps have been updated for the regulation 19 version.
11. Transport. Policy 3 cycling. Paragraph 11.17	TfL has recently adopted the target of 1.5 million journey stages per day by cycle by 2026.	2	GLA, TfL	Noted. OPDC will work with its development partners, including TfL to reach and exceed the targets within their policies.
11. Transport. Policy 3 cycling.	The correct name of the vision is The Mayor's Vision for Cycling in London.	2	GLA, TfL	Noted. The Healthy Streets approach is now the up-to-date vision for walking, cycling and public transport so this document has been referenced.

11. Transport. Policy 3 cycling.	With reference to Preferred policy option a) - The term ‘State of the art cycling infrastructure’ may not capture what is required. This could instead refer to ‘Provide a coherent, joined-up and attractive cycling network that encourages people to cycle’	2	GLA, TfL	Change proposed. This has been removed from the policy wording and has identified areas where connections should be made along with the wording deliver a comprehensive, safe, attractive and inclusive cycle network across Old Oak and Park Royal.
11. Transport. Policy 3 cycling.	With reference to Preferred policy option b) – This could be separated out into two points, i.e. ‘Provide links to and upgrade existing cycle connections’ and ‘Provide convenient and direct facilities, dedicated to cyclists wherever possible rather than shared with pedestrians’	2	GLA, TfL	Change proposed. The policy has been reworded to include further details regarding existing cycle connections and also to include cycle facilities at key nodes.
11. Transport. Policy 3 cycling.	With reference to Preferred policy option f) - Instead of ‘at least meet the standards’, ‘exceed the standards’ as used in paragraph 11.23 on page 262 would be more appropriate.	2	GLA, TfL	Change proposed. The policy text has been updated to include "where possible, exceed the standards”.
11. Transport. Policy 3 cycling.	‘Well located’ should be added to the requirements (possibly replacing ‘integrated’)	2	GLA, TfL	Change proposed. This has been inserted into Policy T3
11. Transport. Policy 3 cycling.	For section 11.21 – A reference to overcoming severance caused by the various railway lines that intersect the area as well as the A40 and A406 should be added here.	2	GLA, TfL	Change proposed. The need to overcome severance has been referenced throughout the Local Plan

11. Transport. Policy 3 cycling.	It will be important that if a more localised cycle hire scheme is implemented in the short term it is designed from the outset so that it can be incorporated into the wider existing Mayoral cycle hire scheme if this is extended into the area.	2	GLA, TfL	Noted. T3 f. states that the OPDC will support the delivery and/ or contribute towards the provision of cycle hire across Old Oak and Park Royal, including from independent providers.
11. Transport. Policy 6 Roads and streets.	New utilities should be planned in such a way so as to avoid/minimise the impacts of future utility works on the road network.	2	GLA, TfL	Noted. This is part of Policy T1
11. Transport. Policy 7 Car parking	The wording should clarify that it is referring to the London Plan policy	2	GLA, TfL	No Change proposed. The Local Plan clarifies that it does not repeat London Plan policy, unless it is necessary to do so.
11. Transport. Policy 7 Car parking	Provision for coaches in Old Oak. There may also be potential to provide departure facilities for scheduled coach services in Old Oak that could serve a wider area of north and west London. This could include provision of stop and stand facilities for coach services. As stated above provision, for scheduled coach services as opposed to parking for tour or day coaches should be included alongside the Buses section because they will form part of the public transport offer.	2	GLA, TfL	Change proposed. OPDC acknowledge that Old Oak has a potential to serve some of North and West London by coach and therefore T4 e. states that proposals should provide suitable facilities to cater for anticipated demand for taxis and coaches".

11. Transport. Policy 7 Car parking	Amend wording on taxis too: 'Whilst it will be important to carefully manage onward journeys from stations to encourage walking, cycling or using the bus network where possible, there is still likely to be a demand for taxis and private hire vehicles (PHVs) generated by the HS2/Crossrail/ National Rail interchange and other uses such as a cultural or leisure attraction. The interchange will be designed with fully accessible taxi ranks within close vicinity to the station exits and set down/pick up facilities for pre booked taxis and PHVs. Where specific development types will attract a large number of visitors, facilities for coach parking, taxi ranks and general pick up and drop off areas will need to be provided.'	2	GLA, TfL	Change proposed. Text has been inserted to cover this suggested wording in policy T4 (car parking)
11. Transport. Policy 7 Car parking	Taxis: The justification should make it clear that in general taxi ranks should be kept separate from any pick up or set down facilities and need dedicated space.	2	GLA, TfL	Noted. This is considered too detailed a point for the Local Plan and would be dealt with on a case by case basis.

11. Transport. Policy 1.	A range of scenarios with more visionary approaches to the nature of the network and available transport should be carried out and be made available for public scrutiny/consultation. The current proposals are quite traditional given the transport changes (driverless cars and demand-responsive transport for example) that are likely to occur between now and completion of development.	1	GUA	No change proposed. Policy EU11 recognises the potential for smart technology to revolutionise transport in the future, but the local plan's policies need to be suitable for assessing development proposals in the short term. The Local Plan will be monitored through key performance indicators and as new technology comes on line, the Local plan can be updated accordingly.
11. Transport. Policy 1.	Minimisation of the scale, complexity and cost of transport infrastructure in the area should be a guiding objective of this plan. This should be reflected in the policy.	1	GUA	Noted. OPDC's transport infrastructure requirements are set out in the Local plan and in the IDP. The approach to infrastructure, including transport infrastructure is evidenced by a number of detailed supporting studies. As proposals gain greater certainty, this infrastructure list will be revised an accordingly updated.
11. Transport. Policy 1.	Rather than focus on the usual themes or modes of transport, it may be more helpful to plan around 'categories of users' and how the OPDC will address needs.	22	GUA, Residents	No change proposed. The exact demographic profile of the development is unknown and to make assumptions at this stage may result in inappropriate infrastructure requirements being identified.
11. Transport. Policy 1.	All transport policies should be aligned with key partners.	1	GUA	Noted. OPDC are working closely with all partners to ensure key deliverables and policies are aligned.
11. Transport. Policy 1.	Walking, Cycling, Streets and Public Realm Strategy is essential to redress the balance of published transport evidence which is weighted towards motorised movements in the Transport Studies.	1	GUA	Noted. Policies T1, T2 and T3 all identify the importance of healthy streets, walking and cycling within the vision for Old Oak and Park Royal.

11. Transport. Policy 1.	OPDC should enable a continuing dialogue through the plan-making process with communities to allow their detailed transport proposals to be shared and considered.	1	GUA	Noted. OPDC are committed to ensuring that ongoing dialogue with local communities continues past the consultation stage of the Local Plan.
11. Transport. Policy 2 Walking	Segregation of pedestrians from cyclists is required, including paint or level differences for cyclists	9	GUA, residents	Noted. OPDC recognises the importance in transport hierarchy and within the supporting text to T1, it outlines that segregated facilities and movement corridors for cyclists within some areas will be required. The cycling strategy and policy T3 identifies indicative locations where segregation could be considered. This will need to be developed further as proposals come forward.
11. Transport. Policy 2 Walking	Footpaths should be wide enough, and kept clear of obstructions – parked vehicles etc. -. Park Royal with its narrow streets is difficult to walk	1	GUA	Noted. T1 and T2 promote the delivery of high quality walking environments. OPDC is working with the local highway authorities to rationalise the parking conditions in Park Royal to free up space for other road users and improved public realm.
11. Transport. Policy 2 Walking	Policy (d) should be strengthened by encouraging the creation of greened/treed routes and a green walking surface as well as hard surfaces.	1	GUA	Noted. T1 and T2 outline the importance of creating appropriate routes which includes the creation of green streets. There is an acknowledgement that both cycling and walking is made safer and more appealing through the use of tree planting, soft landscaping and sustainable drainage.
11. Transport. Policy 2 Walking	Need to consult community when doing the walking, cycling, streets and public realm strategy	2	GUA	Noted. The Public Realm, Walking and Cycling Strategy accompanies the Regulation 19 Local Plan and is being consulted on as a supporting study.

11. Transport. Policy 3 Cycling	Cycle links need to extend beyond MDC boundary and connect with wider area	2	GUA, Harlesden Neighbourhood Forum	Noted. T3 outlines that the cycle network needs to connect into and support the wider network around Old Oak and Park Royal. The cycling strategy assessed the existing and future cycling networks in Old Oak and Park Royal and surrounding areas.
11. Transport. Policy 6 Roads and Streets	Policy should prioritise the resolution of existing transport problems and promotion of sustainable forms of transport.	1	GUA	Noted. The policies promote more sustainable forms of transport, including walking, cycling, electric vehicles, public transport and others that are key to improving traffic conditions around Park Royal and Old Oak.
11. Transport. Policy 6 Roads and Streets	There is no need for, and should not be provided, any route from Crossrail HS2 Station direct to the Scrubs.	7	GUA, Midland Terrace Residents Group, Old Oak Interim Forum, Residents	No change proposed. The Wormwood Scrubs Act (1879) requires that Wormwood Scrubs should provide for the enjoyment of inhabitants of the metropolis. Providing accesses accords with this. The park is also identified as a Metropolitan Open Land in the London Plan and providing access to it accords with this designation. The Local Plan requires (Policy P12) that any proposals for the Scrubs are sensitive to it and are agreed by the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham.
11. Transport Policy 1	para a) line 2: insert “and inclusive” between ‘accessible” and “transport”	1	Hammersmith and Fulham Disability Forum	Change proposed. The introduction of the Healthy Streets Approach into the policy has meant that inclusivity and accessibility is integral to street design and movement. Accessible and inclusive design is also required in all elements of buildings and the public realm through policies SP9 and D3.

11. Transport Policy 1	New para g) mitigate walking distances and steep gradients or steps or provide visible alternative pedestrian routes	1	Hammersmith and Fulham Disability Forum	Noted. Policy T1 and T2 indicate the need to deliver high quality, safe, accessible and inclusive walking environments across Old Oak and Park Royal. The street network must also be accessible for all users, ensuring gradients of at least 1:20
11. Transport Policy 7 Car parking	It is essential that proposals for the design and location of blue badge parking bays comply with Building Regulations M1 for housing) and AD M2 for non residential buildings).	1	Hammersmith and Fulham Disability Forum	Noted. Building regulations are national standards and would be applied.
11. Transport Policy 7 Car parking	Need accessible and inclusive drop off points at appropriate locations throughout the OPDC area for elderly and disabled people.	1	Hammersmith and Fulham Disability Forum	Noted. Policy T1 and T2 indicate the need to deliver high quality, safe, accessible and inclusive walking environments across Old Oak and Park Royal.
11. Transport policy 1	Supportive of policy	1	Heathrow	Noted.
11. Transport policy 2 walking	Ped crossing facilities are not mentioned	1	LBHF	Noted. Policies T1 and T2 state that proposals must support the delivery of high quality walking environments, which includes pedestrian crossings for pedestrian safety.
11. Transport policy 6 roads and streets	‘All new and improved roads must be built to adoptable standards and any decision to adopt streets would need to be made in collaboration with the relevant local councils.	2	LBHF	Noted. T1 states that all new streets should be built and designed to adoptable standards. OPDC is committed to working with Local Highway Authorities with regards to adoption.
11. Transport policy 6 roads and streets	Suggest adding a bullet point (or amending bullet point (e) to refer to role that streets and roads can play in helping provide resilience against climate change impacts.	1	LBHF	Noted. The policy wording has been amended to include futureproofing for changes in context, lifestyle and technology. The Sustainability chapter includes further details regarding Climate Change.

11. Transport policy 6 roads and streets	The role that car parking can play in providing environmental management benefits should be highlighted.	1	LBHF	Noted. T4 outlines OPDC's approach to parking, which includes details of electric charge points and car clubs to assist with environmental management.
11. Transport Policy 1	Support of T1	1	Old Oak Park (DP9)	Noted.
11. Transport policy 2 walking	Support of T2	1	Old Oak Park (DP9)	Noted.
11. Transport policy 3 cycling	We are supportive of the overall objectives of Policy T3, however we think the policy wording should be amended to avoid being overly prescriptive.	1	Old Oak Park (DP9)	Noted. The wording has been amended to reflect the overarching aims of connectivity, safety, inclusivity, interchanges, wayfinding, security and delivery. It has also been informed by the cycling strategy supporting study.
11. Transport Policy 3 Cycling	Policy T3 (b) (Cycling) is poorly worded and should be redrafted.	1	Royal Borough of Kensington and Chelsea	Change proposed. This section has been reworded.
11. Transport policy 6 roads and streets	This section fails to identify that a number of adjacent areas, including the Kensal Canalside Opportunity Area, are not connected to the OPDC area by road. This shortcoming should be addressed by the plan and wording of Policy T6 modified accordingly.	1	Royal Borough of Kensington and Chelsea	Change proposed. Policy T1 indicates the need to provide connections to surrounding areas, including Kensal. Connections between the two areas are supported in Policy SP7 and P10.

11. Transport policy 6 roads and streets	The Council notes that the planned new road link between Scrubs Lane and Ladbroke Grove just to the south of the Great Western Mainline is not included as a part of the Transport Study. This is disappointing. That being the case it is not surprising to learn from the Transport Strategy Performance chapter within the OOSTS that “traffic leaving the development to the east does so via A219 Scrubs Lane. It then dissipates through the network in an attempt to travel west and on the B412 towards the east” (page 125).	1	Royal Borough of Kensington and Chelsea	Change proposed. The road link between Scrubs Lane and Ladbroke Grove was investigated in concept detail as part of the walking, cycling, streets and public realm strategy and is shown in the network diagrams in the chapter. Further work is required to understand the feasibility of creating this new link.

	The B412 (North Pole Road, St. Quintin Avenue, St. Mark's Road and Cambridge Gardens) uses residential streets, is narrow in places and is ill-suited to accommodating much additional traffic. There is an existing congestion problem on North Pole Road with queuing back from the Wood Lane junction. The multi modal transport modelling indicates that "as most origins are in the south east, the preferred route [to the development area] appears to be through St Ann's Road and North Pole Road, whilst a more logical route would be through Wood Lane or the A3220. This can be explained by the worsening traffic conditions at the Du Cane Road and Wood Lane junction making this route unattractive". Clearly these results are a cause for concern. Much further work on the transport strategy is required before substantive development begins. The planned new road link (potentially restricted to public transport and active modes) between Scrubs Lane and Ladbroke Grove just to the south of the Great Western Mainline would partly mitigate the projected impact on existing Borough roads and should be included within the strategy.	1	Royal Borough of Kensington and Chelsea	Change proposed. The road link between Scrubs Lane and Ladbroke Grove was investigated in concept detail as part of the walking, cycling, streets and public realm strategy and is shown in the network diagrams in the chapter. Further work is required to understand the feasibility of creating this new link.

11. Transport policy 1	Policy does not recognise that private vehicles are also an important part of business requirements, such as for shift work where public transport is not an option and for suppliers to purchase goods	2	SEGRO, community group representing a university	No change proposed. This is recognised in Strategic Policy 7 and the transport chapter supporting text.
11. Transport policy 1	The demands of urban logistics operations also require a large number of Light Commercial Vehicles (LCVs) but these often take the place of private vehicle trips (e.g. supermarket trips). This should be recognised.	1	SEGRO	Noted. T7 outlines the OPDC's approach to delivery and servicing. There is recognition that LCV trips are becoming more common for deliveries and new developments should make design provisions for this.
11. Transport policy 1	SEGRO considers that this policy should also recognise that existing highway routes throughout the OPDC area – the A40 in particulat- are already operating at or over capacity.	1	SEGRO	No change proposed. This is recognised in Strategic Policy 7 and the transport chapter supporting text.
11. Transport policy 1	This policy should acknowledge the important business requirements for use of existing roads and streets, particularly for urban logistics, just in time and last mile deliveries.	1	SEGRO	Noted. Within the supporting text of T1, there is acknowledgement of the road network supporting business growth and the implementation of measures to address congestion. T7 (d) seeks to maximise the use of more sustainable methods of delivering goods in the last mile.
11. Transport policy 1	OPDC should seek to ensure that the future significant development anticipated at Old Oak Common does not contribute further to congestion on an already constrained road network.	1	SEGRO	Noted. OPDC, through these transport policies, will encourage modal shift away from the road network to more sustainable methods of travel such as rail, cycling and walking.

11. Transport policy 7 Car parking	Policy does not appear to take into account the requirements of shift work in urban logistics operations which can increase the requirement for car parking. Need short term parking that works for local businesses	2	SEGRO, table at workshop	Change proposed. Policy T4 recognises that some businesses will have a requirement for parking. This has been reflected in the policy and will be assessed on a case by case basis.
DIFS	Supportive of the need for improvements to infrastructure, but concerned that the DIFS focuses on the Old Oak Common area. There are issues with transport and utilities in Park Royal.	1	SEGRO	Change proposed. The Infrastructure Delivery Plan includes transport infrastructure requirements in Old Oak and Park Royal
11. Transport Policy 5 Buses	Figure 118 illustrates an indicative bus network which was previously put forward but this network is likely to evolve as further work is carried out. Rather than 'proposed routes' those shown in purple should be labelled as 'roads that may form part of a future bus network.' As stated in 11.39 there will need to be a comprehensive review of the bus network which leads to the development of a Bus Strategy for the area.	1	TfL	Change proposed. Figure has been updated to reflect current thinking regarding buses
11. Transport Roads and Streets	Scrubs Lane and Old Oak Common Lane cannot be considered in isolation either to the road capacity in Harlesden and should be reviewed as a whole.	1	The Hammersmith Society	Noted. The Old Oak Strategic Transport Modelling Study considered the whole road network.
11. Transport Figure 102, Page 253	Figure 102: P.253, Old Oak Common Lane is incorrectly shown as connecting up with East Acton Station.	1	The Hammersmith Society	Change proposed. The figure has been updated.

11. Transport Figure 102, Page 253	This same map should be redrawn to add the canal (The towpath is shown on other drawings) and remove A40 and A406 as designated walking routes.	1	The Hammersmith Society	Noted. All figures are being updated for the regulation 19 Local Plan
11. Transport Policy 1	Gross overcrowding on the railways, and the projected demand for further capacity, must be addressed	1	The London Forum	Noted. T5 along with the Infrastructure and Delivery Plan aims to enhance rail capacity within Old Oak and Park Royal to cater for existing and projected demands.
11. Transport Policy 1	Old Oak Common represents an unique opportunity to bring several railway lines together in a way that provides smooth interchange between them	1	The London Forum	Noted. T5 acknowledges that the four existing stations, plus three new stations, require appropriate design and layout responses to enhance passenger experiences and provide fast interchanges between transport modes.
11. Transport Policy 6 Roads and streets	There are limited road access points into and out of Park Royal. These peripheral points are identified in the Draft Plan but no proposals are shown of how they will be upgraded to cope with the increase in traffic. Therefore how have they been costed accurately?	1	West Twyford Residents' Association	Change proposed. Proposals are now more clearly identified in the Local Plan place policies and in the IDP. The Delivery and Implementation chapter notes that OPDC will be working with a number of stakeholders to secure appropriate funding for and delivery of this infrastructure.
11. Transport Policy 1	The Local Plan should align itself to the best analysis of future transport needs and technical infrastructure, even though the subject is full of uncertainty.	1	Resident	Noted. The transport policies acknowledge that standards should cater for future demand and changes in travel behaviour. Policy EU11 recognises the potential for smart technology to revolutionise transport in the future, but the local plan's policies need to be suitable for assessing development proposals in the short term. The Local Plan will be monitored through key performance indicators and as new technology comes on line, the Local plan can be updated accordingly.

11. Transport Policy 1	Transport demand should consider those who live, work or shop in the area. Walking and cycling should be made attractive to them.	1	Resident	Noted. T1, T2 and T3 all include measures to encourage walking and cycling whilst introducing measures to improve connectivity for local people. SP7 promotes transport oriented development where facilities and amenities are located close by and connected by high quality walking and cycling routes.
11. Transport Policy 3 Cycling	Hire bikes in the whole OPDC area must be available, with widespread secure bike-stabling for commuters and others	2	Resident, local business	Noted. T3 supports the delivery and contribution towards the provision of cycle hire across Old Oak and Park Royal, including from independent providers.
? Need to add this to the schools section	Discourage car based school runs	1	Resident	Noted. T1, T2 and T3 all include measures to encourage walking and cycling, therefore discouraging unsustainable methods of travel for short journeys. SP7 promotes transport oriented development where facilities and amenities are located close by and connected by high quality walking and cycling routes.
11. Transport policy 2 walking	Walking to work should be encouraged for local people.	1	Resident	Noted. T1, T2 and T3 all include measures to encourage walking and cycling over short distances whilst introducing measures to improve connectivity for local people. SP7 promotes transport oriented development where facilities and amenities are located close by and connected by high quality walking and cycling routes.
Transport policy 1	Transport improvements should be expanded beyond OPDC area.	1	Resident	Noted. OPDC will be working with neighbouring boroughs and development partners to ensure a coherent and cohesive approach to transport improvements is undertaken
Transport policy 6 Roads and Streets	Need to Manage through traffic from strategic roads	1	Resident	Noted. Policy T1 promotes that any new through routes should be designed to discourage through traffic including traffic calming and controlled crossing facilities.

Transport Policy 2 Walking	A better walking route from the Alliance Road Central Line overbridge to Park Royal Underground station needs to be developed, away from the edge of the A40.	1	Resident	Change proposed. This is identified in the IDP and on the walking map
Transport Policy 2 Walking	Expenditure on Legible London signage should leak out of the strict OPDC area, and appear on neighbouring streets.	1	Resident	Noted. T2 makes clear that waking improvements should enable walking connections to surrounding areas.
Transport Policy 3 Cycling	There is an existing through cycling route from Premier Park Road to Waxlow Road – not the line shown on the Walking map, but behind some of the warehouses. It is an alternative to using the Grand Union Canal and it should be added to the Cycling Map in blue as it has very little road traffic (although a high proportion of lorries).	1	Resident	Change proposed. The cycle network map will be updated to include this route
Transport Policy 3 Cycling	The A40 provides a barrier to north-south cycling, with a large gap between Gypsy Corner and the underpass at Park Royal Underground station.	1	Resident	Noted. OPDC will working with TfL to investigate solutions for reducing the barrier of the A40. Infrastructure that will assist in supporting this is identified in the Park Royal West (P4) and North Acton and Acton Wells (P7) places.
Transport Policy 3 Cycling	The new north-south route into Wormwood Scrubs, further east than the HS2 station entrances, should allow cycling as well as walking. At Wormwood Scrubs the cycling route should turn east only, to reach Scrubs Lane.	1	Resident	Noted.

Transport Policy 3 Cycling	There should be segregated cycle paths along the whole length of Scrubs Lane, and a new study should be carried out, jointly with LB of Hammersmith & Fulham, to recommend how best to achieve this. This evidence should be published by the OPDC in time for the next stage of the Local Plan. It seems possible to add a cantilevered cycle path to the side of one or other of the Great Western Main Line overbridges, Scrubs Lane or the West London Line.	3	Residents and charity representative	Change proposed. This is being proposed in the Scrubs Lane Place Policy and the Scrubs Lane Development Framework Principles
Transport Policy 3 Cycling	Segregated cycle paths should be added to Acton Lane West Coast Main Line overbridge, if vehicular lane narrowing is possible.	1	Resident	Noted. Acton Lane was identified as a cycle link requiring the highest level of cycle confidence to cycle on it in the Public Realm, Walking and Cycling strategy. This link is identified in the IDP for cycle improvements.
Transport Policy 3 Cycling	All existing cycle access routes to the Grand Union Canal towpath should be reviewed and improved. Even if no canal bridge is constructed immediately from Waxlow Road, a cycling link from the towpath to McNicol Drive should be added.	1	Resident	Noted. OPDC supports the requirement to improve access routes to the canal. The link from the towpath to McNicol Drive is classed as an "off-road" cycle link.
Transport policy 6 Roads and Streets	Policy option (a) about overcoming severance and optimising connectivity should apply as much to Park Royal as to Old Oak Common.	1	Resident	Change proposed. The Local Plan now notes the importance of this in Park Royal as much as in Old Oak.
Transport policy 6 Roads and Streets	Tunnelling options would likely mean a disproportionate budget was spent on catering for car use. Do not 'predict and provide'.	1	Resident	Noted. Tunnelling options is part of a range of options being investigated. Cost will be part of this assessment.

Transport policy 6 Roads and Streets	The main route into the HS2 station is from the east, not the west. Traffic should go back out the same way.	1	Resident	Noted. The connections to and from Old Oak Common station by different road users is being investigated by OPDC, TfL, DfT and HS2 Ltd.
Transport policy 6 Roads and Streets	Through routes in Old Oak Common should be minimised, but not entirely absent. Through routes should be carefully managed, with interventions to make them unattractive to motorists for longer journeys and for 'rat-running'.	1	Resident	Noted. Policy T1 promotes that any new through routes should be designed to discourage through traffic including traffic calming and controlled crossing facilities.
Transport policy 7 Car parking	Study needed on parking standards for low-provision development	1	Resident	Change Proposed. OPDC's Car Parking study was undertaken to complement the strategic transport study recommendations
Transport policy 6 Roads and Streets	Road cloures should be as short as possible.	1	Resident	Noted. OPDC will work with delivery partners to ensure road closures are as short as possible.
11. Transport policy 2 and 3	New pedestrian/cycle link (bridge) should be added over railway tracks from Old Oak North in northwest direction towards Old Oak West; so between Powerday site and Old Oak Lane. Currently poor connectivity here and current proposals do not resolve this.	1	Resident	Noted. A number of new connections are being proposed to improve connectivity in Old Oak.
Transport policy 6 Roads and Streets	No vehicles unless electric in the area	1	Resident	Noted. T4 seeks new development to incorporate 20% active and 80% passive electric charging points for electric vehicles at all new parking spaces and to provide fast or rapid charging at strategic locations such, as retail uses, where electric vehicles may not be expected to park for long periods of time.

Transport policy 6 Roads and Streets	More thought needs to go to the traffic issues that additional population will bring	1	Resident	No change proposed. The Old Oak Strategic Transport Modelling Study investigated the impact of new trips from development on the public transport and highway network and recommended a number of solutions to alleviate issues. The infrastructure requirements for this have been appropriately embedded in the Local Plan and IDP.
11. Transport policy 1	The transport network will not cope with the extra commuters on the network	1	Resident	No change proposed. The Old Oak Strategic Transport Modelling Study investigated the impact of new trips from development on the public transport and highway network and recommended a number of solutions to alleviate issues and the infrastructure requirements for this have been appropriately embedded in the Local Plan and IDP.
11. Transport policy 3	Segregated cycle lanes should be provided along all routes, with cycle parking integral to the designs of the stations, residential and shopping areas.	3	Resident	Noted. T3 seeks to deliver and/ or contribute to new and existing cycle networks. Additionally, T3 seeks to provide high quality, secure, well located, convenient and accessible cycle parking facilities at all appropriate locations. The cycling strategy assessed the existing and future cycling networks in Old Oak and Park Royal
11. Transport policy 2, Walking, fig 105	There should be an additional Junction improvement in Fig 105 at the junction between the Harrow Road and the walkway into Willesden Junction. This is already one of the most important and busy pedestrian junctions in the entire area and will only get busier.	2	Resident	Change proposed. This is indicated in the Willesden Junction place policy and the street network figures
11. Transport Car Parking	Should not allow increases to parking ratios	1	Resident	Noted. There are no plans to increase the parking ratios.

Key connections workshop question	A local resident commented that taxis could arrive at Old Oak station from the east.	1	Resident	Noted. The connections to and from Old Oak Common station by different road users are being investigated by OPDC, TfL, HS2 Ltd and DfT.
11. Transport Policy 7 Car parking	There is 'parking anarchy in Park Royal! This makes cycling difficult. Even with cycle lanes'	3	Community representative, resident, resident	Noted. OPDC have identified local concern regarding parking within Park Royal and will work with existing businesses, the highway authorities and local amenity groups to achieve a co-ordinated approach to the implementation of robust parking solutions across the area.
11. Transport policy 3	New cycle route north of the Grand Union Canal. S/he explained that 'all that stops it is a Royal Mail gate. If this was removed you would have a good route'	1	Resident	Noted. OPDC will support proposals to introduce a towpath on the northern edge of the canal in Old Oak, where appropriate and feasible.
11. Transport policy 3	There should be no shared surfaces along the canal	1	Resident	Noted. OPDC will work with the Canal and River Trust to understand the possibilities for cyclists and pedestrians using the canal towpath. OPDC will also investigate alternative east-west cycle routes.
Canal	'towpaths on both sides of canal is a good thing as long as it does not mean knocking down old warehouses'. Set buildings back to provide for cyclists on north side.	3	Residents and charity representative	Noted. OPDC will work with the Canal and River Trust to understand the possibilities for cyclists and pedestrians using the canal towpath. OPDC will also investigate alternative east-west cycle routes.
11. Transport policy 3	The area to the north of West Acton station is 'totally car based' and suggested a possible cycle route parallel to the Central Line	1	Resident	Noted. This is outside the OPDC boundary
Connections	'impossible to get from West Acton to Harlesden as the pinch points are still there and they are going to pinch even more' . Pinch points should be removed.	1	Resident	Noted. OPDC will work with the local highway authorities to investigate solutions for relieving traffic congestion and reducing pinch points.

Connections	bigger question is will two new roads be sufficient and will it be able to handle the increased number of jobs in the area?'	1	Student	No change proposed. A number of new roads are being planned in Old Oak to ensure the area is well connected and accessible.
11. Transport policy 3	Promote cycling	2	Student, resident	Noted. T3 promotes new and existing cycling routes throughout the Old Oak and Park Royal area.
11. Transport policy 3	Cycle lanes may help manage car traffic and encourage use of the Scrubs	1	Student	Noted. T3 seeks to deliver and/ or contribute to new and existing cycle networks, ensuring they connect into and support the wider cycling network including on Grand Union Canal, National Cycle route 6 the cycle superhighway and Quietways programme.
11. Transport policy 6 roads and streets	Good access roads are needed to encourage access to the new station. S/he then asked if it will be on the western or eastern side	1	Resident	Noted. The policies in the transport chapter and in the relevant places promote the need for good connections to the stations within Old Oak and Park Royal
Connections	Widen canal tow path to provide enough space for pedestrians and good route for cyclists	6	Resident, local business, Local community Representative	Noted. OPDC will work with the Canal and River Trust to understand the possibilities for cyclists and pedestrians using the canal towpath. OPDC will also investigate alternative east-west cycle routes.
11. Transport policy 7 Car parking	Need to stop developers building basement car parks to get around permit restrictions	1	Resident	No change proposed. Residents will be restricted from applying for new and existing CPZs. Basement car parks will be required in some cases.
11. Transport policy 2 walking	better lighting and pedestrian crossings that aren't underground would improve the safety when walking around later in the evening and winter	1	Resident	Noted. T2 promotes well-lit walking routes.
11. Transport policy 6 roads and streets	Concern about road speeds	1	Resident	Noted. T1 seeks to implement maximum speeds of 20mph on all local roads.

Transport spending	A resident asked how much is likely to be spent on construction from start to finish. A figure of 25-30 billion was provided. The resident then asked how much of this will be spent on public transport to which an approximate figure of 2 billion was given. The resident replied 'that's about 10 percent, is that enough, is this a standard percentage for such developments?'	1	Resident	Noted. The infrastructure requirements and costs (where known) to support the needs of development are outlined in the IDP.
11. Transport policy 2	As a pedestrian it would also help if there was a raised area for where cars and cyclists are to stop cyclists going into lorries	1	Resident	Noted. Policy T2 supports the need for safe walking environments across Old Oak and Park Royal and facilities that protect pedestrians from other road users.
11. Transport policy 3	A resident suggested in their opinion for very low traffic roads you do not need separate cycle structure. In the Netherlands the middle dash line is removed and cycle lanes are around the edge as long as the road speed is slow. This means enough space for two bikes and a car to pass at same time	1	Resident	No change proposed. Not all cycle facilities will be segregated. Policy T3 indicates the need for safe, convenient, comfortable and attractive cycle networks. The cycling strategy and policy T3 identifies indicative locations where segregation could be considered. This will need to be developed further as proposals come forward.
11. Transport policy 3	Safety is main barrier to cycling and walking. Need to make cycling safer	5	Resident	Noted. Policy T3 indicates the need for safe, convenient, comfortable and attractive cycle networks across Old Oak and Park Royal. The cycling strategy and policy T3 identifies indicative locations where segregation could be considered. This will need to be developed further as proposals come forward.

11. Transport policy 3	A resident commented about bike hire schemes in Ealing and repair stations being dotted around the area with posts with a pump and alum key permanently in place which are quite handy.	1	Resident	Noted. T3 outlines that proposals at key nodes should be accompanied by high quality and secure infrastructure, which could include repair stations and pumps. The extension of cycle hire to Old Oak and Park Royal is supported in T3.
11. Transport policy 3	A representative of a community group who cycles said 'getting Boris bikes out here may be a challenge but the above may work here, a private hire option'	1	Resident	Noted. T3 seeks to deliver and/ or contribute towards the provision of cycle hire across Old Oak and Park Royal, including from independent providers.
11. Transport policy 3	Better cycle storage required, including at stations, ecocycle?	3	Resident, local community representative, business	Noted. T3 seeks to provide high quality, secure, well located, convenient and accessible cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the standards set out in the London Plan. OPDC will also look to support independent cycle providers for a range of cycle needs which could include EcoCycle.
Connections and route hierarchy	A local resident explained that Red Route 2 is not going to be vehicular and asked why is it designated a primary route	1	Resident	No change proposed. It is not clear what is meant by "Red route 2"
11. Transport Policy 6 Roads and streets	A local resident stated that there is a plan to convert Victoria Road in to a dual carriageway and s/he is worried that if this is to happen 'the junction with Atlas Road and Old Oak Common road will be gridlock'	2	Resident	No change proposed. Converting Victoria Road to a dual carriageway was a HS2 proposal; however, this is no longer being pursued. The Victoria Road Direction of Travel details current thinking regarding improvements to Victoria Road.
11. Transport Policy 6 Roads and streets	A local resident said s/he would like to 'strengthen the way in from North Circular Lane because all the jobs and homes there will cause issues'.	1	Resident	Noted. OPDC will work with the local highway authorities to investigate solutions for relieving traffic congestion

11. Transport Policy 6 Roads and streets	'Asda is another junction and there is no solution to that so far. Maybe the whole of the Asda site could be roundabout?	1	Resident	Noted. OPDC will work with the local highway authorities to investigate solutions for relieving traffic congestion and improving road conditions in Park Royal.
11. Transport Policy 6 Roads and streets	We need to get transport modelling right to ensure there is not absolute grid lock.	1	Resident	Noted. A consistent approach is taken across strategic modelling informing all growth areas and major developments.
11. Transport Car Parking	Even with 0.2 cars per dwellings I think it will be gridlock'	1	Resident	Noted. Policy T1, T2, T3 and T4 aims to ensure developments promote travel behaviours which are sustainable and reduce dependency on private vehicles. This will lead to reduced congestion.
11. Transport Policy 6 Roads and streets	Asda will be a central hub for Park Royal. At the moment there is no connection to Asda and everyone has to use private cars. There needs to be improvements to the roads	1	Resident	Noted. OPDC will work with the local highway authorities to investigate solutions for relieving traffic congestion and improving road conditions in Park Royal. OPDC will also promote the Healthy Streets approach to encourage and enable people to walk, cycle and use public transport.
11. Transport Policy 1	A local community representative thought the area was very dull; not somewhere you would go for a walk. S/he also felt the area was very traffic dominated, so it is difficult to walk	1	Local community representative	Noted. OPDC recognise the constraints and inaccessibility of existing pedestrian routes and therefore place great emphasis on the transport hierarchy of the area to reduce traffic and improve sustainable methods if travel.
11. Transport Policy 6 Roads and streets	S/he said the traffic gets congested in the centre at ASDA and at four points (marked on the map with a red cross; see photo). S/he said it is 'a box so you get trapped and can't get out, and that's without any construction traffic'	2	Resident, local community representative	Noted. OPDC will work with the local highway authorities to investigate solutions for relieving traffic congestion. The construction and logistics strategy will investigate solutions for minimising and mitigating construction traffic.

11. Transport Policy 6 Roads and streets	it would be nice to 'widen pavements and put trees back; walking should be a pleasure – it is important to make a nice walking environment'	1	Local community representative	Noted. T2 supports the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.
11. Transport Policy 2	levels for walking are important as big gradients can deter walking	1	Charity Representative	Noted. T1 outlines that the street network must be accessible for all users, ensuring that gradients of at least 1:20 are designed in from the outset.
11. Transport Policy 2	Stonebridge Park is just within the area but the station is just outside the crossing of the railway line and the North Circular crossing comes within the boundary in terms of pedestrian access. There is quite a nice bridge across the North Circular, it's the only one in Brent, try and use that to encourage walking and cycling	1	Local community representative	Noted.
11. Transport Policy 2	Open spaces are important for considering walking as people like to walk through open spaces. They added if you want to encourage walking then link up open spaces with walking routes, make these walks nice, 'green corridors'	1	Resident	Noted. T2 acknowledged that walking provision should be safe, well lit, comfortable, coherent and attractive in line with the Healthy Streets Indicators. Policy T1 outlines the importance of a coherent street networks and the creation of green streets
11. Transport Policy 2	Previously there used to be a railway footpath North Acton station to the north western corner to the scrubs, the current map does not really show this'	1	Resident	Noted. All walking routes will be displayed on the walking map
Connections	East-west routes are very important	1	Resident	Noted. OPDC is proposing a number of east-west routes in Old Oak and Park Royal. These are shown in the street network map.

11. Transport Policy 2	'walking policies should focus on high quality safe and accessible walking routes this will involve enhancing existing routes'	1	Resident	Noted. OPDC recognises the importance of safe and accessible walking routes and T2 supports developments that deliver or contribute towards new and enhanced walking infrastructure. T2 also supports the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.
11. Transport Policy 2	A local community representative said s/he 'would not walk down Coronation Road. It's far too congested with over spill from the businesses. It's not controlled or monitored or pleasant to walk' S/he went on to explain that what it needs is 'a decent walking surface and something pleasant to look at'	2	Local community representative, resident	Noted. T1 and T2 acknowledge that the development within Park Royal presents an opportunity to enhance the existing and provide new environments for pedestrians across and into the wider surrounding area.
11. Transport Policy 2 and 3	A local authority officer asked if you could have paths designated for both cycling and walking	1	Local authority officer	Noted. Policies T1, T2 and T3 identify the need to plan streets which encourage walking and cycling.
11. Transport Policy 2	A local community representative from a waterways group said 'no' [referring to ped-cycle shared space] because there are pinch points; there is not the width. S/he suggested it may be okay for leisure cycling, but not commuter /fast cycling, which is dangerous	2	Local community representative	Noted. OPDC will work with the Canal and River Trust to understand the possibilities for cyclists using the canal towpath. OPDC will also work with developers to secure alternative -east-west routes through the area, delivered as part of the Healthy Streets network.
11. Transport Policy 2	Concern over taking vegetation away from the canal	1	Local community representative	Noted. Policies T1, EU2 and EU3 support urban greening measures to support biodiversity and sustainable urban drainage along key routes. In addition, OPDC will support development where green streets / corridors are provided.

Transport Policy 3 Cycling	Cycle routes for fast commuting, canal towpath for leisure cycling	5	Local community representative	Noted. T3 outlines that the cycle network should have both “quietway” and “superhighway” routes for the needs of different cyclists.
Transport Policy 3 Cycling	Cyclists travel too fast	4	Resident	Noted. Policy T3 aims to ensure that cyclists of all abilities have adequate facilities and do not impede on other road users
Transport Policy 3 Cycling	Need more cycle routes	1	Resident	Noted. T2 supports the ongoing delivery of cycling infrastructure. Developments will be supported where they deliver and/ or contribute to new and existing cycle networks.
Transport policy 1	Need to improve walking and cycling as you cannot drive or park	1	Business	Noted. T1, T2 and T3 support the improvement of walking and cycling infrastructure across Old Oak and Park Royal.
Transport Policy 3 Cycling	A local resident said that ‘the cycle lane standards that the OPDC and TfL have provided the developers for the Genesis site with is not adequate. This is the first opportunity to tell developers what you want, and you have seemed to have failed. Why didn’t you specify a wider corridor?’	1	Resident	Noted. The road running through the Genesis (Oaklands) site is adequate for the demand created by the development and can be adapted in the future if and when demand changes.
Transport Policy 3 Cycling	Support for dedicated cycle lanes on Scrubs Lane - think this may be somewhere else	2	Resident	Noted. OPDC will support the provision of segregated facilities for cyclists, where it is appropriate and feasible to provide them.
Transport Policy 3 Cycling	‘there is a lot of pollution of cyclists carrying on the pavements we want to discourage that’	1	Resident	Noted. Through the policies in the transport chapter and the environment chapter, OPDC is aiming to encourage residents, employees and visitors to reduce their dependence on private cars which will lead to less traffic and air pollution.

Transport policy 7 Car parking	More parking needed for residents	3	Resident	No change proposed. Old Oak and Park Royal will become one of the most accessible locations in the UK when the proposed transport investment is delivered. The levels of parking associated with new development is appropriate to the wider aims and objectives of the area. This is supported by the Strategic Transport Strategy and the independent car parking study.
Transport policy 6 Roads and Streets	The roads in Park Royal were not designed to cope with the level of traffic it now experiences, or lorry volumes	2	Local community representative	Noted. OPDC will work with the local highway authorities to improve the roads within Park Royal to support businesses and improve the environment for residents and employees.
Transport policy 6 Roads and Streets	it should not be down to private developers to deal with the traffic issues. State development needs to do this and then everyone will benefit'	1	Local developer	Noted. The transport policies promote development which enables travel behaviours aligned to the Healthy Streets approach. T7 and T8 promotes the need for development construction and servicing to be undertaken in a way that minimises the impact on the road network.
Transport policy 6 Roads and Streets	lack of new roads to link the development to the primary routes of the A40 and particularly the A406 to the north/north west.	1	Resident	Noted. OPDC will work with the local highway authorities to improve traffic conditions on strategic roads to improve access and egress to and from Old Oak and Park Royal
Transport policy 1	Need to create an environment where the car is not required	1	Resident	Noted. Policy T1 promotes the healthy street approach to enable and encourage walking, cycling and public transport use and reduces dependency on the private car. Policies 2-6 continue to emphasise and support this.
Transport policy 7 Car parking	Increase commercial parking ratio	1	Resident	No change proposed. Policy T4 indicates that non-residential development should be car-free except where a business or operational need justifies additional parking.

Transport policy 7 Car parking	Support for electric vehicle policy	1	Resident	Noted. T4 places the importance of any parking spaces providing electric charging points for vehicles.
Transport policy 6 Roads and Streets	Could the public be re-consulted on the design of the streets once these parts start developing?	1	Resident	Noted. Through the development management process members of the public will have an opportunity to comment on development proposals being delivered which will include street layouts.
Transport policy 6 Roads and Streets	"I broadly agree with your aims, but there is so much room for interpretation for when it comes to the design. Please refer to RBKC Kensington High Street which has been decluttered and looks much better. Don't let functionality get in the way of good design."	1	Resident	Noted. OPDC are committed to ensuring design and layout of new streets and public realm is of world class standard, using the Healthy Streets Checklist to score the detailed designs of new and improved streets.
Transport T4 Rail	Important that there is a tube station at Old Oak	1	Resident	Noted. There are currently two underground stations in Old Oak: North Acton and Willesden Junction and there are plans for a new Elizabeth Line station as part of the Old Oak Common station.
Transport T4 Rail	Interchange needs to be seamless between stations	1	Resident	Noted. T3 places importance on appropriately managing interchange requirements across all modes.
Transport T4 Rail	Important to have a tube station at Hythe road	1	Resident	Noted. This is indicated in T4 and in the Old Oak North place. OPDC will work with TfL and Network Rail to investigate the feasibility of delivering Hythe Road station.
Transport T2 Walking	Need good lighting, safe surfaces that are not slippery when wet, pedestrians given priority over cars in heavily trafficked areas to encourage walking	1	Resident	Noted. Policy SP7 includes OPDC's Sustainable Transport Hierarchy, which seeks to prioritise pedestrians. T2 supports the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.

Transport T2 Walking	Prioritising pedestrian transport over cars.	1	Local business	Noted. T2 acknowledges the importance of strong and legible walking networks to deliver an environment suitable for pedestrians.
Taxi	Encouraging shared transportation especially taxi schemes. Loosen the monopoly of the black cab and minicabs over london transport.	2	Local business	Noted. The policies in the transport chapter and in SP7 emphasise the need for people to travel sustainably and reduce dependency on private vehicles. This includes providing car club bays and taxi ranks where required and appropriate.
Transport T3 Cycling	needs to be flexiblity in build so that routes can be adjusted once the proposals get built.	1	Local business	Noted. The policies indicate the need to transport proposals to be adaptable for future needs and travel demands.
11. Transport. Policy 3 cycling.	With reference to Figure 110 - The blue lines showing the 'existing cycle network' contain a wide variety of different types of infrastructure. It would be useful if this could be broken down into sections that are of reasonable quality and those that need significant upgrade. The canal and the sections of off-carriageway cycle tracks, for example, could be shown as good existing sections – it might also be clearer if the canalside Quietway was shown in a different colour. Other roads (e.g. Acton Lane, Scrubs Lane, Old Oak Lane) have very poor, intermittent provision on pretty busy roads and so should be marked as 'needing upgrade'. All existing cycle infrastructure should be marked on the map. For example, there is a north-south 'green link' on the TfL cycle guide maps running via Park Royal station and Masons	2	GLA, TfL	Noted. The Public Realm, Walking and Cycling Strategy provides an assessment of the cycle routes according to the LCDS guidance. The cycle network map has been updated for the Regulation 19 version of the local plan.

	Green Lane. This includes a bridge crossing the railway line and allowing access to Coronation Road to the north. This is not shown on the map, but it provides the only crossing of that railway line for quite some distance. The map also appears to be missing notation of existing or potential cycling routes in the Park Royal area. Although there are more constraints imposed by the existing road network there should be an indication of secondary and tertiary streets that are suitable for cycling or can be improved to make them safe for cycling. There should also be an indication of how barriers to cycling caused by primary routes and other infrastructure around the edge of the area will be overcome.			
11. Transport. Policy 1.	Should prioritise the resolution of existing transport problems within Park Royal and Old Oak.	1	GUA	Noted. OPDC's Local Plan and IDP identifies a number of infrastructure requirements related to the existing transport network, as well as new pieces of transport infrastructure to support the needs of development
11. Transport. Policy 2 Walking	A positively planned proactive programme of proposals should be prepared to support the walking policy. This should be signposted in policy.	1	GUA	Noted. A range of walking improvements are detailed in the IDP, supported by the walking policy and detailed in the relevant places.

11. Transport. Policy 2 Walking	Concept of lifetime neighbourhoods should be applied. The same principles should be applied to the business areas. Connectivity with neighbouring districts is particularly important.	1	GUA	Noted.
11. Transport. Policy 2 Walking	Policy should ensure that the lighting of walking routes is fit for purpose. It is suggested that walking routes should be well-lit, but not over-lit, to keep within 'dark skies' design guidelines. Exceptions at perceived danger spots can be made.	2	GUA, resident	Noted. Policy D6 seeks to ensure that any lighting does not result in light pollution.
11. Transport. Policy 3 Cycling	A positively planned proactive programme of proposals should be prepared to support the cycling policy. This should be signposted in policy.	1	GUA	Noted. A range of cycling improvements are detailed in the IDP, supported by the walking policy and detailed in the relevant places.
11. Transport. Policy 3 Cycling	Local knowledge suggests that there is a redundant freight railway tunnel under the A40, just west of the parallel Central Line tunnel that could be made into a cycling route.	4	GUA, resident, resident	No change proposed. OPDC's Public Realm, Walking and Cycling Strategy has informed OPDC's approach to cycle infrastructure in the area. This is not being identified as a piece of infrastructure required to support the needs of development currently.
11. Transport. Policy 3 Cycling	Another suggestion is to turn the existing unused bridge over the Central Line (West Ruislip branch) into a tunnel for a cycling network	2	GUA, resident	No change proposed. OPDC's Public Realm, Walking and Cycling Strategy has informed OPDC's approach to cycle infrastructure in the area. This is not being identified as a piece of infrastructure required to support the needs of development currently.
11. Transport. Policy 6 Roads and Streets	Old Oak High Street should be accessible only to pedestrians and cyclists with certain essential sections being accessible to buses.	1	GUA	No change proposed. There are a number of benefits to Old Oak High Street being served by buses as well as a pedestrian and cycling route and where feasible, other vehicles.

11. Transport. Policy 6 Roads and Streets	Grand Union Street should not be a primary route.	1	GUA	Noted.
11. Transport. Policy 6 Roads and Streets	Through routes in Old Oak North and South should be minimised.	1	GUA	Noted.
11. Transport. Policy 6 Roads and Streets	Provide the main eastern entrance to the Old Oak Common Crossrail HS2 station with a direct road connection to Scrubs Lane.	1	GUA	Noted. Connections from Old Oak Common station are being investigated.
11. Transport. Policy 6 Roads and Streets	Support for a connection from HS2 to the scrubs further east	2	Resident, local community representative	Noted. Connections from Old Oak Common station are being investigated.
11. Transport Policy 7 Car parking	Controlled parking zones within Park Royal should target all-day parking, not the daytime visits that underpin the economic activities of the area.	2	GUA, resident	Noted. CPZs in Park royal are under the jurisdiction of the local highway authority
11. Transport Policy 3 Cycling Figure 110	Fig 110 should show a possible cycle route north towards Harlesden along Station Road from the existing cycle route at Willesden Junction.	1	Harlesden Neighbourhood Forum	Change proposed. The cycle network figure has been updated.
11. Transport policy 6 roads and streets	Provide a traffic route from Scrubs Lane near its junction with Harrow Road to Old Oak Common Lane. This would relieve both Tubbs Road and Nightingale Road from traffic that currently uses these residential roads as a ‘rat-run’ to Park Royal via Station Road and Old Oak Common Lane.	1	Harlesden Neighbourhood Forum	No change proposed. The transport policies and SP7 encourage a modal shift from travelling by private car to walking, cycling and public transport use which will reduce congestion.

11. Transport policy 2 walking	GWML concourse could be a bridge or an underpass- this is being investigated but the plans all show the concourse as an underpass. HS2 preferred option is that it is a bridge.	1	HS2	Change proposed. This is now shown as a connection.
11. Transport policy 2 walking	The indicated North Action-Old Oak link seems indirect and poorly calculated to promote the aims of this policy.	2	LBE, resident	No change proposed. The link has been developed to concept design based on technical feasibility and desire lines
11. Transport policy 1	Policy option doesn't include disabled users	1	LBHF	Change proposed. Policies SP9 and D3 require all development to be accessible and inclusive for all.
11. Transport policy 6 roads and streets	Road design principles- the following documents to be considered: MfS 1 and 2; TfL's Streetscape Guidance; London Cycling Design Standards Guidance; Kerbside Loading Guidance; Accessible Bus Stop Design Guidance;	1	LBHF	Noted.
11. Transport policy 6 roads and streets	• It is understood the OPDC has powers to adopt private streets as part of the public highway. Local Plan should reflect the need for LBHF to be involved in any decision to adopt highways	1	LBHF	No change proposed. T1 requires all roads to be designed to adoptable standards. The decision for highway authorities to adopt streets will need to be considered on a case by case basis. OPDC is not the Highways Authority for the area – this responsibility remains with the host local authorities.
11. Transport policy 1	The capacity of the road network in the OPDC area is under strain already. Questions Optimising growth policy because of this	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. The transport policies and SP7 encourage modal shift from travelling by private car to walking, cycling and public transport use which will reduce congestion. The construction and logistics strategy will investigate options to minimise construction related impacts on the road network.

11. Transport	The transport section (of the Draft Local Plan) is seen by local residents and businesses as over-optimistic in its assumptions.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. OPDC has worked with TfL, GLA and the local boroughs to produce the transport strategies which provide the evidence base for the transport policies.
11. Transport	Concern over taxi use and small van deliveries in Car Giant site	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. OPDC will work with the developer of the Car Giant site to manage the demand for taxis and mitigate the impact of servicing requirements on the road network.
11. Transport policy 1	Preferred policy option T1 (Strategic policy for transport) is supported as an aspiration, but is seen as unachievable unless either the OPDC housing and employment targets are reduced, or a more radical set of changes to the road network are introduced.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. OPDC's transport studies have assessed the likely impacts of development on the transport network. This has identified appropriate policy approaches, which have been embedded in the Local Plan and necessary infrastructure requirements which are identified in the Local Plan and in the IDP.
11. Transport policy 3 Cycling	Use by cyclists of the southern towpath to the Grand Union Canal already causes some conflict with pedestrians and will need careful design provisions.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. OPDC will work with the Canal and River Trust to understand the possibilities for cyclists using the canal towpath. The Public Realm, Walking and Cycling Strategy also identifies alternative east-west cycle connections, which have been identified in the Local Plan.
11. Transport policy 3 Cycling	Suggest a segregated cycle route at the eastern border of Wormwood Scrubs, connecting with the Westway section of the East West Cycle Superhighway.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Change proposed. The segregated cycle lane on Scrubs Lane proposed in the Scrubs Lane Development Framework Principles connects to the East-West cycle superhighways route.
11. Transport policy 6 roads and streets	we are concerned that the new street pattern shown in the Local Plan may create new problems.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. The street network map has been updated.

11. Transport policy 6 roads and streets	'Grand Union Street' running east/west through Old Oak South is referred to as a 'street' but it is not clear whether it will be available as a through route for cars or limited to buses and cycles? In our view a through route is neither necessary, or welcome at this point.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. The street network map has been updated.
11. Transport policy 6 roads and streets. Fig 32	Figure 32 also shows a 'main street' running east west on the northern boundary of Wormwood Scrubs? Is this intended as a through route, taking traffic off Du Cane Road and the Harrow Road (both already congested at peak times)? If so, it would swiftly be filled with traffic and would harm the northern boundary of the Scrubs	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. The street network map has been updated.
11. Transport policy 6 roads and streets. Fig 32	The RB Kensington and Chelsea 2015 Consolidated Local Plan includes two policies as sub-paragraphs of its Policy CR1 on the Street Network. We see both as worthy of consideration by the OPDC. • Require new streets to be built to adoptable standards • Resist the gating of existing streets and the development of new gated communities	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Change proposed. Policy added to T1 to ensure streets are built to adoptable standards.

11. Transport Policy 7 Car parking	Differential parking standards are proposed for the Park Royal area. It is not clear how this is going to be achieved between Park Royal where parking is available to employees and residents, and the new Old Oak where there is very little parking.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Change proposed. The parking policy has been updated to be consistent between Park Royal and Old Oak
11. Transport policy 1	The impact on traffic in Wood Lane/Scrubs Lane of 50,000 sq ft of further retail space at Westfield 2, the St James development, the Stanhope development at the former BBC Television Centre and the two large sites under development by Imperial College, has yet to make itself felt.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. Growth assumptions were included in OPDC's Old Oak Strategic Transport Modelling Study.
11. Transport policy 2 walking	A neighbourhood plan for Old Oak will provide a good vehicle for detailed consultation and refinement of walking routes.	1	Old Oak Interim Forum	Noted.
11. Transport evidence base	concerns regarding the consistency of some of the evidence base that supports the emerging transport policies. Due to the broad range of documents and specific technical points that arise, we have appended to these representations a note prepared by I Cube and Arup that consolidates and expands comments related to the various documents underpinning the Local Plan.	1	Old Oak Park (DP9)	Noted.

11. Transport policy 3 cycling	Amend b to state “Provide new and enhance and provide links to existing, cycle connections to ensure they are safe, convenient and direct, but not to the detriment of pedestrians where feasible”	1	Old Oak Park (DP9)	Change proposed. Policy has been updated
11. Transport policy 3 cycling	Amend c to state “implement signage to improve cycle wayfinding and legibility where appropriate”	1	Old Oak Park (DP9)	Change proposed. Policy has been updated
11. Transport Policy 3 Cycling Figure 110	Figure 110 to be explicitly titled Illustrative Cycle network	1	Old Oak Park (DP9)	Change proposed. Cycle network map has been updated.
11. Transport Policy 6 Roads and streets	We are supportive of the overall objective of policy T6 but it should be recognised in the policy wording that the some of the aspiration in a) to e) may only be achieved in instances where it is feasible to do so.	1	Old Oak Park (DP9)	Noted.
11. Transport Policy 7 Car parking	Think electric vehicle policy should be in line with London Plan policy rather than current wording	1	Old Oak Park (DP9)	No change proposed.

OOSTS	Background Growth – the approach treats development outside the OA as being implemented ahead of all development in the OA (i.e. this external development has first call on available transport capacity). This appears to be contrary to the idea of a "development pipeline". In Section 6.2 the report states that "it is not considered that the OOCOA related development will be expected to mitigate the impact of this background growth on the transport network" but it is not clear how this will be achieved in practice through the DIF process which more crudely allocated infrastructure to funding streams. A counter-balance to this approach would be to also test the situation where development in Old Oak occurs ahead of all other London Plan growth assumptions or alternatively the analyses could have tested a series of phases based on, say, 2026, 2031 and so on which would also start to shed some light on issues of the phasing of works. The current modelling phase for OOP may assist in this process;	1	Old Oak Park (DP9)	No change proposed. The background growth assumed in the strategic modelling is aligned to the London Plan. A consistent approach is taken across strategic modelling informing all growth areas and major developments. It's unrealistic to assume no growth in London until Old Oak growth occurs.
OOSTS	Validity of Input Assumptions – the specification of the input assumptions can have a critical bearing on the outcomes. There are a number of areas that do not reflect the situation at Old Oak	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL are of the view that the work undertaken is sufficient to inform the Local Plan.

OOSTS	Transport Supply in the 2031 Reference Case – whilst we understand the technical grounds for excluding the Overground station and Crossrail Extension to the WCML from the Reference Case, they are inherently part of the HS2 mitigation strategy being recommended by TfL and so should form part of the Reference Case including HS2 rather than the With Development scenario even if the Reference Case consisted of two alternative futures	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL are of the view that the work undertaken is sufficient to inform the Local Plan.
OOSTS	Committed Infrastructure – the study takes as a given that the HS2 scheme will be delivered as planned and programmed in 2026. However, it is not in reality a committed scheme in the same way that Crossrail is and therefore it is possible that it may not happen or be delayed to a later date. Given the close inter-relationship between the scheme and the release of many sites to the south of the OA, it would seem appropriate for the study to also test non-HS2 scenarios with modified land use assumptions	1	Old Oak Park (DP9)	No change proposed. The HS2 station now has Royal Assent and therefore is committed in the same way as the Crossrail service is.

OOSTS	Mode Split Assumptions – the assumptions applied to the base With Development tests appear inconsistent with the parking standards proposed in the OAPF of a maximum of 0.2 spaces per household and close to zero commercial parking. This appears to create an initial expectation of high traffic demands which is contrary to emerging planning policy and seems to colour the thinking in the mitigation proposals later in the report which anticipate high traffic demands.	1	Old Oak Park (DP9)	No change proposed. The modal split assumptions applied to the base were consistent with the OAPF maximum of 0.2 spaces per household.
OOSTS	Testing a Single Development Scenario – the study focuses on a single development scenario on the basis of the assertion that "this appeared to present the optimum development scenario for the area" based on the results from the initial set of tests. It is entirely possible, given the results of the later, more appropriate, sensitivity tests, that higher levels of development (or different mixes or distributions) may well be sustainable in transport terms either within the package of measures considered or with further incremental enhancements. Indeed, the Development Capacity Study (DCS) proposes higher development levels than tested in the STS; and	1	Old Oak Park (DP9)	Noted. The assessment is sufficient for the purposes of the local plan. Individual proposals would also need to undertake their own assessments of impact on the transport network and provide appropriate mitigation measures.

OOSTS	Testing a Single Mitigation Package – a single package of measures is identified in response to the With Development tests and with limited "high level" and primarily qualitative appraisal. This is then tested against the High PT mode share demand scenario as a combined package (i.e. an "all or nothing" approach). Consequently, the study does not critically review whether the key interventions are effective, offer value for money or could be achieved in other ways.	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL are of the view that the work undertaken is sufficient to inform the Local Plan.
OOSTS	Concerns that the study currently does not adequately isolate the transport mitigation measures necessary to support the development scenario rather than London-wide growth and change	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL are of the view that the work undertaken is sufficient to inform the Local Plan.
OOSTS	Concerns that the study creates a high baseline for the traffic demands generated in the area on the basis of parking standards contrary to the Local Plan and then promotes a traffic strategy on this premise despite later reducing traffic volumes appreciably to more reasonably reflect demand management and package strategies	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL are of the view that the work undertaken is sufficient to inform the Local Plan.
OOSTS	Concerns that the study attributes transport mitigation measures associated with HS2 to the local development and does not consider what could happen if HS2 does not proceed as planned; and	1	Old Oak Park (DP9)	No change proposed. The HS2 station now has Royal Assent and therefore is committed

OOSTS	Concerns that the study does not test the key mitigation components in a disaggregate fashion to determine their incremental value to the overall scheme.	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL are of the view that the work undertaken is sufficient to inform the Local Plan.
Connections: Hythe Road	Old Oak Park is proposing to create a new access on Hythe Road which will replace the existing constrained underpass. We do not believe that the development's traffic demands require a second trafficked-route or that the current access should be reserved for buses and station-related traffic which may constrain options for supporting the development's accessibility. We intend to use the existing access to support pedestrian and cycle movement alongside emergency access if needed;	1	Old Oak Park (DP9)	Noted. The local Plan only proposes one vehicular (trafficked) connection off Scrubs Lane into Old Oak North
Connections: Hythe Road	The merits of a comparatively permeable local network are appreciated but we do not consider it to be in the best interests of Old Oak Park as a new residential-led neighbourhood to cater for intensive traffic demands related to the station nor to facilitate a rat-run which is contrary to the stated goals of the STS and draft Local Plan.	1	Old Oak Park (DP9)	Noted.

Bridges over the canal	promotes the idea of two trafficked crossings of the canal to link Old Oak North and South, one of which is considered to be prioritised for bus access to HS2. There is insufficient detail in the report to determine whether a second traffic crossing is justified and on what grounds. Further discussions will need to take place in due course but with the evidence available to date we believe that a single trafficked route to the south-west delivered in the early phases of development can adequately cater for all highway demands.	1	Old Oak Park (DP9)	Noted. The infrastructure requirements in the Local Plan have now been updated.
Old Oak Strategic Transport Modelling Study	The STS overstates the requirements for new highway infrastructure generally and promotes the use of the Old Oak Park site as a means for catering for traffic from the HS2 station and other developments which is detrimental to the interests of its new population and the principles of good place-making.	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL are of the view that the highway infrastructure solutions in the Old Oak Strategic Transport Modelling Study are required in order to provide adequate connections across Old Oak to encourage walking, cycling and bus use and provide required access to development sites. The exact form of those connections would be developed further as part of any proposals for the site.
PRTS	Car Occupancy – the report compares the travel to work occupancy of 1.06 per vehicle with what appears to be the average for all purposes for Outer London of 1.41. This is a misleading comparison as car commuting elsewhere is likely to demonstrate a similar low occupancy;	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL view the comparison of the car occupancy in Park Royal with the Outer London average to be fair given that Park Royal is viewed as being situated in Outer London.

PRTS	Car Dependence – it is suggested that the high car mode share for travel to work is a product of a number of factors but fails to mention what is probably the most significant factor which is the high availability of free, long-stay parking in the area. The report later identifies some 20,500 parking spaces with at least 16,700 available for circa 30,000 employees which enables a mode share by car of 50-60% as found in the Census material. Without addressing this issue it will be very difficult to make meaningful in-roads into the high use of cars and low use of public transport and slow modes;	1	Old Oak Park (DP9), Resident	Noted. There are now detailed recommendations for Park Royal that seek to intensify the site. OPDC will work with the host local authorities to consider the potential for CPZs and reduced car parking spaces.
PRTS	Mode Shares – the reported "low" mode shares for other modes needs to be viewed in light of the high car mode share noted above. If car use was more heavily suppressed, then they would implicitly rise despite the local issues acting to reduce their attractiveness. It would perhaps be a useful comparison to put the Park Royal mode shares into context against other west London industrial areas and to break Park Royal into smaller zones and examine the performance of each in these terms as the balance between accessibility and parking provision is bound to vary across the large area of Park Royal;	1	Old Oak Park (DP9)	Noted. The recommendations from the Park Royal Transport Strategy aim to facilitate and encourage a modal shift away from private car use to more sustainable modes.

PRTS	Parking – the study usefully estimates parking availability in Park Royal. It suggests that there is substantial commuter parking with a considerable portion of this activity occurring on-street rather than on private land. The report indicates that the subdivision between on- and off-street parking has been estimated but this is not quoted. It would seem a significant factor to understand as the controls available to the authorities to progressively change the availability of parking will be governed by this;	1	Old Oak Park (DP9)	Noted. OPDC is working with the two local authorities to improve the parking controls which could be introduced in Park Royal to reduce the level of on-street parking and free-up road space for other road users and improved public realm.
Park Royal Places	It would be helpful, given the large expanse of Park Royal, to explicitly identify where future growth is expected. The positioning of this development relative to key transport nodes is significant and it is often the case that such development enables changes to the local network (for example, through the creation of new and improved linkages) that is not possible elsewhere	1	Old Oak Park (DP9)	Change proposed. The intensification study investigated locations for intensification in Park Royal and transport was a key consideration. This has informed the Park Royal places.
PRTS	The study should explicitly state the mode share by car for new development being applied in the modelling to forecast the change in traffic and how this relates to parking provision and the intensification of the developed sites	1	Old Oak Park (DP9)	No change proposed. The study uses the mode share modelling from the Old Oak Strategic Transport Modelling Study.

PRTS	The long-list of possible interventions is fairly comprehensive and uncontroversial but lacking in specific details to make it particularly useful except for the highway works which seem to have been given more thought and study. We would have anticipated that particular schemes would have been identified – such as alternative packages of bus interventions – and their broad effects established to allow the consultee to draw meaningful conclusions.	1	Old Oak Park (DP9)	Noted. The Park Royal Transport Strategy interventions will be developed into more detail in the future. The bus strategy drew on information from the PRTS to develop the indicative route network which is shown in policy T6.
PRTS	The assessment and scoring system is a weak basis to filter interventions. It is highly subjective and lacking in substance. It is also impacted by the original ten objectives which overlap to a degree and are treated as having equal weight. It is possible for interventions to score highly by being rated highly in multiple duplicated categories without any real account taken of the realism and practicalities involved	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL are of the view that the work undertaken is sufficient to inform the Local Plan.
PRTS	The listing of many independent interventions also fails to give a sense of a coherent and focussed strategy to achieve a given set of key objectives, despite its description as a “strategy”.	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL are of the view that the work undertaken is sufficient to inform the Local Plan.
Connections: To south of canal	Vital that a clearer solution showing connection to the south of the canal is identified.	1	QPR (NQP Development Services)	Noted. Connections to the canal towpath are supported, where appropriate and feasible.

Infrastructure plan/ connections	Require a clearly defined road infrastructure plan showing routes to and from HS2/Crossrail, Hythe Road and Old Oak Common Lane.	1	QPR (NQP Development Services)	Change proposed. The road network figure shows routes and connections from the stations in Old Oak and Park Royal and these are detailed in the relevant places chapters.
11. Transport Roads and Streets	There needs to be adequate means of access and egress to the OPDC area. On this basis we consider the proposed upgrading of Old Oak Common Lane and Scrubs Lane to be completely inadequate.	1	The Hammersmith Society	Noted. Further work has now been undertaken as part of the Victoria Road and Old Oak Lane Development Principles to identify proposals for these routes and requirements have been embedded in the Local Plan.
11. Transport Roads and Streets	A policy should be added to address existing traffic problems, in particular on the north-south axis. This is an acute problem for the area and simultaneous congestion in Scrubs Lane and Old Oak Road can lead to the development area effectively being cut off at peak times. Any such policy should prioritise bus lanes.	1	The Hammersmith Society	The transport policies and SP7 encourage a modal shift from travelling by private car to walking, cycling and public transport use which will reduce congestion. Policy T1 also includes the need to alleviate traffic congestion.
11. Transport Policy 6 Roads and streets	First Central could not afford the proposed fly over the A40 - for West bound traffic leaving Park Royal. They ended up putting in a 'U' Turn on the A40 – when there was a scheme on the table, to tunnel the A40 under Gypsy Corner junctions, making the West Way 'non-stop' out of London.	1	West Twyford Residents' Association	Noted. TfL have investigated a range of solutions for the A40.
11. Transport Policy 6 Roads and streets	We suffer traffic congestion on Twyford Abbey Road / Abbey Road and Rainsford Road in our area at peak times, and yet no proposals shown, will alleviate this situation with	1	West Twyford Residents' Association	Noted. The transport policies and SP7 encourage modal shift from travelling by private car to walking, cycling and public transport use which will reduce congestion. Policy T1 also includes the need to alleviate traffic congestion.

	the predicted increases in traffic movement.			
11. Transport Policy 6 Roads and streets	Transport plans and solutions to problems should consider the traffic situation at the completion of the Project and allow capacity / space for 'final' schemes. Solutions should not be based on current capacity figures.	1	West Twyford Residents' Association	Noted. The transport strategy modelling considered the need in future years factoring in background growth and the projected development needs.
11. Transport Policy 3. Figure 110	There is no cycle way on Twyford Abbey Road – as shown on your Figure 110 'Cycle Network', and is there enough space within the road network for the proposed yellow cycle network proposed on figure 110 in Park Royal – see Figure 125 which is a typical estate road.	1	West Twyford Residents' Association	Change proposed. The cycle network figure is being updated.
11. Transport Policy 3. Figure 110	There is only one side of the Grand Union Canal accessible. It is very limited in width. To make it a two-way cycle path and walkway will require extensive widening – including under existing bridges.	1	The Hammersmith Society	Noted. OPDC will work with the Canal and River Trust to understand the possibilities for cyclists using the canal towpath. OPDC's Public Realm., Walking and Cycling Strategy also identifies alternative east-west cycling routes, which have been appropriately embedded in the Local Plan.

11. Transport Policy 6 Roads and streets	Harlesden Bypass proposal -The OPDC will be aware of the possibility (merely that) of a through-road (of sorts) from the North Circular Road at Abbey Road underpass. It would run in some form to the central Old Oak Common area, via Premier Park Road, Waxlow Road, the National Grid site, an underbridge on the Dudding Hill Freight Line, Atlas Road, and the northern part of Old Oak Common Lane.	1	Resident	Noted. This proposal has not been investigated in detail to date by OPDC. LB Brent would implement such a proposal as the local highway authority.
11. Transport Policy 6 Roads and streets	Is the OPDC willing to discover the long-term plans of National Grid, regarding each building and facility on its Acton Lane site, and whether a potential route for a road and new bridge over the Grand Union Canal sometime in the next twenty years can be identified?	1	Resident	No change proposed. The facility is required for operational purposes, but if this ceased, OPDC would work with DEFRA to consider alternative uses.
11. Transport Policy 1	We need to consider the needs and methods of both people and freight transport from first principles, and design Old Oak Common, and increasingly Park Royal, for the current and imagined requirements of the next 10 to 100 years.	1	Resident	Noted. The transport policies encourage effective and integrated management of streets to future-proof for changes in the surrounding context, life-style and technological changes. Policy T8 promotes the implementation and safeguarding of future innovative and smart technologies in relation to freight, servicing and delivery that maximise the efficiency and interoperability of the transport network.
11. Transport Policy 1	Decking proposals provide new transport opportunities- which should be maximised, but not encourage more vehicle use	1	Resident	Noted. OPDC's Local plan promotes healthy street environments that encourage walking, cycling and public transport use and reduced dependency on private cars.

11. Transport Policy 1	Mechanised vehicles on busy public thoroughfares are not out of place, as long as their number do not detract from attractive and safe street-scenes, where walking and cycling are given the highest priorities.	1	Resident	Noted. SP7 and Policy T1 promote attractive and safe streets which prioritise walking and cycling.
11. Transport Policy 4: London Overground interchange with HS2	The announcement by the OPDC of a concrete raft over the Crossrail depot, with the same assumed addition over the HS2 station and elsewhere, will change transport policy. It will reduce severance for walking and cycling. However, it also needs to reopen consideration of the location of London Overground tracks and stations, because the published governance procedures used by Transport for London clearly no longer apply and previous decision-making would likely fail legal challenge.	1	Resident	Noted. OPDC will work closely with stakeholders, such Department for Transport, High Speed 2, Network Rail, Transport for London and Crossrail to explore the potential for the relocation, reconfiguration and/or development above and around this infrastructure to realise the comprehensive regeneration of Old Oak South.
Transport policy 6 Roads and Streets	OOSTS does not sufficiently recognise local trip patterns	1	Resident	No change proposed. Local and strategic trips were investigated as part of the Old Oak Strategic Transport Modelling Study
OOSTS and PRTS	The PRTS and OOSTS should not be separate strategies	1	Resident	No change proposed. The strategies were produced separately; however they recognise the opportunities and challenges of the neighbouring locations. Officers involved from the boroughs, TfL and OPDC were largely the same to ensure the strategies were consistent.

OOSTS and PRTS	a combined strategy would more clearly acknowledge that capacity for extra longer-distance road travel across the Park Royal area, merely to get to Old Oak Common, has to be accommodated in the Local Plan, even if it can be discouraged.	1	Resident	No change proposed. OPDC is promoting trips to Old Oak in accordance with the Sustainable Transport Hierarchy. Longer distance trips would be encouraged to be made by public transport.
Public realm strategy	Public realm strategy must include funding of early benefits for local residents, who face nearby construction activity (misery) over many years.	1	Resident	Noted. The IDP references a number of interventions which could be delivered in the shorter term, subject to approvals and funding
North Acton Link tunnel	North Acton link proposes a new, high-level walking and segregated cycling bridge across the whole width of the cutting, with a new booking office above the platforms. The current booking office would be closed, and it must be made clear how current landscaping work between that entrance and Victoria Road to the south can be modified later.	1	Resident	Noted.
Victoria Road	Crossing Victoria Road at some point is still necessary, and needs to be traffic-calmed at that location, possibly with both chicanes and raised cushions	1	Resident	Change proposed. The Victoria Road Development Framework Principles document promotes the need for east-west desire lines crossing Victoria Road. This is detailed in the Old Oak Lane and Old Oak Common Lane place.
Willesden Junction Station Study. Policy 4 Rail	Willesden Junction Station needs to include the public as a ‘stakeholder’ in its production	1	Resident	Noted. The Harlesden Town Centre forum was engaged in the production of the Willesden Junction station study. The study is published alongside the Reg 19 Local Plan for public consultation.

Willesden Junction Station Study. Policy 4 Rail	the study should be widened to include possible vehicle routes on the south side of the station that might relieve constant traffic congestion in Tubbs Road and Nightingale Road, Harlesden. Current pedestrian proposals at junction are too narrow. Walk to Harrow Road needs to be improved.	3	Resident, local authority officer	Change proposed. Improved connections from Harrow Road to Willesden Junction is proposed in the Willesden Junction Place policy and the IDP.
Transport policy 1	Add to preferred policy option: (e) Ensure that policies are aligned with neighbouring authorities so that interventions are designed where possible to also reduce existing congestion in the surrounding road network. (Reason: existing networks are already at their limits; congestion causes low-quality urban life, and inhibits investment.)	1	Resident	Change proposed. Policy T1 addresses the need to ensure OPDC and local highway authorities work together to relieve congestion.
Transport policy 1	Add to preferred policy option: (f) Recognise that road traffic congestion levels, even with strict car-parking standards, must be allowed to influence the target of OPDC housing and job creation numbers. (Reason: creating arbitrary targets is unacceptable if it results in practice in sharply worsening daily living conditions.)	1	Resident	No change proposed. OPDC promotes a shift in travel behaviour and reduced dependency on use of the private car through improved walking and cycling environments and good public transport provision, as set out in Policy SP7. Modelling as part of the Old Oak Strategic Transport Modelling Study and Park Royal Transport Strategy has informed required interventions identified in the Local Plan.

Figure 102	Comments on Figure 102: Street and route hierarchy (page 253): The meaning of the map veers between ‘roads’ and ‘routes’ and it should be clarified as showing one or the other. It is not tenable to mix them, and is very confusing, including when trying to amend the map. Primary routes: Wood Lane and Scrubs Lane (A219) should be shown as a primary route. The Harrow Road and Harlesden High Street (A404) from the North Circular Road to Scrubs Lane should be shown as a primary route. Apart from Western Avenue (A40) and North Circular Road, no other road or route should be ‘primary’. The route from Old Oak High Street to Harlesden High Street should be an ex-primary route (for want of a better name) just as much as the one to Station Approach. Old Oak High Street should mainly be for walking and segregated cycling, with possible traffic-calmed crossovers for road traffic. The ex-primary route south of the HS2 station should be removed. The east-west ex-primary route called Grand Union Street should not be a through vehicular route running past	1	Resident	Change proposed. The walking and cycling maps have been updated

	the HS2 station entrance, and the two halves of that road should be given separate names. The ex-primary route under Old Oak Common Lane station and westwards across the Quattro and Sword sites to Chase Road should not be a through vehicular route (all A40 traffic to Old Oak Common should be encouraged to use Wood Lane and Scrubs Lane, even from the west, and not Gypsy Corner or Savoy Circus). The Gypsy Corner one way system could have a designated lay-by to drop off HS2 station passengers, who would be encouraged to walk the rest of the way. Secondary routes: The recommended junction on the North Circular Road for Old Oak Common should be the Abbey Road underpass. The current route from there, however, is not straightforward. For that reason, the tertiary route of Premier Park Road and Waxlow Road should be upgraded to a secondary route. (A new tertiary route off that should run across a new bridge over the Grand Union Canal to McNichol Drive.) The Abbey Road - Premier Park Road junction should be remodelled so it becomes the main through route,			

	with ‘Abbey Road south’ being the side road. A new secondary route should start from a Waxlow Road / Acton Lane crossroads, through Willesden substation land and across the canal to join Volt Avenue, all of which would become a secondary route as well. North Acton Road north of Minerva Road would be relegated to an ungraded route, with interventions to greatly discourage through-traffic. North Acton Road from Volt Avenue to Minerva Road would be downgraded to a tertiary route. Atlas Road and the OPDC-proposed ‘Triangle estate bypass’ would become secondary routes and designated the A4000. The existing Old Oak Lane through the Triangle estate would be relegated to an ungraded route, with interventions to discourage or completely ban through-traffic (except buses – in fact, this non-congested bus route would remove the need to build an Old Oak High Street bridge over the West Coast Main Line to cater for buses). Tertiary routes: The tertiary route along the north side of Wormwood Scrubs should be removed. The Rainsford Road, Whitby Avenue and Twyford Abbey Road one-way-			

	system should be shown as a tertiary route, from the western end of Cumberland Road. The routes at the western end of Coronation Road should be drawn more clearly, including showing the A40 reversing road further east. South of the A40, Alliance Road and Kendal Avenue should be shown as tertiary routes, including over the Central Line.			

Figure 105	It is unclear what the exact definition is of lines on the walking and cycling maps (pages 257 and 261) and why the maps should be quite so dissimilar.	1	Resident	Change proposed. The walking and cycling maps have been updated
Ch. 13; Prioritising Infrastructure; pg. 346; table 16	Support for Willesden Junction station upgrade being delivered during the early phases of infrastructure delivery. More detailed timeline needed to back this up.	3	LB Brent	Noted. Details are included in OPDC's IDP
Ch.11; T4, a) vii.; pg. 264	Expression of support for Crossrail-WCML link.	3	LB Brent, Hammersmith Society	Noted.
Ch. 11; T4, a) iii.; pg. 264	'Wider' station upgrade is needed at Willesden Junction not just capacity.	1	LB Brent	Noted. These requirements have been embedded into the Willesden Junction place policy
Ch. 11; T1, pg. 264	LP should promote public transport connections, on both existing and planned infrastructure.	1	LB Brent	Noted. Local Plan does promote transport connections on both existing and planned infrastructure.
Ch. 11; T4, c), pg. 264	Proposal to use the currently underutilised Northolt-Acton Line to provide regular, direct services from Oxfordshire/Buckinghamshire commuters to Old Oak. This could involve a new station in the Park Royal area, possibly allowing interchange with the Piccadilly Line or at North Acton.	5	Chiltern Railways	Noted. OPDC responded to the Network Rail consultation on this and requested further discussions to investigate this proposal further.
Ch. 11; T4, c), pg. 264	Need to protect the Northholt-Acton Line from any changes that would preclude a future Chiltern service and include this future service/infrastructure in the LP.	1	Chiltern Railways	Noted. OPDC responded to the Network Rail consultation on this and requested further discussions to investigate this proposal further.

Ch. 4; P1, l); pg. 56	Railway infrastructure (depots, stations, stabling) must be able, from the outset, to accommodate over-site development.	1	Farrells	Noted. Where feasible, OPDC's local plan supports over-site development.
Ch. 11; T4, 11.32; pg. 266	All new rail stations should have step-free/level access to all platforms. This is not currently in the Rail policy.	1	GLA	Noted. T5 rail highlights how all new stations will be designed to enable seamless connectivity into the surrounding areas including step-free access.
Ch. 11; T4, a), I; pg. 264	Old Oak Common Station should include adequate blue-badge parking provision.	1	GLA	Noted. OPDC agrees that blue badge parking provision should be provided at Old Oak Common Station. It is however DfT's responsibility to provide this and as such OPDC will seek to influence DfT to ensure blue badge parking is provided, in line with T4 parking policy which seeks to secure blue badge provision in Old Oak and Park Royal.
Ch. 11; T4, a), I; pg. 264	Old Oak Common Station should include a 'Changing Places' facility (a large/adapted room for a disabled person to change).	1	GLA	Noted.
Ch. 11; T4, 'Key Issues' - 6; pg. 264	Wording Change. T4, 'Key Issue 6' needs to say that it includes proposed OPDC development.	1	GLA	Noted.
Ch. 11; T4	The LP should specifically recognise the need for additional service capacity on the N/WLL Lines.	1	GLA	Change proposed, added to supporting text
Ch. 11; T4, a, iii; pg. 264	LP should refer to capacity/access improvements needed to meet demand at existing stations	1	GLA	Noted. T5 highlights the requirement to improve capacity at Willesden Junction and North Acton and the broader policy notes the requirement to provide step free access from all entrances to platform to ensure any routes to, from or through the station is accessible to all.

Ch. 11; T4, b; pg. 264	LP should state that construction works should avoid adversely impacting on existing rail infrastructure	2	GLA, TfL	Noted. T5 specifies that any developments taking place near railway stations should not impact on TfL or Network Rail's ability to operate train services. More broadly, T8 highlights the need to provide measures to reduce the impact on construction trips and the need to co-ordinate and phase construction projects to enable the transport impacts, such as disruption to existing rail infrastructure, to be effectively mitigated.
Ch. 11; T4	LP should mention any required mitigation for rail network impacts	2	GLA, TfL	Noted. T8 highlights the requirement to minimise construction impacts on infrastructure such as transport. OPDC will seek to ensure that any impact on the rail network is mitigated
Ch.11; T8	LP should acknowledge the role of rail freight in the area and policies should seek to facilitate it (including during construction)	2	GLA, TfL	Noted. T7 acknowledges the role of rail in delivering goods in a sustainable and efficient way
Ch. 11; T4, para 11.29, pg. 266	Wording to be updated with progress from Crossrail-WCML Link business case.	2	GLA, TfL	No change proposed. OPDC still promotes the aspiration to deliver the Crossrail to WCML link.
Ch. 11; T4; para. 11.30, pg 266	Wording should stress that HS2 station ped/vehicle links are early stage and indicative	1	GLA	Change proposed. Figures have, where relevant, been identified as illustrative or indicative
Ch 11; T4, fig. 113	Diagram incorrect - Central Line should be shown to terminate at Ealing Broadway rather than continuing	2	GLA, TfL	Changed proposed. The new rail map has been updated to reflect this
Ch 11; T4, fig. 113	Diagram incorrect - The West Coast main line routes should be labelled to Harrow and Wealdstone and Watford Junction. Wembley Central actually	2	GLA	Changed proposed. The new rail map has been updated to reflect this

	appears on the map although the lines do not extend to it.			
Ch. 11; T4, e); pg. 264	Support for LB Hounslow 'Golden Mile' rail link, connecting Hounslow and Brentford to Old Oak	3	GSK, LB H&F, LB Hounslow	Noted
Ch. 11; T4, e); pg. 264	Golden Mile rail link should terminate at OOC HS2/Crossrail station. LP should make provision for the new spur off the NLL that this could require.	1	GSK	No change proposed. Currently there is no information to indicate where this spur should be located.
Ch. 11; T4, a, iii; pg. 264	North Acton station needs upgrading now, rather than in future.	1	GUA	Noted. T4 acknowledges that North Acton station requires upgrades to increase capacity and enhance the passenger experience.
Ch.11; T4 or 'Working with Stakeholders', para. 13.27, pg. 346	Need for continuing dialogue to consider diverse suggestions as schemes are progressed.	1	GUA	Noted. OPDC will continue to work with both the public and strategic partners as schemes progress.
Ch. 11; T4, a), i; pg. 264	OOC Station should be recognised primarily as interchange station and not destination/'heart'.	2	GUA	No change proposed. OPDC will continue to identify the station as a destination, as well as an interchange.
Ch. 3; OSP4, a), I; pg 42.	Development around station should be appropriate in terms of scale, form and function.	1	GUA	Noted
Ch. 11; T4	Vehicular access to OOC station is constrained and will not be able cope	1	GUA	No change proposed. OPDC will continue to work with DfT, HS2 and TfL to plan access links to the station.

Ch. 11; T4, v, pg. 264	Connections to/from stations are crucial to their success	1	GUA	Noted. The local plan recognises that connections are crucial to the success of stations.
Ch. 11; T4, 11.32; pg. 266	Provide clear, accessible signage/info in stations and connections	1	GUA	Noted. The supporting text for policy T1 states that managing vehicle movement and speed will also be achieved through good design and signage.
Ch. 11; T4, 11.32; pg. 266	Information/signage should identify where assistance is available to disabled/elderly users.	1	GUA	Noted. T1 and T2 are driven by the Healthy Streets Initiative which recognises the needs of different people should be considered.
Ch. 11; T4	Adverse impacts on nearby properties from new rail schemes or increased frequency/patronage should be remedied	1	GUA	Change proposed. Policy T5 promotes that new rail infrastructure must be sensitively designed to minimise the impact on existing communities.
Ch. 11; T4	Policy for new/busier rail services should safeguard existing 'amenity'	1	GUA	Change proposed. Policy T5 promotes that new rail infrastructure must be sensitively designed to minimise the impact on existing communities and amenity.
Ch. 11; T4	Rail policy should explicitly state need for accessible and inclusive infrastructure	2	Hammersmith and Fulham Disability Forum	Noted. T5 policy states that all rail stations should provide step free access from all entrances to platforms to ensure any route to, from or through the station is accessible to all;
Ch. 11; T4	Accessibility - Mitigation should be provided for long walking distances and/or steep gradients (e.g. visible alternative routes)	1	Hammersmith and Fulham Disability Forum	Noted. Policy T2 highlights the need to provide new and enhanced walking infrastructure across Old Oak and Park Royal that is safe, accessible and inclusive.
Ch. 11; T4	Rail policy should recognise importance of rail connections to Heathrow Airport	1	Heathrow	Noted. OPDC recognises the importance and potential of a rail connection to Heathrow Airport. This is detailed in Strategic Policy 1
Ch. 11; T4	Rail policy should explicitly acknowledge importance of Heathrow Express for providing fast (non-stop), frequent services to Heathrow Airport	1	Heathrow	Noted

Ch.11; T4	Rail policy should set out the importance of the interchange quality for journeys to Heathrow (e.g. between Crossrail, GWML, Hex & HS2 services)	1	Heathrow	Noted. T5 highlights the importance of interchange and providing high quality interchange facilities both for rail and other modes.
Ch.11; T4, a)	Interchange - LP should emphasise the need for high quality, seamless interchange between rail services at OOC Station	2	Heathrow	Noted. T5 highlights the importance of interchange and providing high quality interchange facilities both for rail and other modes.
Ch.11; T4, d) and para. 11.34; pg. 266	The future-proofing for the removal of gatelines should not apply to the HS2 gatelines as they are deemed necessary for revenue protection and security	1	HS2	Change proposed. Future proofing is included, however it is now not specific to gatelines
Ch. 11; T4	Support for potential WCML platforms/stopping services at Willesden Junction (even if WCML-Crossrail Link is delivered)	3	LB H&F	Noted
Ch. 11; T4	Support for rail connection to Brent Cross/Luton via Dudding Hill Line	4	LB H&F	Noted
Ch. 11; T4	Support for Chiltern Line service to High Wycombe	1	LB H&F	Noted
Ch. 11; T4	Proposal of second additional LO station on the WLL at Westway Roundabout on Wood Lane ('Westway Circus Station' proposed by WLLG)	5	Midland Terrace Resident's Group, Old Oak Interim Forum, WLLG	Noted. This is outside the OPDC boundary and should be discussed with TfL
Ch. 11; T4	Currently no integrated planning for HS2 site; decisions taken by different authorities 'in a vacuum'	1	MP for Hammersmith	Noted. The HS2 station is being delivered by DfT and HS2 Ltd through the High Speed Rail (London to West Midland) Act. The Local plan promotes the delivery of the HS2 station. OPDC are working with DfT, HS2 Ltd, TfL and the local boroughs.

Ch. 11; T4	LP should be aware of potential new station on Dudding Hill Line	2	Network Rail	Noted. OPDC are aware of this proposal which is at a very early stage of feasibility.
Ch. 11; T4	Land for future rail infrastructure should be safeguarded in LP so as not to preclude its future development		Network Rail, Hammersmith Society	Noted
Ch. 11; T4	Safeguarding of Crossrail Depot plans	1	Network Rail	Noted. OPDC will work closely with stakeholders, such Department for Transport, High Speed 2, Network Rail, Transport for London and Crossrail to explore the potential for the relocation, reconfiguration and/or development above and around this infrastructure to realise the comprehensive regeneration of Old Oak South.
Ch. 11; T4	Safeguarding of HS2 and GWML station site	1	Network Rail	Noted. OPDC will work closely with stakeholders, such Department for Transport, High Speed 2, Network Rail and Transport for London to develop plans for the HS2 and GWML station site
Ch. 11; T4	Safeguarding for possible additional platform for Wycombe Line services required at HS2/GWML station	1	Network Rail	Noted. OPDC is aware of this proposal which is at a very early stage of feasibility.
Ch. 11; T4	Safeguarding for possible WCML-Crossrail Link	1	Network Rail	Noted. OPDC supports the provision to safeguard the WCML-Crossrail and is working with HS2, DfT and Brent to investigate this
Ch. 11; T4	Safeguarding for site of new Hythe Road LO station	1	Network Rail	Noted. OPDC supports the development of Hythe Road station and will influence TfL to show support of safeguarding and developing the station.
Ch. 11; T4	Safeguarding for site of new Old Oak Common Lane station	1	Network Rail	Noted. OPDC supports the development of Old Oak Common Lane Station and will influence TfL to show support of safeguarding and developing the station.

Ch. 11; T4	Request for LOROL depot to remain as current use	1	Network Rail	Change proposed. The Local Plan supports long term development on this site, if a technical solution can be found involving either the relocation, reconfiguration or relocation.
Ch. 11; T4	Possible site for terminating WLL services?	1	Network Rail	No change proposed. Response is unclear
Ch. 11; T4	Ensure plans remain for Willesden Freight Euro-terminal to be used for HS2 construction (to be returned in 2030s)	1	Network Rail	Noted. The Euroterminal site will be safeguarded and the land around it will be retained as SIL.
Ch. 11; T4	Safeguarding for Crossrail turn-back 'stub'	1	Network Rail	Noted. OPDC supports the safeguarding of the Crossrail stub and potential WCML link and is working with DfT, Crossrail and Brent on this.
Ch. 11; T4	Dudding Hill Line to be retained as running line	1	Network Rail	Noted.
Ch. 11; T4	Grade separation at Ladbroke Grove (for increased GWML services) may require future land-take	1	Network Rail	Noted. This is outside the OPDC boundary
Transport Supporting Studies	Demand forecast not robust	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL view the evidence base as robust
Transport chapter	Decking over the Crossrail depot and HS2 station box mean that assumptions in Transport for London London Overground studies no longer apply	1	Resident	No change proposed. OPDC will work closely with stakeholders, such Department for Transport, High Speed 2, Network Rail, Transport for London and Crossrail to explore the potential for the relocation, reconfiguration and/or development above and around this infrastructure to realise the comprehensive regeneration of Old Oak South.
North Acton Station Feasibility Study	Critique of specific demand forecast/estimate - North Acton Station Feasibility Study	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL view the evidence base as robust

Old Oak Strategic Transport Study	Critique of specific demand forecast/estimate - Willesden Junction Station	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL view the evidence base as robust
North Acton Station Feasibility Study	North Acton Station Feasibility Study - critique of design approach/methodology	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL view the evidence base as robust
Park Royal Transport Study	Long walk distances to stations within area/ poor permeability to Park Royal station	1	Old Oak Park (DP9)	Noted. T2 policies highlight the need to provide new and enhanced walking infrastructure across Old Oak and Park Royal that is safe, accessible and inclusive. It also seeks to improve legibility across Old Oak and Park Royal by contributing to the network of Legible London Wayfinding signage.
Park Royal Transport Study	Critique of specific demand forecast/estimate - Park Royal Transport Study	1	Old Oak Park (DP9)	No change proposed. OPDC and TfL view the evidence base as robust
Ch.11; T4, a),vii; pg. 264	WCML-Crossrail Link should not be included in LP	1	Osbourne Investments Ltd (Boden House) (Savills)	No change proposed. WCML-Crossrail link is a provisional rail link that OPDC supports in principle due to its potential to enhance connections with other areas such as Wembley.
Ch.11; T4	LP should make reference to Kensal Canalside Crossrail station	1	RB K&C	Change proposed. The Local Plan references the Kensal Canalside opportunity area in SP7, T1, P1 and P10
Ch.11; T4	LP should explicitly mention the need for capacity growth on N/WLL from OPDC development	2	TfL	Noted. Wording has been included stating that capacity enhancements on the North and West London lines have been identified.
Ch.11; T4	Wording needs to be clearer	1	TfL	Change proposed.
Ch.11; T4	Wording should be stronger	1	TfL	Change proposed.
Ch. 11; T4, a), I; pg. 264	OOC Station should have international quality architecture/design	1	Hammersmith Society	Change Proposed. T5 specifies that design, layout and landscaping of the station should be world class. This is also indicated in Old Oak South Place policy

Ch. 11; T4, a), I; pg. 264	Incompatibility of OOC Station being both interchange and destination	1	Hammersmith Society	Noted
Ch.11; T4	Acknowledge the changes to wider rail services are needed to facilitate those within the area	1	TfL	Noted.
Ch. 11; T4, a), ii	Support for new LO station at Hythe Road	1	Hammersmith Society	Noted. OPDC acknowledges the support.
Ch. 11; T4, a), ii	Support for new LO station at Old Oak Common Lane	1	Hammersmith Society	Noted. OPDC acknowledges the support.
	Reject West London Line Group proposal that involves construction over Wormwood Scrubs	1	Hammersmith Society	No change proposed. OPDC are not proposing any construction over Wormwood Scrubs.
Ch. 11; T4	Use of railway should be maximised during construction to carry material	1	Hammersmith Society	Noted. T7 acknowledges that the need to use more efficient and sustainable ways of delivering goods such as using the railway. T8 also acknowledges the need to maximise the use of rail in the delivery of construction materials.
Ch. 4; P1; l); pg. 56	Lack of clarity of implications of relocating Crossrail depot, particularly on cost and infrastructure 'funding gap'	2	Hammersmith Society	Noted. This is included in Old Oak South policy. OPDC will work closely with stakeholders, such Department for Transport, High Speed 2, Network Rail, Transport for London and Crossrail to explore the potential for the relocation, reconfiguration and/or development above and around this infrastructure to realise the comprehensive regeneration of Old Oak South.

Ch. 4; P1; l); pg. 56	Uncertainty around decking over rail assets needs clarification	1	Hammersmith Society	Noted. This is included in Old Oak South policy. OPDC will work closely with stakeholders, such Department for Transport, High Speed 2, Network Rail, Transport for London and Crossrail to explore the potential for the relocation, reconfiguration and/or development above and around this infrastructure to realise the comprehensive regeneration of Old Oak South. Details are also included in the Delivery and Implementation chapter.
Ch. 11	Little consideration given to local transportation within the site	1	Hammersmith Society	Noted. OPDC recognises the importance of improving the existing local transportation network particularly with new and improved walking and cycling routes within the area. The proposed bus route will also seek to improve the local transport network.
Ch. 12; EU2 and Ch. 11; T6, e)	LP should consider ambitious local driverless transportation	1	Hammersmith Society	No change proposed. Policy EU11 recognises the potential for smart technology to revolutionise transport in the future, but the local plan's policies need to be suitable for assessing development proposals in the short term. The Local Plan will be monitored through key performance indicators and as new technology comes on line, the Local plan can be updated accordingly.
Ch. 12; EU2 and Ch. 11; T6, e)	Driverless systems should be accessible to potential users and preferably free of charge	1	Hammersmith Society	No change proposed. Policy EU11 recognises the potential for smart technology to revolutionise transport in the future, but the local plan's policies need to be suitable for assessing development proposals in the short term. The Local Plan will be monitored through key performance indicators and as new technology comes on line, the Local plan can be updated accordingly.

Ch. 12; EU2 and Ch. 11; T6, e)	Driverless system should be considered before design for sites (e.g. Car Giant) is fixed	1	Hammersmith Society	No change proposed. Policy EU11 recognises the potential for smart technology to revolutionise transport in the future, but the local plan's policies need to be suitable for assessing development proposals in the short term. The Local Plan will be monitored through key performance indicators and as new technology comes on line, the Local plan can be updated accordingly.
Ch. 11	LP presumes reliance on car use instead of walking/cycling	1	Hammersmith Society	No change proposed. The Local Plan promotes the prioritisation of pedestrian and cyclists over car users in SP7
Ch. 11; T1/2	Oppose introducing pedestrian flow south from OOC station directly to Wormwood Scrubs	2	Hammersmith Society	No change proposed. The Wormwood Scrubs Act (1879) requires that Wormwood Scrubs should provide for the enjoyment of inhabitants of the metropolis. Providing accesses accords with this. The park is also identified as a Metropolitan Open Land in the London Plan and providing access to it accords with this designation. The Local Plan requires (Policy P12) that any proposals for the Scrubs are sensitive to it and are agreed by the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham.
	Diagrams - should include scale indicator	1	Hammersmith Society	Noted. This will be considered in revised maps, where appropriate.
Ch 11; T3, a)	Support for segregation of heavily used cycling flows	1	Hammersmith Society	Noted. T3 highlights the requirement to provide a safe, attractive and inclusive cycle network and OPDC will consider cycling segregation if deemed best solution to achieve this policy.

Ch 11; T3, a)	Cyclist segregation should be achieved by raised kerbs/level changes	1	Hammersmith Society	Noted. T3 states that both cycle superhighway and Quietways programmes will be considered to b) deliver a comprehensive, safe, attractive and inclusive cycle network.
Ch. 11; T3	Concerns about conflicts between cyclists and pedestrians on canal towpath	1	Hammersmith Society	Noted. OPDC will work with the Canal and River Trust to understand the possibilities for cyclists using the canal towpath. OPDC will also investigate alternative east-west cycle routes.
Ch. 11; T3	Proposal for cycle path alongside Chiltern Line	1	Hammersmith Society	Noted. A route alongside the Chiltern line is identified within the Public Realm, Walking and Cycling Strategy.
Ch. 11; T3, fig. 110	Cycle route from south east to continue along Piccadilly Line	1	Hammersmith Society	Noted. This is mainly outside of the OPDC area.
Ch. 11; T4	Plans should be able to accommodate OOC as temporary terminus for HS2	1	Hammersmith Society	Noted. OPDC is keeping up-to-date with this discussion and will investigate the implications of the station becoming a temporary terminus
Ch. 11; T4, c), pg. 264	Passive provision for link to Southampton/south-west	1	Hammersmith Society	No change proposed. It is unclear how this could be provided other than through the National Rail platforms at the Old Oak Common station, which are already part of proposals for the station.
Ch. 11; T4, c), pg. 264	Passive provision for connection to HS1	1	Hammersmith Society	No change proposed. This proposal has been dropped by DfT and HS2 because of the poor business case
Ch.11; T4, para. 11.33	TfL/OPDC to consider WLLG's list of service proposals for strategic rail study	1	West London Line Group	No change proposed. The strategic rail study is being progressed post the production of the Local Plan
Ch. 11; T4	Passive provision for WLLG proposals need to be made at this stage in the LP	1	West London Line Group	No change proposed. Passive provision cannot be made at this stage in the Local Plan because the locations are unknown. Proposals would need to be agreed with TfL, DfT and HS2 Ltd before any safeguarding.

Ch. 11; T4 & Old Oak Strategic Transport Study	Inadequate reference to East Croydon - Milton Keynes service. LP should maximise potential of this service within the site.	3	West London Line Group	No change proposed. The proposals and impact on Old Oak and Park Royal are not clear.
Ch.11; T4, para. 11.35	Alternative Policy Option for Rail does not consider those proposed by WLLG (e.g. WLL platforms in OOC/HS2 station)	1	West London Line Group	No change proposed. The WLL Platforms at the OOC station were investigated by HS2 and TfL and found to be infeasible.
Ch. 11; T4, a), I & ii	Interchange between OOC and Hythe Road is not suitable	2	West London Line Group	Noted. OPDC is working with TfL, DfT and HS2 to ensure the design of Hythe Road enables seamless interchange to OOC.
Ch.11; T4, para. 11.31	Public realm improvements in Park Royal area not sufficient to increase rail mode share	1	West London Line Group	Noted. T1, T2 and T3 advocate improving cycling and walking within Old Oak and Park Royal and this will improve accessibility to stations and therefore encourage a mode shift in accordance with the sustainable transport hierarchy (SP7).
Ch. 11; T4	Proposal for new LU station at junction of Central and Piccadilly Lines	2	West Twyford Residents' Association	No change proposed. OPDC is not aware that this proposal has been investigated by TfL.
Ch. 4; P4	Lack of amenity space at North Acton if TfL land is developed	1	Resident	Noted. Policies SP8 and EU1 sets out OPDC's requirements in relation to public open space provision
Transport chapter	Need for transparency as rail schemes are (re)considered	1	Resident	Noted.
Transport chapter	Wormwood Scrubs must be protected from rail infrastructure	2	Hammersmith Society	Noted. Wormwood Scrubs is an important green space that OPDC seeks to protect from any development. Details are included in Policy P12.
Old Oak Strategic Transport Study	London Overground' studies must be reconsidered	1	Resident	Noted. The Local Plan requires (Policy P12) that any proposals for the Scrubs are sensitive to it and are agreed by the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham.

Ch. 11; T4, fig. 113; pg. 265	Diagram incorrect - fails to show rail freight chords and unused platforms at Acton Main Line	1	Resident	Change proposed. The rail map has been updated
Old Oak Strategic Transport Study	Study should consider a Crossrail station in Park Royal (possibly on WCML-Crossrail Link or Wycombe Line)	1	Resident	No change proposed. OPDC is open to new rail links, however, at this stage a Crossrail link at Park Royal is not being considered. Any proposal would also need to be agreed with Crossrail and TfL.
Ch. 11; T4 & Old Oak Strategic Transport Study	Study/LP should consider passive provision for additional platforms at OOCL Station	1	Resident	No change proposed. The design of OOCL station is being investigated by TfL through the GRIP 3 study
Ch. 11; T4 & Old Oak Strategic Transport Study	Study /LP should consider whether Acton Wells Bridge over GWML should/can be widened	1	Resident	No change proposed. It is unclear which bridge is being referred to. All infrastructure is listed in the IDP.
Ch. 11; T4 & Old Oak Strategic Transport Study	Study/LP should consider an alternative to OOCL entrance onto Midland Terrace	1	Resident	No change proposed. The design of OOCL station, including a possible entrance to Midland Terrace, is being investigated by TfL through the GRIP 3 study and further business case work.
Ch.11; T4	Wording Change. 'Mainline' to 'Main Line'	1	Resident	Change proposed. Local plan has been updated to reflect this.
Old Oak Strategic Transport Study	Call for separate 'independent' supporting transport paper to address list of issues (see master ref 2869)	1	Resident	Noted. OPDC and TfL view the evidence base as robust.
Ch. 11; T4	LP needs to consider intensification of services on GWML and its implications on the area (e.g. use of HEX paths after service expires or continued use of North Pole Depot)	1	Resident	Noted. HS2 and DfT's transport modelling for the Old Oak Common station has considered this.

Ch. 11; T4, a), iii	Stations that serve Kensal (Kensal Rise and Kensal Green) should be considered for improvements as part of OPDC plans	1	Resident	No change proposed. Kensal Rise and Kensal Green fall out of the OPDC area, are unlikely to give rise to a need for improvement as a result of development in the OPDC area and therefore cannot be considered as part of the OPDC local plan. OPDC will of course seek to influence improvements to these stations where possible.
Ch. 11; T4	General opposition to HS2	1	Resident	Noted.
Ch. 11; T4	Underground walkways for interchange between stations	1	Resident	Noted. OPDC wants access and interchange to be seamless. If underground walkways are viable and help achieve this policy aim, they will be considered.
Ch. 11; T4	Underground interchange passages could incorporate retail or other amenity/high quality public realm	1	Resident	Noted. OPDC, within the design and place chapters, expect that design across all parts of Old Oak and Park Royal is of a high standard.
Ch. 11; T4	Concern about nuisance to nearby residents from increased utilisation of Dudding Hill Line	2	Resident	Noted. The increased use of the Dudding Hill Line is at a very early investigation stage.
Ch. 11; T4	Uncertainty of operational feasibility of increased utilisation of Dudding Hill Line	1	Resident	Noted. The increased use of the Dudding Hill Line is at a very early investigation stage.
Ch. 11; T4	Central Line should be connected to OOC station	2	Residents	Noted. Whilst no direct link will be provided, OPDC seeks to provide seamless interchange and connectivity between different stations. T2 supports the delivery of a high quality pedestrian walking environment for routes to and through new and existing stations.
Ch. 11; T4	Support for Crossrail stop at OOC	7	Residents	Noted.

Ch. 11; T4,	Location of station entrances must be suitable, so that long walks to key attractors are avoided	1	Resident	Noted. T5 seeks to provide step free access from all entrances to platforms to ensure any route to, from or through the station is accessible to all. It also states that all station entrances have a positive street presence and in so doing ensuring entrances are located in suitable and accessible locations
Ch. 11; T4,	Relocation or expansion of Park Royal Station	2	Residents	No change proposed. OPDC will seek to influence TfL in upgrading and improving the station.
Ch. 11; T4	Use available capacity of existing platforms at Acton Main Line (suggestion of terminating Stratford LO services there)	1	Resident	No change proposed. This is outside the OPDC area
Ch. 11; T4	Introduce Crossrail services at OOC sooner than HS2 arrival in 2026	1	Resident	No change proposed. It is not feasible to open the Crossrail station in advance of the HS2 station as the site is required for construction purposes and safe egress could not be secured.
Ch. 11; T4 & T3	Promote taking cycles on LO trains	1	Resident	Noted. OPDC supports the use of active modes and would encourage taking bicycles on London Overground trains supporting onwards active travel.
Ch. 11; T4	Improve pedestrian access from Harrow Road to Willesden Junction Station (as well as SFA)	3	Residents	Change proposed. This is included within the Willesden Junction place (P11).
Ch. 11; T4	Timetabling of trains should be worked around interchanging services	2	Residents	Noted. HS2 Ltd, Network Rail and TfL will be responsible for timetabling.
Ch. 11; T4	Transport infrastructure takes away land (and funding) which could be used for housing	1	Resident	No change proposed. The transport infrastructure being considered is seen as essential to support the delivery of homes and jobs in Old Oak and Park Royal
Ch. 11; T4	Crossrail station on Scrubs Lane	1	Resident	No changed proposed. This would not be feasible so close to the Old Oak Common station

Ch. 11; T4, a), iii	Longer NLL platforms at Willesden Junction	1	Resident	No change proposed.
Ch. 11; T1	Public transport connectivity to/within Harlesden needs more consideration in Local Plan	2	Residents	Change proposed. Further details are included in the place policy for Willesden junction (P11). This includes connecting Old Oak High Street into Harrow Road.
Ch.11; T1	Connections between rail nodes are essential; consider PRT systems or high frequency bus services	4	Residents	Noted. T5 seeks to ease connections between rail nodes by managing interchange requirements with competing modes and by ensuring any route to, from or through the station is accessible to all.
Ch. 11; T6, b) & para. 11.50	Consider flyover at Savoy Circus to ease road congestion	1	Resident	No change proposed. This lies outside of the boundary of OPDC and this local plan will have limited ability to influence this.
Ch. 11; T5	Next iteration of LP should show indicative bus routes	3	LB Brent, Hammersmith Society, Old Oak Park (DP9)	Change proposed. The Local plan shows roads which may form part of the future bus network. The routings which may run along the roads has not yet been agreed by TfL Buses.
Ch. 11; T5	Early introduction of required road infrastructure to enable bus services to serve developments is supported	1	Diocese of London	Noted. OPDC recognise the early deliver of road infrastructure.
Ch. 11; T5	LP Bus policy should include additional requirement for temporary provision for buses prior to permanent arrangements during the phased development of the area	1	TfL	Changed proposed. T6 states that OPDC will provide temporary provision for buses, during the phased development of the OPDC area.
Ch. 11; T5, d)	Support for low emission/'green' bus fleet	2	Diocese of London, LB H&F	Noted. OPDC recognise the support for low emission buses.
Ch. 11; T5, c)	Avoid bus stop bypasses as they make access difficult for disabled people	1	GLA	Noted.

Ch. 11; T5	LP should include commitment to mitigating adverse impacts on bus network during build-out phase, including any temporary infrastructure/routes required	1	GLA, TfL	Changed proposed. T6 states that OPDC will provide temporary provision for buses, during the phased development of the OPDC area and ensuring that impacts to bus operations resulting from construction activity are mitigated
Ch. 11; T5, para. 11.42	Bus policy should reinforce the justification of why bus priority measures are important and necessary	1	GLA	Noted. T6 highlights the importance of bus priority and other measures in improving bus reliability, capacity and connectivity along with unlocking sites and moving thousands of passengers each day.
Ch. 11; T5	LP should make reference to the possibility for coach facilities, especially for the possibility of interchange at Old Oak	1	GLA, TfL	Noted. T4 acknowledges the importance of providing coach facilities and their potential to provide connections with the wider area of north and west London.
Ch. 11; T5	Effective bus services relies on studying area beyond OO & PR in conjunction with boroughs, e.g. in order to consider wider bus priority	1	GUA	Noted. OPDC will work with TfL on improvements to the wider bus network.
Ch. 11; T5	The planning of the bus network in the area needs to involve the community	1	GUA	Noted. Any proposed bus routes by TfL go through consultation and this provides an opportunity for the local community to get involved.
Ch. 11; T5	Bus strategy needs to consider how local amenities/social infrastructure will be served e.g. schools, medical, shops etc.	1	GUA	Noted. OPDC is working with TfL and this has been a key consideration in the development of the bus strategy.
Ch. 11; T5, c)	Bus stops should be fit for all users	2	GUA, GLA	Noted. T6 highlights how OPDC will ensure all residents in Old Oak and Park Royal live within 400m of high quality, convenient, safe, sheltered and personally secure passenger waiting and information countdown facilities

Ch. 11; T5	Recognition that bus services are one of the most accessible modes and policy for area should reflect this	1	Hammersmith and Fulham Disability Forum	Noted. OPDC recognises the importance of buses in being one of the most accessible modes and T6 highlights how OPDC seeks to ensure all residents in Old Oak and Park Royal live within 400m of high quality, convenient, safe, sheltered and personally secure passenger waiting and information countdown facilities
Ch. 11; T5	Support for bus route connecting Harlesden Town Centre to new High Street	1	Harlesden Neighbourhood Forum	Noted.
Ch. 11; T5 & T6	Road designs needs to consider adequate space for bus operations and follow best-practice	1	LB H&F	Noted. T6 emphasises the importance of bus operations and highlights how all new roads to be used by buses must allow appropriate highway clearance for the largest double deck vehicles and be built to an adoptable standard with sufficient widths.
Old Oak Strategic Transport Study	Critique of plans for two trafficked crossings of the canal on the basis of bus-only use of one crossing and in our view the occupants of the site would be best served by a single east-west bus corridor where service frequency is concentrated		Old Oak Park (DP9)	No change proposed. OPDC's approach is supported by the Public Realm, Walking and Cycling Strategy.
Old Oak Strategic Transport Study	Suggestion that the proposed bridge across the WCML should be designed to enable bus movements is, in our view, unsubstantiated by the STS itself which does not consider this	1	Old Oak Park (DP9)	No change proposed. The bus strategy and Public Realm, Walking and Cycling Strategy further investigates this and recommends the bridge over the WCML is served by buses due to the important benefit to bus connectivity.
Park Royal Transport Study & Ch. 11, T5	Bus thinking dominated by orbital routes and eastern side - provision for western areas (Park Royal) need to be thought about more fully	1	Old Oak Park (DP9)	Noted. OPDC's Local Plan is supported by a Bus Strategy, identifying indicative roads that may form part of a future bus network across Old Oak and Park Royal. It should be noted

				that Park Royal is already well served by buses.
Old Oak Strategic Transport Study, section 8.4.4 & Ch. 11, T5	If infrastructure for bus routes is to be planned now, then routes and volumes need to be known as well	1	Old Oak Park (DP9)	Noted. OPDC is working with TfL to develop proposals for the future bus network which includes bus routes and volumes.
Transport chapter	Critique of specific demand forecast/estimate - Bus assumptions (refer to master ref 2164, 2158)		Old Oak Park (DP9)	No change proposed. OPDC and TfL view the evidence base as robust
Transport chapter	Better solution needed for real-time bus info - current apps do not work well	1	Resident	No changed proposed. OPDC is not responsible for the real-time apps.
Ch.11; T5	Bus routes will need to change as land-use changes - e.g. industrial to residential	1	Resident	Noted OPDC will work with TfL to continually assess and develop the bus network across Old Oak and Park Royal as the area develops
Ch.11; T5	Bus service effectiveness reduced by traffic - need to address this	2	Resident	Noted. T6 seeks to introduce bus priority measures to ensure impact on the service as a result of traffic is minimised. It also highlights how OPDC will provide temporary provision for buses, during the phased development of the OPDC area and ensuring that impacts to bus operations resulting from construction activity are mitigated
Ch.11; T5	Support for bus route connecting to White City (via White City Estate)	2		Noted.
Ch.11; T5	Location of bus stops should be clarified	1		No change proposed. The exact location of bus stops cannot be specified at this stage until bus routes are firmed up by TfL.

Ch.11; T5	Bus routes should focus on very local journeys, within area (perhaps circular routes)	2		No change proposed. Connections beyond the OPDC area are equally important to the bus network serving the OPDC area.
Ch.11; T5	Local bus routes should operate at all times of day	1		Noted. This would be a consideration for TfL.
Ch.11; T5	Road designs should be able to facilitate trams in the future	1		Noted. Trams are not being considered by OPDC but the road width should be able to accommodate trams in the future if this was proven to be desirable.
Ch.11; T5	The OPDC should predict likely timescales for the introduction of fully automatic buses.	1		No change proposed. OPDC does not have accurate information to provide a robust forecast on this. However, OPDC's smart technology policy (EU11) requires development proposals to ensure that any smart city technologies and approaches can be updated over time to respond to innovation
Ch.11; T5	Hail and Ride' should be considered for very local journeys	1		No change proposed. OPDC and TfL are not considering hail and ride schemes at this moment
Ch.11; T5	LP/supporting studies does not recognise lack of bus connectivity to Kensal Canalside and Ladbroke Grove	1	RB K&C	Change proposed. The Local Plan is supported by an indicative bus routes network map which highlights potential connections to Kensal Canalside.
Ch.11; T5	Introduce bus stops on both sides of Harrow Rd. Willesden Junction Station exit	1		Noted. The exact location of bus stops is too detailed for this Local Plan, but routes both sides of Willesden Junction station are identified as being appropriate for buses. The policy promotes good interchange between Willesden Junction station and buses.

Ch. 11; T8/T9	Movement of material by canal and rail must be central to the construction logistics policy (to accord with NPPF policies on sustainability)	1	GUA	Noted. T8 highlights the importance of maximising the use of rail and water transport for construction deliveries to take pressure of roads. It also states that it will aim to co-ordinate and phase construction projects to enable the transport and environmental impacts to be effectively mitigated. The construction and logistics strategy will further investigate the possibility of using the canal and rail to transport construction material.
Ch. 11; T9, a), ii	Costs and benefits of Construction Consolidation Centre need to be tested in Construction and Logistics Strategy	2	GLA, TfL	Noted. The construction and logistics strategy will consider this and as T7 highlights there are currently two consolidation centres in West London and additional consolidation centres are being proposed.
Ch. 11; T9, b	LP should include plan of action for maximising use of canal during all construction phases of all major schemes to take pressure of roads (e.g. HS2, Crossrail, planning apps)	5	GUA	Noted. T8 highlights the importance of maximising the use of rail and water transport for construction deliveries to take pressure off roads. It also states that it will aim to co-ordinate and phase construction projects to enable the transport and environmental impacts to be effectively mitigated. The construction and logistics strategy which OPDC and TfL are commissioning will further investigate the possibility of using the canal to transport construction material. The recommendations from this study will be incorporated into appropriate planning guidance.
Ch. 11; T9, b	LP should state commitment to making positive relationships with canal freight companies and other relevant public bodies	1	GUA	Noted. OPDC will continue to work with public bodies and strategic partners as schemes progress.

Ch. 11; T9	Construction Policy T9 only deals with transport aspects of construction; should also deal with other aspects such as sustainable construction and materials	1	LB H&F	Change proposed. Environment and Utilities policy EU6, EU87 and EU8 deal in detail with construction waste. T8 highlights how OPDC will aim to maximise re-use and recycling of waste and construction materials within the area will reduce transport demands and how with the amount of construction activity planned for the area provides an opportunity for sustainable construction traffic and transport solutions to be adopted.
Ch. 11; T8/T9	General support for using rail for freight and construction		LB H&F	Noted. OPDC support this too.
Ch. 11; T9	LP should commit to moving 100% of material by rail during construction	1	West London Line Group	No Change Proposed. T7 and T8 promote the use of rail in moving materials during construction. To promote sustainable construction OPDC is also promoting transport of materials on the water via the canal. Due to the volume of construction activity, cost, rail path availability and other factors, it will not be possible to commit to moving 100% of construction by rail.
Ch. 11; T9	Site/facility for rail transport of construction materials should be built before any works start	1	West London Line Group	No change proposed. It is inappropriate and inflexible and not in accordance with the NPPF presumption in favour of sustainable development to set this requirement. T7 and T8 promote the use of rail in moving materials during construction. To promote sustainable construction OPDC is also promoting transport of materials on the water via the canal.
Ch. 11; T9	The community must be involved with the preparation of the Construction and Logistics Strategy	1	GUA	Noted. For major schemes, applicants (see policy T8) will be required to submit preliminary Construction Logistic Plans and Construction Method Statements which are subject to public consultation.

Ch. 11; T9	A developer's Construction and Logistics Plan/Construction Code should make mitigation/prevention measures that extend beyond to the vicinity of their site	1	GUA	Noted. T8 notes that measures are required to reduce the impact of demolition, excavation and construction works and must be outlined in a Construction Management Plan, including plans to minimise impacts on surrounding land uses.
Ch. 11; T9	Construction policies and strategies should include management of phasing to avoid one area not affected over prolonged time/intensity	1	GUA	Noted. T8 identifies the need for coordination and phasing of construction projects. This will be further explored through the construction and logistics strategy
Ch. 11; T9	Developments should follow Considerate Contractor Schemes; these should include good communication with the community to help minimise inconvenience	1	GUA	Change proposed. T8 notes that all developers will also be expected to sign up to the Considerate Constructors Scheme and ensure operators of all construction vehicles have attained silver FORS accreditation
Ch. 11; T9	Proposal that a suitable facility for moving construction material be built in the north of the site and with access to the West Coast Main Line.	1	West London Line Group	Noted. Use of existing and proposed consolidation centres outside of the OPDC boundary will be promoted to reduce construction and freight related road trips. T7 promotes the investigation of rail to transport construction material. This will be further explored as part of the construction and logistics strategy.
Ch. 11; T9	Temporary surfaces laid on for construction work in public realm must be of highest quality and safety	1	West London Line Group	Noted. OPDC agrees that impact of construction on public realm should be minimised and temporary surfaces are of the highest quality. T8 states how measures are required from developers to reduce the impact of demolition, excavation and construction works must be outlined in a Construction Management Plan, including plans to minimise impacts on surrounding land uses such as public realm.

Ch. 11; T9	Construction sites must be well managed so that public realm at entrances/in vicinity is preserved in good and safe condition for pedestrians and cyclists.	1	West London Line Group	Noted. Details on the considerations for applications for construction and waste sites are set out in policy T8 and EU6. Construction Management Plans would be expected to address these concerns.
Ch. 11; T9	Temporary 'caving' of pavements to allow overhead construction should be as wide and as high as possible, well lit, and with frequent escape gaps to avoid fear of crime	1	West London Line Group	Noted
Ch. 11; T9	In order to achieve moving freight/construction materials by the waterways, the OPDC must stipulate developers do so, otherwise they will not for 'viability' reasons	1	West London Line Group	Noted. T8 notes how development proposals will only be considered where they make maximum use of rail and water transport for construction deliveries.
Ch. 11; T9	Space to be provided for an 18-car siding to encourage transport of material by rail	1	West London Line Group	Noted. OPDC promotes maximum use of rail for construction and freight activity (Policy T8)
Ch. 11; T9	Suggestion of a scheme whereby anyone wanting to move a lorry across a specified cordon needs to pay £X before they are able to do so	1	West London Line Group	Noted. This is too detailed a consideration for the Local plan. These solutions will be investigated as part of the construction and logistics strategy. Which OPDC is commissioning.
Ch. 11; T9	More information needed for Construction Policy T9	1	West London Line Group	Noted. This has now been updated (see T8)
Ch. 11; T9, a) & para. 11.75	Policy T9 should explicitly state: development required to demonstrate how it implements the OPDC/TfL Construction Logistics Strategy	1	GUA	Change proposed. T8 highlights how Construction Management Plans (CMPs) and Construction Codes of Practice (CCoPs) must be submitted by developers. These will be informed by the OPDC/TfL Construction Logistics Strategy.

Ch. 11; T9 with reference to T8 (para. 11.67) & P9	Policy T9 should explicitly set out transparent, objective planning criteria to be used to determine the location of any Consolidation Centre mentioned in T8 & P9 (HS2 worksites)	1	GUA	Change proposed. Use of existing and proposed consolidation centres outside of the OPDC boundary will be promoted to reduce construction and freight related road trips.
Ch. 11, T8	Canals and River Trust usually require developers to undertake a feasibility study into the use of the canal for moving materials during the demolition, construction, and occupation phases of the development, as supported by the London Plan	1	Canals and River Trust	Change proposed. The policy promotes maximum use of water to move construction material. OPDC will work with Canals and River Trust to ensure developers follow the correct process to utilise the canal to transport construction materials.
Ch. 11, T8	Policies to manage freight activity need to be considered at strategic West London level; this would allow coordination with linkages to Heathrow and strategic road network	1	Heathrow	Noted. Westrans and TfL will help to manage freight activity at a strategic West London level
Ch. 11, T8, d), pg. 280	Policy should acknowledge demand for home deliveries to residential developments and design should reflect this	2	GLA, TfL	Noted. T7 highlights how OPDC is seeking to provide provision of click and collect space. Delivery collection centres will be required at appropriate public transport interchanges in order to minimise the number of vehicular deliveries to residential units. For residential deliveries T7 also advocates that off street solutions for servicing should be adopted, where possible, utilising different ground levels including basement and void areas within multi storey structures
Ch. 11, T8	Policy too focussed on HGV movements; should set out plan to manage growth in van movements	2	GLA, TfL	Noted. T7 includes policies which are aimed at freight more broadly and thus includes HGVs and vans.

Ch. 11, T8	Consideration should also be given to the development of a Delivery and Servicing Strategy to ensure a coordinated approach, enabling the movement of freight vehicles at the right time and place, in a safe, clean and efficient way	2	GLA, TfL	Noted. T7 ensures that developers produce and implement a Delivery and Servicing Plan which show how deliveries and servicing requirements will be managed in a safe, clean and efficient way.
Ch. 11, T8, a); pg. 280	DSPs will require co-ordination between different development sites including any commitment to sharing facilities (e.g. wharves, consolidation centres, rail freight termini). This coordination could be achieved by site-wide or 'framework' DSP.	2	GLA, TfL	Noted.
Ch. 11, T8, a); pg. 280	Individual DSPs should include information on vehicle volumes, routes (avoiding congested or sensitive locations), timing (avoiding the peak hours), a method of measurement & enforcement	2	GLA, TfL	Change proposed. T7 ensures that individual DSPs address information on vehicle volumes, routes (avoiding congested or sensitive locations), timing (avoiding the peak hours), a method of measurement & enforcement by requiring developers to produce and demonstrate this.
Ch. 11, T8, c)/d); pg. 280	Ensure sufficient space for off-street provision for servicing/facilities for deliveries, specifically in 'car-free' developments	2	GLA, TfL	Change proposed. T7 ensures that where possible, developers provide off-street servicing facilities within all new developments.
Ch. 11, T8, e); pg. 280	Consider an estate concierge service as a way of reducing van congestion	2	GLA, TfL	Noted. Policy T7 seeks to maximise the use of more efficient and sustainable ways of delivering goods including the use of rail, water, electric vehicles, cargo bikes and last mile deliveries by sustainable modes
Ch. 11, T8, f); pg. 280	Electric vehicles should be mentioned in addition to cargo bikes	2	GLA, TfL	Change proposed. T7 now includes reference to cargo bikes, electric vehicles and other sustainable modes in the delivery of goods.

Ch. 11, T8, g); pg. 280	Questioning whether FORS Gold accreditation is necessary/ realistic for all operators - FORS Silver accreditation would be sufficient (no difference in vehicle standards).	3	GLA, TfL, SEGRO	Change proposed. T7 now includes Silver Fleet Operator Recognition Scheme (FORS) accreditation.
Ch. 11, T8, g); pg. 280	FORS accreditation for construction vehicles would be enforceable but requiring all delivery and servicing vehicles operating in the area to be FORS accredited may be unenforceable in practice	2	GLA, TfL	Noted. However, OPDC as per T7 policy will still advocate that operators of all freight vehicles operating in the area include FORs accreditation for their freight vehicles.
Ch. 11, T8; 11.66; pg. 281	Need to explain what 'white labelling' is and its potential benefits	2	GLA, TfL	Change proposed. White labelling reference removed.
Ch. 11, T8, h); pg. 280	Designation as ULEZ to achieve use of safest and greenest vehicles	2	GLA, TfL	Noted. OPDC promotes use of low emissions vehicles and Silver FORS
Ch.11, T8, alternative policy option 2; pg. 282	Banning large vehicles and replacing with smaller vehicles is likely to add to congestion and the safety risk (as these would have to be replaced by more smaller vehicles) e.g. 1 x articulated vehicle = 24 vans	2	GLA, TfL	No change proposed. OPDC will not be going forward with this alternative policy.
Ch.11, T8; 11.67; pg. 281	Policy on potential consolidation centre needs to be clear about what type this would be, what it would achieve and how	2	GLA, TfL	Noted. T7 highlights how Developers must utilise consolidation centres to minimise their impact on the road network. Evidence should be provided within the DSP to demonstrate usage of consolidation centres. Justification should be provided if developers indicate they cannot use a consolidation centre.
Ch.11, T8; 11.67; pg. 281	Securing land only one aspect of putting in place consolidation centre - there needs to be a model in place for who will finance, construct and operate the centre all the way through to securing its use	2	GLA, TfL	Change proposed. OPDC support use of consolidation centres managed by others outside of boundary

Ch. 11, T8, h); pg. 280	Further detail needed about OPDC's aspirations for freight movements and how any safeguarding for 'future innovative and smart technologies' might work.	1	SEGRO	Noted. T7 policy now includes the need for developers to implement and safeguard for future innovative and smart technologies in relation to freight, servicing and delivery that maximise the efficiency and interoperability of the transport network, including measures such as holding bays optimisation and demand responsive deliveries. Justification text has also been updated. Smart technology is also covered through Policy EU11.
Park Royal Transport Study	Future Freight' study by University of Westminster referenced in PRTS not available	1	DP9	Noted.
Ch.11; T9	HS2 requirements for FORS (set out in their Route-Wide Traffic Management Plan) to be recognised in the local plan	1	HS2	Noted. T7 recognises the importance of FORS by ensuring that the operators of all freight vehicles operating in the area have attained the (FORS) accreditation
Ch. 11, T8; 11.67; pg. 281	Opposition to proposed siting of consolidation centre at HS2 compound on Atlas Road (reasons including traffic, pollution, duration of land-take)	2	Old Oak Interim Forum; Midland Terrace Resident's Group	Change proposed. There are currently two consolidation centres in West London and additional consolidation centres are being proposed. The use of a consolidation centre outside of the OPDC boundary would help to minimise vehicle journeys and improve delivery reliability and efficiency and therefore benefit users.
Ch. 11, T8; 11.67; pg. 281	Consolidation centre needs to be further out - distance between site and area it serves is too small to be effective	2	Old Oak Interim Forum; Midland Terrace Resident's Group	Change proposed. There are currently two consolidation centres in West London and additional consolidation centres are being proposed. OPDC promote use of these in policy T7 and T8
Ch. 11; T8	Freight policy needs to make reference to use of canal and commit to maximising use of it for freight purposes	1	Inland Waterways Association	Change proposed. T7 states that where possible freight goods will be delivered using the canal.

Ch. 11; T9/Ch. 12; EU4	Consider siting of new wharf in Old Oak area to allow for transportation of waste by water to existing Twyford Waste Transfer Station	1	Inland Waterways Association	Noted. OPDC encourages opportunities to use rail and water transport for freight to be explored in policy T7
Ch. 11; T8	Long-term contracts for energy centre fuel supplies such as wood-chip or other safe combustibles should be explored as potential avenue for using canal for freight	1	Inland Waterways Association	Change proposed. T7 states that where possible freight goods should be delivered using the canal.
Ch. 11; T8	Freight vehicles should be equipped with 'cyclist-friendly' cabs	1	Inland Waterways Association	Change Proposed. T7 states that all freight vehicles operating in the area should be signed up to the Silver Fleet Operator Recognition Scheme which promotes safety.
Ch. 11; T8	Freight consolidation centre must have immediate access to A40 or A406	1	Inland Waterways Association	Change proposed. There are currently two consolidation centres in West London and additional consolidation centres are being proposed. The use of a consolidation centre outside of the OPDC boundary would help to minimise vehicle journeys and improve delivery reliability and efficiency and therefore benefit users.
Ch. 11; T8	Need to assess if encouraging increased waterborne freight on the canal has an impact on residential moorings	1	Inland Waterways Association	Noted. T7 notes how the use of the canal for delivery of freight will be considered where appropriate and will therefore take into account potential impact on residential moorings
Ch. 11, T8; 11.67; pg. 281	Primary routes do not connect to proposed site of consolidation centre (HS2 site)	1	Inland Waterways Association	Change proposed. There are currently two consolidation centres in West London and additional consolidation centres are being proposed. The use of a consolidation centre outside of the OPDC boundary would help to minimise vehicle journeys and improve delivery reliability and efficiency and therefore benefit users. OPDC is no longer proposing a consolidation centre on this HS2 site

Ch. 11; T8	OPDC should consult PBA's work on canals and waterways to inform their policy on waterborne freight	1	Inland Waterways Association	Noted. This is too detailed a consideration for the Local plan. These solutions will be investigated as part of the construction and logistics strategy, which OPDC is commissioning.
Ch. 4; P4	Need to manage the number of residential moorings on the canal - not too much	1	Inland Waterways Association	Noted. OPDC will work with strategic partners, including the Canal and River Trust to effectively manage the waterways in Old Oak and Park Royal.
Ch. 11; T8	Need to consider last-mile of freight - amenable to smaller & electric vehicles	1	Inland Waterways Association	Change proposed. T7 notes how OPDC will seek to maximise the use of last mile deliveries by sustainable modes
Ch. 11; T8	Certain parts of Park Royal should progressively ban HGV and LGV access, where it improves the local street scene, visually and safety-wise, and causes no discernible economic harm.	1	Inland Waterways Association	No change proposed. OPDC seek to provide measures to coordinate and reduce freight, servicing and delivery trips however Park Royal is critical to London's industry and such an approach would likely lead to economic harm.
Ch. 11; T9	The tunnel that HS2 Ltd is building for spoil removal and tunnel-lining segment transfer should be reused afterwards.	1	Inland Waterways Association	Noted. OPDC will continue to discuss the potential use of this with HS2.
Ch. 11; T8	An extension of the Post Office Railway to the new Stonebridge Park Royal Mail site was considered at one time. The same thing should be done to reach Old Oak Common, for possible emerging logistics use – even if the idea is quickly dropped.	1	Inland Waterways Association	Noted. This is too detailed a consideration for the Local plan but will be considered in the Construction and logistics strategy, which OPDC is commissioning.

Ch. 11; T8	Proposed use of HS2 site as future consolidation centre not previously raised with HS2 Ltd	1	HS2	Change proposed. There are currently two consolidation centres in West London and additional consolidation centres are being proposed. The use of a consolidation centre outside of the OPDC boundary would help to minimise vehicle journeys and improve delivery reliability and efficiency and therefore benefit users. OPDC is no longer proposing a consolidation centre on the HS2 sites.
Ch. 11; T1	Strategic policy should promote more step-free transport	1	GLA	Noted. T5 seeks to ensure step free access is provided from all entrances to platforms to ensure any route to, from or through the station is accessible to all. OPDC is also advocating the Healthy Streets Approach and this promotes the use of streets which are open and accessible to all.
Ch. 11; T10	Need a commitment for travel plans to improve transport provision for mobility and visually impaired users	1	GLA	Change proposed. This is now included in the supporting text to Policy T9.
Ch. 11; T10, b)	The London Freight Plan (2007) is out of date, therefore OPDC should set out criteria that should be used to inform CLPs and DSPs pending the update of the LFP	1	GUA	Change proposed. The requirements for DSPs are set out in policy T7. CLP requirements will be informed by best practice and guidance from TfL and Westrans. The construction and logistics strategy will further inform the requirements for CLPs.
Ch. 11; T10	TfL guidance on TAs is not fit for purpose regarding barriers to disabled travellers	1	Hammersmith and Fulham Disability Forum	Noted. The Healthy Streets approach, and T2 indicates that developments will be supported where they deliver inclusive and accessible transport provision. This has been included in the supporting text for T9.

Ch. 11; T10; 11.81; pg. 286	change text from the 'Justification 11.81 The Travel Plan should be secured by a planning obligation and include ongoing management.' to 'Justification 11.81 The Travel Plan should be secured by a S106 and include ongoing management'	1	LBHF	Change proposed. Officers will secure obligations as necessary, using appropriate tools. Wording has been changed to "Travel Plans should be secured appropriately".
Ch. 11; T10; 11.81; pg. 286	Section 11.81 - As well as monitoring Travel Plans there should be a requirement for reporting progress towards meeting Travel Plan objectives.	1	TfL, GLA	Noted. The justification text of T9 states that Travel Plans should be secured appropriately and include ongoing management and monitoring to ensure targets are met.
Ch. 11; T1	East-west 'river bus' service using canal	1	Resident	No change proposed. OPDC will promote the canal as a walking and cycling route and will also be looking to use the canal to transport goods for freight and construction. OPDC will not object to river boat services however this will be required to demonstrate that it will not have a negative impact on existing operations.
Ch. 11; T1	Bridge over WCML/high street link should be ped/cycle only	1	Resident	No change proposed. Old Oak High Street is being proposed as a pedestrian, cycle and bus link, where feasible, to enable important bus connectivity
Ch. 11; T1	Need to consider impact on surrounding areas to OPDC boundary	1	Resident	Noted. SP7 and T1 highlights how OPDC will endeavour to mitigate the impact of development on the surrounding local and strategic road network.
Ch. 11; T1	Big changes to the area, needs to be done with sensitivity	1	Resident	Noted. OPDC recognise that development of such scale needs to be handled sensitively. These requirements have been embedded throughout the Local Plan.
Ch. 11; T6	Need to consider how to improve A40 junction capacity	1	Resident	Noted. OPDC will work with TfL and other strategic partners on improvements to the A40.

Ch. 11; T7	Consider car clubs to encourage car-free developments	1	Resident	Noted. T4 seeks to promote car club vehicles where car-free developments are not possible. It also recognises that car clubs bays should be designed into the new development areas from the outset.
Ch. 11; T1	Transport is a challenge for businesses in the area - currently, most efficient way to get in is to drive	1	Resident	Noted. The OPDC development seeks to improve transport and connectivity in the area and reduce the necessity to use the private car to get around in addition to encouraging modal shift through soft measures.
Ch. 11; T1	Set air quality goals early, as they will affect thinking on transport policy and the mix of different modes	1	Resident	Noted. The transport chapter should be read in conjunction with other chapters of the Local Plan, especially the Environment and Utility Policies, which outline the importance of mitigating against air quality (EU4).
Ch. 11; T1	Need to set aside space needed for the infrastructure to support smart transport technologies e.g. fibre optics, wireless etc.	1	Resident	Noted. OPDC development wants to be at the forefront of smart technologies in transport as a whole. Specifically, T7 seeks to implement and safeguard for future innovative and smart technologies.
Ch. 11; T4	Look again at North and West London Light Rail project since there is an existing structure in place that only requires minor tweaking to allow connections between Finchley Central to Ealing Broadway via Taylor Lane and North Acton	1	Resident	Noted. TfL will investigate the need to increase the capacity of the NLL and WLL
Ch. 11; T1	Canal/water transport needs its own policy to make more/best use of the canal	4	Residents	No change proposed. There is a separate place policy for the Grand Union Canal (P3), which achieves this. There are numerous references to the canal/water in the transport chapter. T1 and T3 look to address the use of the canal for walking, cycling and healthy streets. T7 and T8 recognise the importance

				of the canal/water in delivering goods and construction materials.
Ch. 11; T4	Retain ability to observe trains at Willesden Junction (footbridge over the WCML) as it is a major trainspotting location	1	Hammersmith and Fulham Historic Buildings Group	Noted. OPDC is proposing additional crossings of the WCML to improve connectivity across Old Oak which will provide opportunities to observe trains.
Ch.11; T1	Concern that Harlesden town centre will suffer as a result of development in old oak (reduced footfall) - what will be done to support community through transition?	1	Resident	Noted. The supporting documentation states that pedestrian and cycle links to Harlesden Town centre via Station Road and Harrow Road must be enhanced. Any new major proposals within Old Oak will also be required to submit a Harlesden Enhancement Strategy (see policies P1, P2 and P11).
Ch. 11; T6	Show how new roads will affect existing routes so residents can know what to expect and plan accordingly	1	Resident	Noted. The indicative street network is included in the local plan (in Policy T1) so that residents are aware of new roads and their relationship with existing routes. As proposals come forward, they will be required to highlight existing and proposed routes and these will be subject to public consultation.
Ch. 11; T8	Encourage commercial traffic away from residential areas	1	Resident	Noted. T1 highlights modal hierarchy and which types of streets are appropriate for different modes of transport.
Ch. 11; T9	Provide shuttle bus for residents during construction (to avoid unpleasant walking environments?)	1	Resident	Noted. Whilst there will be no proposals for shuttle buses to run during the construction period, OPDC recognise likely impacts during construction and have specifically outlined that temporary provision for buses should be

				considered during the construction stage (Policy T6)

12. Environment and Utilities

Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
12. Environment and Utilities, Policy EU1	Areas like Old Oak and Park Royal (OOPR) must be planned, designed and delivered to be net zero carbon or even carbon positive. Delivering zero carbon high quality neighbourhoods goes beyond sustainability and is about restorative regeneration.	1	London sustainable Development Commission	Change proposed. OPDC's Environmental Standards Study sets out standards that aim to ensure that OPDC becomes a zero carbon or carbon positive development. These standards, where relevant, have been incorporated into the Local Plan.
12. Environment and Utilities, Policy EU2	Should set an ambition for how Smart Tech would help meet the vision and particular objectives.	1	London sustainable Development Commission	Noted. Smart technology is constantly evolving so it is difficult to predict now what specific technologies would help to support OPDC's vision and objectives, but Policy SP2 does recognise the role that smart technology can play in promoting sustainability and smart policy in the environment chapter requires that major development submit a smart strategy to show how development is being designed flexibly to consider the emergence of new technology.
12. Environment and Utilities, Policy EU4	Existing waste sites in Old Oak cause air pollution and there should be recognition that these uses do not sit well with residential uses	1	Resident, Environment Agency	Noted, the waste policy recognises this and requires waste sites to mitigate their impacts on the environment

12. Environment and Utilities, Policy EU8, GI and Open Space Study	Support for OPDC undertaking a Green Infrastructure and Open Space Study	4	2 Residents, London Sustainable Development Commission, 1 resident	Noted. This is included in OPDC's Environmental Standards Study
12. Environment and Utilities, Policy EU4	Support policy EU4 and requirement to relocate waste sites to other suitable and accessible sites	3	104-106 Scrubs Lane & 108 Scrubs Lane (Quod), Bedford Borough Council and Central Bedfordshire Council, Old Oak Park (DP9)	Noted. A sequential process for relocation has been incorporated into the revised waste policy.
12. Environment and Utilities, Policy EU2	Provision of open and useable data to OPDC should not be a policy requirement. Support alternative option	1	Aurora Developments Ltd (Quod)	No change proposed. OPDC proposes to continue to require developments to provide or where appropriate adopt smart city systems that provide interoperable, open and useable data.
12. Environment and Utilities, Policy EU3, Figure 130	Definition of Surface water 30 is required in the Figure's key and map should differentiate between floor zones 3a and 3b	3	Boropex Holdings Limited (Montagu Evans), Brent Council, Greater London Authority	Change proposed. This clerical error has been corrected in the revised draft local plan

12. Environment and Utilities, Policy EU9	Object to policy as policy as currently worded is too supportive of fracking and this would have significant detrimental environmental impacts	2	Brent Council, Hammersmith and Fulham Council	No change proposed. Policies are required to plan positively for their area and the NPPF requires planning authorities to include policies on the extraction of minerals.
12. Environment and Utilities	Local Plan should have policies on light pollution and odour	8	Brent Council, the Hammersmith Society, Grand Union Alliance, 5 residents	Noted. These issues are considered too detailed for the local plan, but OPDC recognises the importance of these issues and is proposing that policy guidance for these would be provided in a forthcoming SPD on environmental standards which could include consideration of light pollution, odour and other impacts
12. Environment and Utilities, Policy EU8	The Green Infrastructure and Open Space Study needs to take account of LB Brent's SINC Study and SINC boundaries should be amended to accord with Brent's 2014 SINC study.	1	Brent Council	Change proposed. OPDC has produced a SINC Statement to accompany the Regulation 19 draft Local Plan. This has incorporated recommendations from Brent's SINC Study
12. Environment and Utilities, Table 13	Environmental standards in the London Plan should be the minimum standards in the OPDC area	1	Brent Council	Noted. OPDC has commissioned its own Environmental Standards Study. This has attempted to push and develop the London Plan standards, but recognises that this may be challenging given the densities being promoted through the Local Plan. The recommendations from the Environmental Standards Study have been appropriately embedded throughout the Local Plan.
12. Environment and Utilities, Policy EU3	Policy should cross-reference the Thames River Basement Management Plan 2015	1	Brent Council	Change proposed. The Thames River Basement Management Plan is referenced in the supporting text to the water policy

12. Environment and Utilities, Policy EU3	Support above ground water attenuation	1	Brent Council	Noted.
12. Environment and Utilities, Policy EU4	Text should make it clear that proposals for waste development should accord with the West London Waste Plan and that any relocation would need to accord with WLWP policy 2.	1	Brent Council	Change proposed. The waste policy clearly references the need for developments to comply with the WLWP policies.
12. Environment and Utilities, Policy EU4	Policy should support use of local waste sites and contractors to minimise transport impacts	1	Brent Council	Change proposed. The need to work with local waste sites is recognised in the supporting text to the waste policy and in the construction policy in the transport chapter
12. Environment and Utilities, Policy EU5	The alternative option for EU5 should be the alternative option for EU4	1	Brent Council	Change proposed. The alternative option for EU4 is correct. There should not have been an alternative option for EU5 - an alternative would have been to not support the principles of the circular economy.
12. Environment and Utilities, Policy EU8	The Plan needs to set ambitious standards for habitat creation	1	Brent Council	Change proposed. The plan now includes a more detailed urban greening and biodiversity policy aimed at ensuring that development is biodiversity policy. This has been informed by OPDC's Environmental Standards Study.
12. Environment and Utilities, Policy EU8	OPDC should indertake a tree survey and consider the inclusion of a tree policy	2	Brent Council, 1 resident	Change proposed. Policy EU2 promotes an optimised approach to tree planting, particularly mature and semi-mature trees and the policy also requires development proposals to be biodiversity positive. A tree survey is considered to be a too detailed study for the Local Plan, but a survey could be undertaken as part of a future SPD on environmental standards.

12. Environment and Utilities, Policy EU8, Figure 133	The figure needs updating to include Grade II Site of Importance for Nature Conservation at: · Coronation Gardens to the south of Lakeside Drive · South of Rainsford Road, First Central Site. · West of Rainsford Road, First Central Site.	1	Brent Council	Change proposed. These have been identified in OPDC's SINC statement and included in OPDC's policies map.
12. Environment and Utilities, Policy EU9	The geology of the OPDC area is not appropriate for shale gas production	1	Brent Council	Change proposed. The supporting text wording has been revised to clarify that the OPDC area is likely to be unsuitable for shale gas production.
12. Environment and Utilities, Policy EU10	Air quality policy should recognise that although traffic is the main source of air pollution, other sources will also contribute to pollution such as construction activities and local industry	1	Brent Council, Old Oak Interim Forum	Change proposed. Reference to the variety of sources of air pollution is included in the revised air quality policy (EU4).
12. Environment and Utilities, Policy EU3	The Grand Union Canal could accept surface water drainage but the Canal and River Trust does not accept additional flood risk liability and works would be required to the Regent's Canal weirs	1	Canal and River Trust	Noted. Recognition of the potential for surface water drainage into the Canal has been included in the Local Plan, but that any proposed outfalls would need agreement from the Canal and River Trust

12. Environment and Utilities, Policy EU6	The Grand Union Canal could be used for heat recovery and cooling purposes	3	Canal and River Trust, The Hammersmith Society, 1 resident	Noted. The potential for heat recovery and cooling from the canal was investigated as part of OPDC's Utilities Study. OPDC's Local Plan prioritises the use of secondary heat sources (such as the Grand Union Canal) where viable.
12. Environment and Utilities, Policy EU4	The Policy should set out a sequential approach to the relocation of waste sites, prioritising the OPDC area, Hammersmith and Fulham or thw West London Waste Plan area	2	City of London Corporation, North London Waste Plan	Change proposed. A sequential approach to the relocation of waste sites is now included in the waste policy.
12. Environment and Utilities, Policy EU1	Support the setting of environmental standards for the OPDC area	1	Diocese of London	Noted.
12. Environment and Utilities, Policy EU1	Reducing greenhouse gas emissions is critical as part of any environmental standard setting	1	Diocese of London	Noted. Reducing carbon emissions is an integral part of the overarching environmental sustainability strategy in the Local Plan. Policy EU9 expressly deals with this.
12. Environment and Utilities, Policy EU3	The climate change allowance guidance has recently been updated and this should be taken into account when assessing flood risk	2	Environment Agency, Old Oak Park (DP9)	Change proposed. This has been factored into the modelling as part of the IWMS and has been incorporated as a requirement in the water policy.
12. Environment and Utilities, Policy EU3	Need to undertake a Flood Risk Sequential Test to support the next draft Local Plan	1	Environment Agency	Noted. This is included within the IWMS.

12. Environment and Utilities, Policy EU3	Support Policy EU3	3	Environment Agency, Old Oak Park (DP9), Thames Water, london Sustainable Development Commission	Noted.
12. Environment and Utilities, Policy EU3	Amend policy to include requirements for surface water run-off to be clean and a 'good' quality standard, through treatment where necessary, prior to discharge/run-off to the Grand Union Canal (GUC) or the River Brent	1	Environment Agency	Change proposed. This requirement has been incorporated into the policy and is referenced in the IWMS.
12. Environment and Utilities and Development Infrastructure Funding Study	Costs for required water management schemes and green infrastructure should be included in the DIFS	1	Environment Agency	Change proposed. Where known, the costs for water infrastructure have been included in the IDP.
12. Environment and Utilities, Policy EU3	Remove reference to River Brent being used for additional water storage as the river already suffers from flooding	1	Environment Agency	Change proposed. The policy now requires development to demonstrate that development within the area at risk of fluvial flooding from the River Brent reduces flood risk and improves flood storage in the area
12. Environment and Utilities, Table 13	Water efficiency standard in the table should be per person per day rather than per household per day	1	Environment Agency	change proposed. This table has been removed from the Reg 19 local plan.

12. Environment and Utilities, Policy EU3	Support water efficiency measures but these may require a permit under the Environmental Permitting Regulations 2010	1	Environment Agency	Noted.
12. Environment and Utilities, Policy EU3	Roof water harvesting, if solely collected via man made impermeable surfaces, does not require a license	1	Environment Agency	Noted.
12. Environment and Utilities, Policy EU3	Use of above ground stormwater attenuation does not require a license	1	Environment Agency	Noted.
12. Environment and Utilities, Policy EU4	Policy should be amended to require that any waste sites relocated should be fully enclosed	3	Environment Agency, Old Oak Park (DP9), London Waste Planning Forum	Change proposed. The requirement for fully enclosed waste facilities is a policy requirement in Policy EU6.
12. Environment and Utilities, Policy EU5	Development proposals should include a waste strategy containing details of storage of waste, the method of collection by residents, the point of collection of the materials from the buildings and types of vehicles required.	1	Environment Agency	Change proposed. The requirement to make adequate provision is included within the waste policy and that this should accord with LWARB guidance on recycling and storage.
12. Environment and Utilities, Policy EU8	OPDC needs to undertake further work on green infrastructure requirements	3	Environment Agency, 3 residents	Change proposed. Further work has been undertaken as part of the Environmental Standards Study and policy requirements have been appropriately embedded in the Local Plan, specifically policies SP8, EU1 and EU2.

12. Environment and Utilities, Policy EU10	Support Policy EU10	2	Environment Agency, Old Oak Park (DP9)	Noted
12. Environment and Utilities, Policy EU10, Air Quality Study	Do not think it is possible to attribute air quality exceedances to a single source (the waste sites) without mentioning other sources or by providing evidence which demonstrated that this is the case	1	Environment Agency	Change proposed. Other sources of air pollution are referenced in the supporting text to the air quality policy.
12. Environment and Utilities, Policy EU10, Air Quality Study	Support Ultra Low Emission Vehicle Delivery Plan	1	Environment Agency	Noted.
12. Environment and Utilities, Policy EU10, Air Quality Study	Should provide “express routes” to get HGVs off small local roads and on to larger arterial routs such as the A40 and A406 should be considered and fitted with “green wave” (SCOOT) technology.	1	Environment Agency	Noted. Policy T8 deals with construction traffic management and supports the use of consolidation centres, maximum use of rail and water for transporting construction, use of local waste management sites and production of Construction Logistics Plans and Construction Code of Practices to manage construction impacts on highways
12. Environment and Utilities, Policy EU10, Air Quality Study	Monitoring station at Horn Lane should be used for monitoring	1	Environment Agency	Noted. This is outside of the OPDC area.

12. Environment and Utilities, Policy EU10, Air Quality Study, 3.7	text in para 3.7 of Air Quality Study should be amended to state: Over the last few years, exceedances of the 24-hour mean AQO for PM10 have been recorded at monitoring stations in the vicinity of the Old Oak and Park Royal area. These exceedances are associated with a number of sources such as the operation of waste sites, local, HDV and bus traffic, poor street cleaning, tyre and brake wear, weight restrictions over bridges forcing traffic on to smaller unsuitable roads as well as regional pollution episodes have all contributed to PM10 levels in the area.	1	Environment Agency	Change proposed. The Air Quality study has been amended to reflect these comments.
12. Environment and Utilities, Policy EU10, Air Quality Study, Page 66	Should reference use of rail and canal infrastructure to minimise road journeys and improve air quality	1	Environment Agency	Change proposed. Policy SP7 makes reference to the need to make optimal use of sustainable transport modes
12. Environment and Utilities, Policy EU10, Air Quality Study	Should promote enhanced street cleaning and CMA on major roads	1	Environment Agency	No change proposed. This is not a consideration for planning policy.
12. Environment and Utilities, Policy EU12	Support policy EU12	2	Environment Agency, Old Oak Park (DP9)	Noted

12. Environment and Utilities, Policy EU1	GiGL holds data that can be used for development of the Environmental Standards work and GI/Open Space Study	1	GiGL	noted.
12. Environment and Utilities, Policy EU10	Should integrate citizen science and the Internet of Things through air quality monitoring	1	GiGL	Noted. The potential for the Internet of Things to assist with air quality monitoring is covered through OPDC's smart policy.
12. Environment and Utilities, Policy EU8	Need to keep GiGL informed of any changes required to its species and habitat data of Site of Importance for Nature Conservation (SINC) boundaries	1	GiGL	Noted.
12. Environment and Utilities, Policy EU1, Table 13	Unclear where the zero carbon by 2020 requirement has come from as they do not correlate with the London Plan	1	Greater London Authority	Change proposed. This should have read by 2050, but has been removed from the Local Plan.
12. Environment and Utilities, Policy EU3, Para 12.24	reference to 'This intervention provides a small amount of rainfall attenuation during smaller, less intense storms' should be replaced by 'this intervention can provide a range of rainwater attenuation being referred to as 'blue roofs'	1	Greater London Authority	No change proposed. This text change is no longer relevant as the water text has been significantly altered for the Reg 19 Local Plan
12. Environment and Utilities, Policy EU3, Para 12.30	Its not clear how water separation can help to mitigate the poor water quality of the River Brent and Grand Union Canal	1	Greater London Authority	Change proposed. The water policy refers to the need for surface water run-off to be of a 'good' water quality standard.

12. Environment and Utilities, Policy EU4, Waste Strategy	Need to be clearer what MSW/CI waste activities on the Powerday site meet London plan criteria para 5.79, as a lot of this is going to landfill or incinerators outside of London, which does not count towards apportionment	1	Greater London Authority	Change proposed. Details relating to this have been included in the Waste Study in support of the Local Plan.
12. Environment and Utilities, Policy EU4, Waste Strategy	Should encourage existing waste site at Powerday to increase its reuse and recycling	1	Greater London Authority	Change proposed. The waste policy requires new or enhanced waste facilities to move waste up the waste hierarchy.
12. Environment and Utilities, Policy EU7	should consider installing a system such as RNIB react to help disabled people (particularly visually impaired people)	1	Greater London Authority	Noted. This would be a detailed design consideration for development proposals. The revised waste policy does require developments to provide appropriate details and training to occupants to support waste management and engage residents in waste recycling.
12. Environment and Utilities, Policy EU1	Policy needs to give greater directional steer for creating exemplary developments	1	Grand Union Alliance	Change proposed. The requirements for delivering high standards of sustainable development are reflected in the spatial vision, strategic policies and a series of more detailed policies throughout the Local Plan.
12. Environment and Utilities, Policy EU1	Should aim to secure exemplary developments in terms of environmental sustainability	1	Grand Union Alliance	Change proposed. The Local Plan has been updated to more clearly articulate how development should deliver high standards of environmentally sustainable development. These requirements have been embedded throughout the Local Plan and particularly in the strategic policies and design, transport and environment and utility chapters.

12. Environment and Utilities, Policy EU1	development should be future proofed to meet the challenge of climate change, flood risk, built and natural environments under pressure, environmental degradation and resource competition	2	Grand Union Alliance, London Sustainable Development Commission	Noted. The Local plan's environment and utilities chapter sets out a number of policies which aim to ensure that development appropriately minimises carbon emissions, mitigates the impacts of flood risk and makes sustainable use of resources and materials.
12. Environment and Utilities	Should have a policy that deals with environmental issues during the construction phase	1	Grand Union Alliance	No change proposed. Construction impacts are dealt with in Policy T8 in the transport chapter and through a series of policies in the Environment and Utilities chapter, specifically EU2 (urban greening), EU4 (air quality), EU5 (noise and vibration), EU6 (waste), EU7 (circular and sharing economy), EU8 (sustainable materials) and EU13 (land contamination)
12. Environment and Utilities, Policy EU1	The policy should have greater referencing to 'embodied carbon'. This is particularly relevant when considering whether an existing building can be converted rather demolished and replaced	3	Grand Union Alliance, The Hammersmith Society, 1 resident	Change proposed. Embodied carbon is covered in Policy EU8 (sustainable materials)
12. Environment and Utilities, Policy EU2	The policy has too narrow view of benefits of open data.	1	Grand Union Alliance	Change proposed. The policy and supporting text have been expanded to elaborate on the benefits of open data

12. Environment and Utilities, Policy EU3	There is a concern that open spaces, including Wormwood Scrubs, are expected to be the site(s) used.	1	Grand Union Alliance	No change proposed. The Local Plan proposes to continue to identify the potential for strategic SuDS to manage surface water. This could include the potential for attenuation on Wormwood Scrubs, which could also have benefits for biodiversity and help to manage the Scrubs' own surface water flooding issues. Any proposals for Wormwood Scrubs would need to be agreed by the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham
12. Environment and Utilities, Policy EU3	The policy lacks clarity and is uncertain in terms of delivery	1	Grand Union Alliance	Change proposed. The policy was uncertain in terms of delivery as there were still options under exploration. The policy is now much clearer with regard to OPDC's proposed approach to water minimisation, re-use and recycling and approach to addressing surface water flooding, taking a sequential approach of connecting into site-wide strategic SuDS where they exist and if not, dealing with surface water on a plot basis.
12. Environment and Utilities, Policy EU3	Policy (e) is not practical/effective. Counters Creek is unlikely to have capacity even for black water making the development proposal of Old Oak largely undeliverable given the multiple increases in demand.	1	Grand Union Alliance	No change proposed. Counters Creek is not used for blackwater sewage, except for in extreme flood events. A separate network to Beckton is used for blackwater. Counters Creek is primarily used for surface water/stormwater. The policy proposes that the area achieves greenfield run-off rate, meaning use of the Counters Creek for surface water and stormwater would be appropriately minimised.

12. Environment and Utilities, Policy EU3	Policy (f) & (g) fails to adequately alleviate flood risk and poor water quality, because there area areas in Park Royal not being redeveloped	1	Grand Union Alliance	Change proposed. The water policy now requires that outfalls into the canal are of a 'good' water quality. OPDC's Local Plan can only be applied to development proposals. The policies in the water policy would be equally applied to development proposals in Park Royal. Other measures included in the open space and urban greening/biodiversity policies (EU1 and EU2), will also support the sustainable management of surface water in Park Royal.
12. Environment and Utilities, Policy EU4	Policy (a) is out of date and is not justified. The OPDC has adopted the West London waste Plan, an already out of date plan, which safeguards an overprovision of sites to meet identified needs. There is no substantial justification for safeguarding Quattro as a waste site.	2	Grand Union Alliance, Osbourne Investments Ltd (Boden House) (Savills)	No change proposed. The West London Waste Plan is an adopted Development Plan Document. OPDC and the Western Riverside Waste Authorities will jointly consider the need for the review of the document following the review of apportionments in the next London Plan.
12. Environment and Utilities, Policy EU4	Do not support proposed expansion of throughput on the Powerday waste site, due to its environmental impacts	1	Grand Union Alliance	No change proposed. The policy continues to propose to increase operational capacity, where appropriate and the appropriateness would be considered against other factors such as noise, air quality and amenity.
12. Environment and Utilities, Policy EU4	Promoting energy from waste is a misunderstanding of the circular economy concept and there are more sustainable ways of achieving local energy production. The waste hierarchy should be referenced in the policy	3	Grand Union Alliance, WRc, London sustainable Development Commission	Change proposed. The policy firstly requires waste to be managed up the waste hierarchy with measures to minimise and re-use waste prioritised. OPDC has separate Circular and Sharing Economy and Sustainable Materials policies which also support this approach. However, aside from these approaches, there is a need to consider EfW, which can also be of benefit

				for OPDC's approach to district heating and cooling.
12. Environment and Utilities, Policy EU4	the Policy too narrowly based failing to drive waste management up the hierarchy and to contribute to the sustainable and efficient use of resources	1	Grand Union Alliance	Change proposed. Although the waste hierarchy is clearly articulated in the London Plan and OPDC has generally taken the approach to avoid repetition of London Plan policy, it is recognised that managing waste up the waste hierarchy is an important issue and this is now included in the revised waste policy.
12. Environment and Utilities, Policy EU4	Environmental infrastructure particularly for waste and recycling, should be fully integrated within housing developments	1	Grand Union Alliance	Change proposed. The waste policy requires development to make adequate provision for waste storage and collection within developments, in accordance with the London Waste Recycling Board's (LWARB) guidance on recycling and storage. The policy also requires developers to demonstrate a collaborative approach with the Waste Authorities and OPDC is being adopted to help deliver strategic waste management systems in order to meet national and London waste recycling targets

12. Environment and Utilities, Policy EU4	OPDC should encourage standardisation and co-ordination of procedures around waste and recycling, particularly as the development crosses multiple borough boundaries.	1	Grand Union Alliance	Change proposed. Local authorities currently have separate contracts for waste collection, but recognise the merit of attempting to align approaches in the future in this location. The policy requires developers to demonstrate a collaborative approach with the Waste Authorities and OPDC is being adopted to help deliver strategic waste management systems in order to meet national and London waste recycling targets and that in arrangements for storage and collection, consideration is given to working with waste authorities to ensure waste collection approaches align with current and future waste collection arrangements.
12. Environment and Utilities, Policy EU5	Policy should require that planning proposals should demonstrate adoption of Waste Hierarchy and Circular Economy principles in construction and operation stages and how occupiers/activities will minimise waste and maximise reuse, recycling and composting.	2	Grand Union Alliance, 1 resident	Change proposed. The Circular and Sharing economy policy is clear that the requirements apply to construction. Likewise, the waste policy supporting text clarifies that the requirement to manage waste up the waste hierarchy applies both during and post construction.

12. Environment and Utilities, Policy EU5	The London Assembly Environment Committee Growing, Growing, Gone Report, March 2016 gives a more accurate explanation of Circular economy which does not substantiate the proposal for energy from waste advanced in EU8 para12.51 and EU4 waste Management policy to which this comment also applies	1	Grand Union Alliance	No change proposed. OPDC has developed a detailed Circular and Sharing Economy Strategy in support of the Local Plan. This strategy and the Local Plan policies (specifically the Waste, Circular and Sharing Economy and Sustainable Materials policies) require waste to be managed up the waste hierarchy with measures to minimise and re-use waste prioritised. However, there is also a need aside from this to consider EfW, which can also be of benefit for OPDC's approach to district heating and cooling.
12. Environment and Utilities, Policy EU6	The policy has too limited scope; it should be broadened to include how greenhouse gas emissions should be minimised and should promote renewables/low carbon energy	5	Grand Union Alliance, Hammersmith and Fulham Council, 3 residents	Change proposed. The Reg 19 Local Plan includes a policy on minimising carbon emissions.
12. Environment and Utilities, Policy EU6	Policy (c)i is critically important to get correct.	1	Grand Union Alliance	Noted.

12. Environment and Utilities, Policy EU6	Information on the feasibility and implementation of the Energy Centre, connections, implementation and management, the impact of new regulations and renewable/innovative technologies is lacking. The size of an Energy Centre is likely to be large and its location is unknown. Analysis of the size and potential levels of nuisance and disturbance from the Centre have to be provided.	1	Grand Union Alliance	Change proposed. Details on the energy centre requirements are set out in OPDC's Utility Strategy and in OPDC's Infrastructure Delivery Plan (IDP).
12. Environment and Utilities, Policy EU6	Efficient, value for money decentralised energy network/CCHP/CHP needs an optimum number of users to be linked in. Development at North Acton is a missed opportunity.	1	Grand Union Alliance	Change proposed. The policy supports the need for developers to connect in to a strategic area wide network, where one is available at the time the development is being constructed. However, a strategic area wide network will require significant funding and financing to deliver and it may take time and so the policy also requires that where the area-wide network is not available or viable, the development should be future-proofed to connect into a future network when/if it becomes available and deliver on-site low carbon heat solutions.

12. Environment and Utilities, Policy EU6	Since overheating (as a result of the heat island effect) is increasingly a problem in the summer, cooling systems (CCHP) may need to be prioritised. Efficient use of CHP/CCHP requires 24hr mixed-use load demands via a mixed use development site. Hospitals and hotels, as good candidates, should be prioritised.	1	Grand Union Alliance	No change proposed. District cooling was explored as part of the utility study and is unlikely to be viable anywhere other than high density commercial areas. It therefore cannot be a planning policy requirement. However, separate to planning policy, OPDC will be exploring the potential for this to be delivered on parts of the public sector land and if it makes commercial sense, it would form part of OPDC's approach to ESCOs or IDNOs.
12. Environment and Utilities, Policy EU6	There would be a need for wayleave agreement when it comes to some getting linked into the heat and power network (E.g. Wells House Road and Midland Terrace).	1	Grand Union Alliance	Noted. This is not a planning issue, but the Local Plan requires that land required for infrastructure is safeguarded (SP10).
12. Environment and Utilities, Policy EU7	Policy should clearly explain that exemplary digital communications infrastructure should serve not only new development but also existing areas.	2	Grand Union Alliance, Midland Terrace Resident's Group	No change proposed. The Local Plan cannot require development proposals to enhance communications infrastructure for existing residents. However, OPDC is separately working with communications providers to consider arrangements to enhance communications infrastructure in the area, to benefit existing residents and workers as well as new developments.

12. Environment and Utilities, Policy EU8	The Policy lacks necessary strategy, analysis and proposals. It lacks a strategic approach and is not planning positively for it is not supported by up to date information, assessments and proposals about the natural environment/ecological networks that national and regional policy require and guidance advise	1	Grand Union Alliance	Change proposed. OPDC has undertaken further work as part of the Environmental Standards Study and Sites of Importance for Nature Conservation Statement. This has informed a set of more details policy requirements in the revised Local Plan, including policy SP8, EU1 and EU2.
12. Environment and Utilities, Policy EU8	Policy (a) should protect and enhance and relate to existing spaces There is a need to clarify and confirm that policy refers to existing spaces for national policy requires both protection and enhancement – not "or" – as well as creation and management	1	Grand Union Alliance	Change proposed. The revised policy requires proposals to measurably conserve and enhance SINCs and other identified priority habitats and species.
12. Environment and Utilities, Policy EU8	There should be a policy and locally appropriate guidance developed on the provision of green roofs, 'living walls' and spaces.	2	Grand Union Alliance, 1 resident	Change proposed. The Local Plan supports proposals that maximise the provision of green roofs and walls. Appropriate maximisation of this would need to be assessed on a case by case basis.
12. Environment and Utilities, Policy EU8	Policy should set out need for cross borough cooperation to mitigate impact and facilitate connectivity of networks and access for users of green infrastructure.	1	Grand Union Alliance	Change proposed. The need for cross-borough cooperation to deliver an integrated green infrastructure network is referenced in the supporting text to Policy SP8 (green infrastructure and open space).

12. Environment and Utilities, Policy EU8	Trees protection, planting of new large and small trees, and greening, and urban growing should be promoted and facilitated.	12	Grand Union Alliance, The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group, 9 residents	Change proposed. These requirements are all included in policies EU1 and EU2.
12. Environment and Utilities, Policy EU10	The policy insufficiently strategic and emphatic, lacking certainty in remedying poor air quality. It lacks a more strategic area wide approach to securing reductions in the levels of air pollutants by relying on site by site development proposals through individual air quality assessments. The OPDC policy language of “regard to”, “considers”, “aim to”, “seek to” is not sufficiently emphatic given the adverse health impact risks.	1	Grand Union Alliance	Change proposed. The policy has been updated to make the policy requirements more explicit. The supporting text also references the various designations which OPDC and TfL are considering for the area, including the expansion of the Ultra Low Emission Zone (ULEZ) and designation of Low Emission Neighbourhoods (LENs) and Zero Emissions Zones (ZEZs).

12. Environment and Utilities, Policy EU10	OPDC should have its own local air quality action plan to ensure optimum alignment with the Local Plan and the OPDC's potential to control development not only through planning policy.	1	Grand Union Alliance	Noted. OPDC is the local planning authority, it is not the statutory authority for environmental health. Boroughs have a statutory duty to still produce air quality action plans. However, OPDC will work with the boroughs and with TfL to consider how specific measures could be developed which appropriately promote air quality measures for the area. This includes considerations such as the expansion of the Ultra Low Emission Zone (ULEZ) and designation of Low Emission Neighbourhoods (LENs) and Zero Emissions Zones (ZEZs).
12. Environment and Utilities, Policy EU10	Add the following to AQS/local action plan: Rigorously and extensively monitor (with the boroughs) locations and sites contributing to poor air quality. In response to monitoring, mitigate any detrimental impact of existing and any increased levels of air pollution. Promote and proactively use interventions including 'filter stations', the planting of trees, shrubs etc., 'living walls' that effectively absorb pollutants. Actively promote and require the use of sustainable forms of transport, including by canal for the transportation of building materials.	1	Grand Union Alliance	Noted. Measures to improve air quality are cross-cutting and are included in a number of policies in the Local Plan. Measures that support sustainable transport modes and seek to minimise private vehicle usage are covered in Policy SP7 and in the Transport chapter. The requirements for green infrastructure provision and the multiple benefits of providing this are outlined in policies SP8, EU1 and EU2. The air quality policy requires developers to contribute to air quality monitoring stations and the policy also requires development proposals to reduce pollution in air quality focus areas, so they comply with the most up to date national air quality standards

12. Environment and Utilities, Policy EU11	Policy title: Add 'and Vibration'. Vibration is often associated with noise and also adversely impacts on health and quality of life. Should also set out who the controlling and monitoring bodies are	2	Grand Union Alliance, The Hammersmith Society	Change proposed. Vibration has been added to the policy.
12. Environment and Utilities, Policy EU11	the policy is inadequate – it omits improving the acoustic environment and protecting (relative) tranquillity areas.	1	Grand Union Alliance	Change proposed. The policy promotes the delivery of high quality soundscapes. New development and transport infrastructure planned for the area will make it challenging to protect areas which are considered to currently be tranquil, but the policy looks to ensure that developments adhere to national noise and vibration standards
12. Environment and Utilities, Policy EU11	The policy leaves out explicit requirement to minimise adverse noise impacts from development on neighbours – during site clearance through construction to full operation (NPPF 123).	1	Grand Union Alliance	Change proposed. This requirement is now included in the policy.
12. Environment and Utilities, Policy EU12	the Precautionary Principle should be incorporated in policy and text.	1	Grand Union Alliance	No change proposed. The need for precautionary principle does not need to be referenced as the 7 stage process outlined in the policy would require the appropriate identification and treatment of any decontamination

12. Environment and Utilities, Policy EU12	OPDC should take a more strategic approach to dealing with potential contamination (PPG 33-005). It is not sufficient to tackle this issue by responding to development proposals on a site by site basis as set out in EU12(a).	1	Grand Union Alliance	Change proposed. The policy has been revised to require developers to work collaboratively with OPDC and with other developers to consider a strategic approach to addressing contaminated land.
12. Environment and Utilities, Policy EU12	Development proposals should be assessed not only on conditions on that site, but also on surrounding sites, given the protracted build out periods envisaged	1	Grand Union Alliance	No change proposed. The existing Reg 18 policy and new Reg 19 policy both require the developer to mitigate impacts on adjoining sites.
12. Environment and Utilities, Policy EU12	It is essential that the relationships between the OPDC, the boroughs and EA are formalised in order that duties, responsibilities and resources are clearly allocated to achieve greater certainty that remediation will be secured and policy satisfactorily implemented	1	Grand Union Alliance	Noted. The supporting text for the land contamination talks about the need for developers to engage with all of OPDC, the local authorities and the EA. Land contamination is complex and is affected by a number of regimes. These are summarised in the 'Guiding Principles' EA guidance, which is referenced in the supporting text to the policy. It is not necessary or appropriate for these regimes to be listed in the supporting text to the Local Plan.
12. Environment and Utilities, Policy EU12, Decontamination Strategy	There is little emphasis in the strategy on site characterisation. It would be useful for more detail on this to be available prior to putting together the next draft of the Local Plan.	1	Grand Union Alliance	No change proposed. The policy requires that this step is undertaken by individual developers. It is not necessary for OPDC as planning authority to have to undertake this detailed analysis on behalf of developers. However, the appendix to the Development Infrastructure Funding Study does include some high level assumptions on likely ground contamination.

12. Environment and Utilities, Policy EU4, Waste Strategy	Strategy should be soundly based, deliver sustainable development and support the proper planning of the area.	1	Grand Union Alliance	Noted. OPDC considers that the waste policy supports and accords with this.
12. Environment and Utilities, Policy EU4	The relocation of existing waste sites within the OPDC area would be problematic due to their adverse environmental impacts	1	Grand Union Alliance	The requirement to re-allocate sites is identified in London Plan policy 5.17. In accordance with the proximity principle, OPDC has set out a sequential process for this.
12. Environment and Utilities, Policy EU4, Waste Strategy	The Supporting Studies Summary document incorrectly conflates energy from waste with recycling in its key recommendations.	1	Grand Union Alliance	Change proposed. This reference has been removed from the Waste Apportionment Study.
12. Environment and Utilities	Chapter title should be amended to 'natural environment and utilities'	1	Historic England	No change proposed. The chapter is not solely about the natural environment. It also deals with built environment considerations.
12. Environment and Utilities, Policy EU4	Need to be conscious of future amendments to apportionment targets and the Plan might require a development management policy to consider how applications for waste sites would be considered on windfall sites	1	Ealing Council	Noted. OPDC recognises that apportionments may change in future as part of future iterations of the London Plan. However, OPDC's policies can only be considered in regard to general conformity against the current London Plan. Applications for new waste sites would be considered against the criteria in waste policy EU6 and against other relevant Local Plan policies, in particular, policies in the Transport and Environment and Utilities chapters.
12. Environment and Utilities, Policy EU4, Figure 131	Figure 131 is inconsistent with the WLWP safeguards	1	Ealing Council	Change proposed. The boundary has been amended to appropriately identify the safeguarded waste site boundary.

12. Environment and Utilities, Policy EU8	Should identify potential for green roofs and walls	1	Ealing Council	Change proposed. This is included in Policy EU2.
12. Environment and Utilities, Policy EU9	This policy should provide more of a lead on managing fracking. It currently reads as just a criteria-based policy but there are clearly areas in OPDC such as key regeneration sites where this form of development will be unacceptable in principle	1	Ealing Council	Change proposed. The policy has been revised to clarify that sites identified for housing or within site allocations will not be appropriate for mineral extraction.
12. Environment and Utilities, Policy EU12	The policy/justification should reference that Local authorities hold the specific responsibility for the management of land contamination within their boundary under Part 2A of the EPA 1990 and will have to agree in writing any proposed submissions or actions with regard to the assessment or remediation of land contamination	1	Hammersmith and Fulham Council	Change proposed. This text has been incorporated into the policy's supporting text.
12. Environment and Utilities, Policy EU10	need to ensure that good indoor air quality is maintained where insulation is proposed for CO2 emission reduction.	1	Hammersmith and Fulham Council	Noted. Indoor air quality is referenced as an important consideration in Strategic Policy SP3. Policy EU4 also requires that developments appropriately minimise air pollution and make a positive contribution to overall improvement in air quality. This would include indoor air quality.

12. Environment and Utilities, Policy EU5	An additional point should be added to ensure that adequate soil treatment and similar facilities are incorporated to Waste Policies now in order to satisfy the proposals contained within the Decontamination Strategy.	1	Hammersmith and Fulham Council	No change proposed. Requirements to adequately treat soil on waste sites would be covered through the requirements set out in the land contamination policy.
12. Environment and Utilities, Policy EU4	Support safeguarding of Powerday waste site	1	Hammersmith and Fulham Council	Noted.
12. Environment and Utilities, Policy EU6	Add bullet to policy stating iii) Proposals will be expected to demonstrate they shall not have a negative impact on local air quality.	1	Hammersmith and Fulham Council	No change proposed. Requirements for energy infrastructure to minimise harmful emissions are covered in the air quality policy.
12. Environment and Utilities, Policy EU8	the preferred policy option should identify that greening should be used to improve air quality and/or minimise the exposure of people to poor air quality and help to manage surface water flooding.	1	Hammersmith and Fulham Council	Change proposed. Policy SP8 identifies the multitude of benefits of green infrastructure, including air quality. Provision of green infrastructure is also identified as a measure in the table accompanying the air quality policy.

12. Environment and Utilities, Policy EU9	There is a minor possibility of ballast and other materials being discovered during investigation or construction works which could become a useful resource over the duration of the project. Amend preferred policy option to start; Applications for mineral extraction, ~~including the exploration, appraisal and operation of unconventional oil and gas resources,~~ will be considered against the following criteria:	1	Hammersmith and Fulham Council	Change proposed. Amendments have been made to the policy and reference to ballast and potential other materials has been included in the supporting text.
12. Environment and Utilities, Policy EU9	Policy should state that any exploration should not contribute to poor air quality and that pollution to local land and perched waterways would also need to be considered as it would create an offence under the Environmental Damage Regulations 2009.	1	Hammersmith and Fulham Council	Change proposed. These requirements were already identified in the policy, but further clarification on the Environmental Damage Regulations has been included in the supporting text.
12. Environment and Utilities, Policy EU10	As the borough is an Air Quality Management Area (identified in the 'key issues') and due to the potential of these fines being levied on the Council, it is essential that the impacts of any development is agreed with the Council.	1	Hammersmith and Fulham Council	Noted. This need is included in the supporting text.

12. Environment and Utilities, Policy EU12	The regulator for land contamination is the Local Authority, not the Local Planning Authority. 12.104 Amend to include; After remediation under planning, as a minimum, land should not be capable of being determined as contaminated land as defined by Part 2A of the Environmental Protection Act 1990 by the relevant local authority.	1	Hammersmith and Fulham Council	Change proposed. Text has been added to the supporting text to clarify this arrangement
12. Environment and Utilities, Policy EU12	The full titles of CLR11 and the Guiding Principles should be included.	1	Hammersmith and Fulham Council	Change proposed. These have been added to the supporting text.
12. Environment and Utilities, Policy EU12	A reference to Part 2A of the EPA1990 should also be included as the primary definition of 'contaminated land', and the regulatory regime	1	Hammersmith and Fulham Council	Change proposed. This has been included in the supporting text to the policy.
12. Environment and Utilities, Policy EU12	Amend to: Regulatory advice and guidance is available to identify the principal matters which ~~both~~ the "Environmental Regulator" will Planning Authority ~~and environmental regulator~~ look to be undertaken when approaching redevelopment and land contamination.	1	Hammersmith and Fulham Council	No change proposed. This is already covered in the supporting text.

12. Environment and Utilities, Policy EU12	Insufficient understanding of the processes of land contamination assessment and management. Amend Where land is known or found to be contaminated, or where a sensitive use is proposed or exists, ADD "this decision to be made solely by the relevant local authority", developers will be expected to assess their proposals using the seven stage process	1	Hammersmith and Fulham Council	Change proposed. A number of changes have been made to the supporting text to address LBHF's concerns.
12. Environment and Utilities, Policy EU12	At end of point 1) in 12.109 add: Information collected by the relevant local authority as part of their preliminary review of historical land uses must be incorporated into the Preliminary Risk Assessment and any risk assessment without this information will not be accepted as complete under CLR11.	1	Hammersmith and Fulham Council	Change proposed. This text has been added to the supporting text to the policy.
12. Environment and Utilities, Policy EU12	There is no policy proposed to ensure that consistency of approach to the assessment and management of land contamination across the three local authorities	1	Hammersmith and Fulham Council	No change proposed. OPDC's land contamination policy would be applied equally across the three local authorities.
12. Environment and Utilities, Policy EU12, Contamination Strategy	A Global Remediation Strategy is a good approach to take at Old Oak	1	Hammersmith and Fulham Council, Old Oak Park (DP9)	Change proposed. The potential for developers to work collaboratively with ODC to consider a strategic approach to the remediation of land is contained in part c) of the land contamination policy.

12. Environment and Utilities, Policy EU12, Contamination Strategy	OPDC need to clarify who would be responsible for the global remediation strategies production and review and should set out how it will interact with local authority policies.	1	Hammersmith and Fulham Council	No change proposed. Any approach to global remediation would need to be agreed by multiple developers, in collaboration with OPDC and the local authorities.
12. Environment and Utilities, Policy EU12	an estimate of the volumes and types of material to be treated or disposed of must be made at the earliest opportunity	1	Hammersmith and Fulham Council	Noted. This is too detailed for the Local Plan but will be identified as part of the OPDC masterplan in support of potential future outline applications and would also be identified as part of individual development proposals.
12. Environment and Utilities, Policy EU12	If treatment works, such as a soil hospital are to be included in the overall waste management scheme for the ODPC site OPDC should set out when, how and where it will operate	1	Hammersmith and Fulham Council	Noted. It is too soon to know for sure where this will be located and it would be too inflexible to set requirements for this at this stage. This work would be undertaken in association with the OPDC Masterplan and outputs from this may inform future versions of the Local Plan.
12. Environment and Utilities, Policy EU10, Air Quality Study	There continues to be uncertainty as to what reductions will be achieved by replacement of older vehicles which is not detailed in the AQS.	1	Hammersmith and Fulham Council	Noted. The replacement of older vehicles is very difficult to predict and is too detailed a consideration for the Local Plan.
12. Environment and Utilities, Policy EU10, Air Quality Study	The AQS recommends that where possible, developments should not add extra emissions to the area, but the policy mechanisms do not help to achieve this, with regard to Policy 7 on freight	1	Hammersmith and Fulham Council	Noted. The Local Plan supports proposals that utilise freight consolidation centres. Other policies in the plan also require proposals to support the delivery of OPDC's sustainable transport policy (Policy SP7) and make use of the canal and rail for freight and construction (SP7, T7 and T8).

12. Environment and Utilities, Policy EU10, Air Quality Study	The AQS recommends that it is vital that construction activities are planned in detail and dust emissions are avoided as far as possible to avoid continued exceedance of the AQO, but Policy 5 does not adequately assure that this vital measure will be implemented	1	Hammersmith and Fulham Council	Noted. The potential for a construction monitoring website is too detailed an issue for the Local Plan and is being considered separately as part of OPDC's wider corporate activities.
12. Environment and Utilities, Policy EU10, Air Quality Study	Defra and the GLA have written to the Council calling for cooperation in tackling the problem of exceedences in nitrogen dioxide and fine particulate matter, including reminding the local authorities of Government powers that could require local authorities to pay the associated EU fines. This appears to conflict with the statement in section 2.2 " While district councils have a statutory duty to carry out LAQM, it is important to note that councils are not obliged to achieve the AQOs as they do not have sufficient control over all the sources that could potentially give rise to the breach"	1	Hammersmith and Fulham Council	Change proposed. This text has been revised in the updated air quality study
12. Environment and Utilities, Policy EU10, Air Quality Study	The relationship between breeze pathways and improved air quality needs to be expanded on in the Local Plan	1	Hammersmith and Fulham Council	Change proposed. The need to consider the orientation of buildings to minimise air pollution has been included in the updated air quality policy.

12. Environment and Utilities, Policy EU10, Air Quality Study	Section 2.4 should set out that LBHF has established a resident led Air Quality Commission that will recommend actions for the Council to include in a new AQAP	1	Hammersmith and Fulham Council	Change proposed. This wording has been added to the Air Quality Study.
12. Environment and Utilities, Policy EU10, Air Quality Study	OPDC should identify which boroughs the proposed monitors will be located in and detail how this data will be made available to members of the public and local authorities.	1	Hammersmith and Fulham Council	Noted. The locations for the monitoring stations are illustrated on the figure. Data would be published as part of OPDC's Authority Monitoring Report and would be connected to DEFRA's Automatic Urban and Rural Network (AURN) quality control standards. This has been clarified in the supporting text to the air quality policy.
12. Environment and Utilities, Policy EU10, Air Quality Study	Section 3.6 details the dispersion modelling completed, specifying exposure to traffic pollution modelled. It is not clear whether any point sources were considered for inclusion in the modelling. More information should be provided as to how these were considered/discounted.	1	Hammersmith and Fulham Council	Change proposed. Further details on the point sources has now been included in the Air Quality Study.
12. Environment and Utilities, Policy EU10, Air Quality Study	Concentrations were not modelled at varying heights when one of the key recommendations of the study is "Where possible, not locating residential units on the ground floor near to the A4000" Because varying heights have not been modelled this statement is not well supported, avoiding	1	Hammersmith and Fulham Council	Change proposed. This has been removed from the Air Quality Study.

	residential units on the ground floor may not go far enough			
12. Environment and Utilities, Policy EU10, Air Quality Study	Appendix C details model verification, the statement "under-predicted at a greater number of sites (26 as opposed to 17)" should be checked as the tables do not support this.	1	Hammersmith and Fulham Council	Change proposed. The figures have been corrected to 22 of 13.
12. Environment and Utilities, Policy EU10, Air Quality Study	The air quality study should detail why street canyons, noise barriers, buildings and complex terrain were not modelled.	1	Hammersmith and Fulham Council	No change proposed. These were not modelled because the exact layout of development is not yet fixed. These would need to be modelled as part of detailed development proposals, in accordance with Policy D6
12. Environment and Utilities, Policy EU10, Air Quality Study	The results for the 163 receptors modelled have been presented visually but not tabled, which should be provided as an appendix to assist with review of the document.	1	Hammersmith and Fulham Council	Change proposed. This has now been included in a table.

12. Environment and Utilities, Policy EU10, Air Quality Study	Policy 12 states “developments should not create a new “street canyon” or a building configuration that inhibits effective pollution dispersion” This should be expanded to detail that dispersion modelling should utilise models that offer advanced treatment of street canyon.	1	Hammersmith and Fulham Council	Change proposed. The requirement to appropriately model wind is included in the supporting text to the air quality policy and the main body of the amenity policy (D6).
12. Environment and Utilities, Policy EU10, Air Quality Study	Policy for operational phase 15 assessment for planning purposes should provide more detailed guidance as to how dispersion modelling should be completed and confirm when advanced modelling tools should be utilised such as ADMS advanced street canyon modelling, to ensure a consistent approach to air quality assessment.	1	Hammersmith and Fulham Council	Change proposed. The table in the supporting text to policy D6 identifies OPDC's suggested approach to urban wind modelling. The benchmark is identified as Bre 380 at masterplaning scale and the Lawson Wind Comfort Criteria at building level, using wind tunnel testing or alternatively Computational Fluid Dynamics.
12. Environment and Utilities, Policy EU4	The relevant waste policies would need to be drafted to ensure that the OPDC receive and deal with all of the borough’s waste apportionment target, which is currently being met by the EMR and Powerday waste sites in the Old Oak Opportunity Area.	1	Hammersmith and Fulham Council	Change proposed. The allocation of the Old Oak sidings site deals with all LBHF's apportionment target, which is clarified in both the policy and supporting text.

12. Environment and Utilities, Policy EU10	Policies must be amended to reflect the council's statutory duties relating to land contamination. They currently seek to consult the borough but in fact must agree any proposals with borough.	1	Hammersmith and Fulham Council	Change proposed. The need to seek agreement from the local authorities has been included in the supporting text to the policy.
12. Environment and Utilities, Policy EU1	Policy EU1 would benefit from some 'success measures' that the public can readily understand and get behind.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. The Local Plan is supported by Key Performance Indicators (KPIs), which will monitor the success of the policies.
12. Environment and Utilities, Policy EU3	The next version of the OPDC Local Plan needs to provide firm assurances that surface water flood risk in Old Oak and the surrounding area has been addressed.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. The Local Plan policy on water requires development to appropriately address surface water and achieve greenfield run-off rates
12. Environment and Utilities, Policy EU5	On Policy EU5c, this should include the words 'make adequate provision for' and well as 'investigate'.	2	Midland Terrace Resident's Group, Old Oak Interim Forum	Change proposed. Policy T8 requires development proposals to make maximum use of rail and water transport for construction deliveries.
12. Environment and Utilities, Policy EU10	Air Quality is a growing issue across London and is a cause of real local concern.	1	Midland Terrace Resident's Group	Noted. OPDC's Local Plan provides detailed policies which seek to ensure that air quality is appropriately addressed.
12. Environment and Utilities, Policy EU8	Should better reflect national and regional policies on GI	1	Natural England	No change proposed. National policy is a material planning consideration and regional policy is part of OPDC's Development Plan. It is not therefore appropriate for OPDC's Local Plan to repeat national and regional policy.

12. Environment and Utilities, Policy EU8	Should develop targets for GI in the Local Plan	1	Natural England	Change proposed. The Local Plan is now informed by the Environmental Targets Study. The Local Plan is aiming to ensure that at least 30% of the developable area is delivered as public open space and that development ensures the area is biodiversity positive.
12. Environment and Utilities, Policy EU8	Need clarity round how GI will be delivered and managed. New development should enable delivery and long term management of new and improved GI	1	Natural England	Change proposed. The Local Plan policies for open space and urban greening now require appropriate management arrangements to be put in place to monitor and safeguard the long term management of green infrastructure.
12. Environment and Utilities, Policy EU8	Clearly distinguish between planning for an increase in the area of open space and the need to plan for a functional GI network that delivers a range of social, economic and environmental benefits	1	Natural England	Change proposed. These requirements are now clearly covered in policies SP8 and EU1 and EU2.
12. Environment and Utilities, Policy EU8	Policy/justification should be clearer about the role of GI as climate adaptation measure	1	Natural England	Change proposed. This role is now more clearly recognised in the supporting text to policy SP8 and EU2.
12. Environment and Utilities, Policy EU8	Policy should also reference NPPF Paragraphs 109, 117 and 118	1	Natural England	Change proposed. As referenced in para 1.18 of the Regulation 18 draft Local Plan, the summaries of the NPPF and London Plan policy contexts have been removed from the Reg 19 Local Plan, so this comment is no longer relevant.
12. Environment and Utilities, Policy EU8	Should reference mitigation hierarchy (NPPF policy 118 and London Plan policy 7.19) for avoiding the impacts of development on biodiversity.	1	Natural England	No change proposed. The policy requirements in national policy are covered through the policies in the Local Plan. The NPPF is a material consideration and the London Plan is part of OPDC's Development

				Plan so there is not a need to directly repeat these policies.
12. Environment and Utilities, Policy EU8	Need to identify in the policy the need to address access to deficiency in access to nature	1	Natural England	Change proposed. Policy SP8 identifies the need for development to integrating with the wider green infrastructure and open space networks. Policy EU2 requires developments to deliver new urban greening and ecological improvement.
12. Environment and Utilities, Policy EU8	Need polices or further detail (e.g. through supplementary guidance or standards) on how new open space and GI will be designed for biodiversity	1	Natural England	Change proposed. Further details on the provision of new biodiversity are now included in policy EU2. This includes provision of green roofs, walls semi-mature and mature tree planting, delivering a range of climate change resilient habitats and providing roosts, nest sites and shelters for fauna.
12. Environment and Utilities, Policy EU5	The policy should refer to the recommendations in the LEDNET/LWARB Waste Management Planning Advice for New Flatted Properties study	1	North London Waste Plan	Change proposed. The waste policy now refers to the need for waste storage and collection to accord with LWARB guidance.
12. Environment and Utilities, Policy EU4	Commitment to work with its host planning authorities on waste planning matters should be incorporated into policy	1	North London Waste Plan	Change proposed. This commitment has been included in the supporting text to the waste policy.

12. Environment and Utilities, Policy EU4	Should identify waste streams for construction/demolition, low level radioactive, agricultural, hazardous and waste water waste streams.	3	North London Waste Plan, London Waste Planning Forum, City of London Corporation	Change proposed. Requirements for these waste streams are identified in OPDC's Waste Technical Paper supporting study.
12. Environment and Utilities, Policy EU1	Support Policy EU1	3	Old Oak Interim Forum, Midland Terrace Resident's Group, Old Oak Park (DP9)	Noted
12. Environment and Utilities, Policy EU7	Support Policy EU7	2	Old Oak Interim Forum, Old Oak Park (DP9)	Noted
12. Environment and Utilities, Policy EU1	The Local Plan should take into account the potential impact that zero carbon housing could have on the viability of development. The emerging policy should therefore reflect the Government's direction on zero carbon homes.	1	Old Oak Park (DP9)	Noted. The Local Plan requires developments to accord with or exceed the on-site carbon reduction targets set out in the London Plan. Where these cannot be achieved, developments must make a financial contribution in line with OPDC's carbon off-setting policy.
12. Environment and Utilities, Policy EU2	Support Policy EU2	1	Old Oak Park (DP9)	Noted.

12. Environment and Utilities, Policy EU5	Support Policy EU5	3	Old Oak Park (DP9), Surrey County Council, London Waste Planning Forum	Noted
12. Environment and Utilities, Policy EU6	Support Policy EU6	1	Old Oak Park (DP9)	Noted
12. Environment and Utilities, Policy EU8	Suggested amendments in the Preferred Policy Option highlighted as follows: a) protect and/or enhance local biodiversity, and create multi-functional green and water spaces, ensuring they are connected by street greening and other green links; c) take account of the proximity of SINCs, and the qualifying / notable features of those sites, as well as the habitat and species targets in relevant Biodiversity Action Plans (BAPs);	1	Old Oak Park (DP9)	Change proposed. OPDC has updated the open space and urban greening and biodiversity policies and their wording covers these issues.
12. Environment and Utilities, Policy EU11	It would be useful if key noise/vibration limits to be met were stated and not merely outlined as broad aims in effectively managing noise.	1	Old Oak Park (DP9)	Change proposed. The noise and vibration policy references that developments must comply with the relevant building standards.

12. Environment and Utilities, Policy EU10, Air Quality Study	Para 3.7 of the AQS should be removed as any new development will increase emissions, as they will naturally attract new users.	1	Old Oak Park (DP9)	No change proposed. The Air quality Study notes that this is only a requirement 'where possible'. It is recognised that trips will increase to the area, impacting on air quality, but this can be off-set by more efficient building design and the provision of green infrastructure
12. Environment and Utilities, Policy EU3	Concerns raised about the deliverability of area wide water management proposals, in terms of timing, viability and appetite from all developers	1	Old Oak Park (DP9)	Change proposed. The water policy sets out a sequential approach to the delivery of surface water drainage measures, recognising that strategic cross-site approaches may not be deliverable if there is not a strategic network in place that developments can connect into.
12. Environment and Utilities, Policy EU3, Integrated Water Management Strategy	The Powerday site, located in Site 3 of Old Oak Common area has an existing surface water drainage network draining the Powerday site directly to the Grand Union Canal. The IWMS, assumes the site is part of the wider Site 3 catchment draining to the TW combined sewer network. This is not the case.	1	Old Oak Park (DP9)	Change proposed. The IWMS has been updated to identify the correct catchment for this site.
12. Environment and Utilities, Policy EU3, Integrated Water Management Strategy	The ability of the local network to meet the forecast core OPDC potable demand of 2149 ML/Year has not been identified and should be a considered a key factor in streamlining the approach to an IWMS. This could require significant reinforcement or upgrade of the local TW network and potentially further upstream.	1	Old Oak Park (DP9)	Change proposed. The requirements are now set out in the Infrastructure Delivery Plan (IDP).

12. Environment and Utilities, Policy EU3, Integrated Water Management Strategy	The IWMS should remain flexible and able to be adapted in line with development proposals.	1	Old Oak Park (DP9)	Noted. The IWMS has been updated and maintains a degree of flexibility but does identify potentially inappropriate approaches to water management. It also now clarifies the proposed policy approach, which is being identified in the Local Plan's water policy.
12. Environment and Utilities, Policy EU8	OPDC's GI Strategy needs to be linked to IWMS and Public Realm, Walking and Cycling Strategy.	1	Royal Borough of Kensington and Chelsea	Noted. GI requirements are covered in the Environmental Standards Study and Sites of Importance for Nature Conservation Statement. The Local Plan draws these together to appropriately reflect their guidance
12. Environment and Utilities, Policy EU1	Should add a new bullet to the policy on exceeding mayoral targets for sustainable development and environmental performance	1	Royal Borough of Kensington and Chelsea	No change proposed. This would be inappropriate to apply to all strands of sustainable development. OPDC's Local Plan is supported by detailed evidence, which has explored the appropriate standards and policies to set for the area. Some of these do exceed and provide more specificity than the Mayoral targets, whilst for others, it is proven that the mayoral targets are sufficient.
12. Environment and Utilities, Policy EU3	In point d, there should be reference to the relevant Local Flood Risk Management Strategies adopted by the Lead Local Flood Authorities (LLFAs).	1	Royal Borough of Kensington and Chelsea	Change proposed. The revised water policy requires proposals to comply with any relevant requirements of local authority Surface Water Management Plans (SWMPs)

12. Environment and Utilities, Policy EU3	Point e should be strengthened as it is not clear if the Local Plan refers to the OPDC, the OPDC Boroughs or any other Boroughs affected by the development in the OPDC. The wording at the end of the point should be modified as follows: "(...) planned for in the Local Plans of the OPDC, and any other Boroughs impacted by the proposed development".	1	Royal Borough of Kensington and Chelsea	No change proposed. This wording is no longer relevant and has been removed in the revised Local Plan and replaced with the requirement for development to provide sufficient attenuation storage capacity to ensure the peak rate of surface water runoff generated during rainfall events up to the 1 in 100 years plus a 40% climate change allowance, does not exceed greenfield run-off rates
12. Environment and Utilities, Policy EU3	Support Option 4 but option 6 should not be dismissed.	1	Royal Borough of Kensington and Chelsea	Noted. The revised Local Plan and updated IWMS identifies a revised preferred strategy, which seeks to prioritise the delivery of strategic SUDs and greywater recycling and rainwater harvesting for non-residential developments.
12. Environment and Utilities, Policy EU3, Para 12.22	Support exceeding London Plan standards	1	Royal Borough of Kensington and Chelsea	Noted. Where feasible and viable, OPDC has sought to set targets that support this.
12. Environment and Utilities, Policy EU3, Para 12.28	In paragraph 12.28 there should also be a reference to the Council's Local Flood Risk Management Strategy as it contains a specific action regarding the OPDC (action 3b2, page 34 of the strategy).	1	Royal Borough of Kensington and Chelsea	Change proposed. The water policy requires development proposals to comply with any relevant requirements of local authority Surface Water Management Plans (SWMPs)

12. Environment and Utilities, Policy EU3, Para 12.29	In paragraph 12.29, it is not clear if there are any designated Critical Drainage Areas within the OPDC area. If so, this could clarify the locations in which Flood Risk Assessments are required.	1	Royal Borough of Kensington and Chelsea	Change proposed. These have now been included in the map for the IWMS and the map for the Local Plan.
12. Environment and Utilities, Policy EU3, Integrated Water Management Strategy	Within paragraph 1.2.1.1 bullet point 8 should read “The Royal Borough of Kensington and Chelsea”.	1	Royal Borough of Kensington and Chelsea	Change proposed. The IWMS has been amended to pick up this error.
12. Environment and Utilities, Policy EU3, Integrated Water Management Strategy	3.5 Drainage and Wastewater. Support the reference to the lack of capacity in the sewer network to accommodate additional foul flows without increasing sewer flood risk downstream.	1	Royal Borough of Kensington and Chelsea	Noted.
12. Environment and Utilities, Policy EU3, Integrated Water Management Strategy	Further detailed information should be included to understand the impact on the Counters Creek system.	1	Royal Borough of Kensington and Chelsea	Noted. Detailed information is included in the Integrated Water Management Strategy, which is a supporting study to OPDC's Local Plan.

12. Environment and Utilities, Policy EU3, Integrated Water Management Strategy	Figure 4-6 could be modified to include the pre- and post-development capacity in the sewer system by adding a new column. Another column could also be added to reflect the existing and proposed water demand infrastructure.	1	Royal Borough of Kensington and Chelsea	No change proposed. Thames Water's position is that there is no capacity in the sewer at present, therefore the increase in foul discharge must be offset with a commensurate reduction in surface water runoff which has been the focus of the IWMS aims
12. Environment and Utilities, Policy EU3, Integrated Water Management Strategy	Section 4.2 explains that the estimated peak instantaneous sewer discharge will increase about five times. It will be useful to understand how that will affect the existing capacity of the sewers in terms of percentage.	1	Royal Borough of Kensington and Chelsea	No change proposed. Sewer network modelling would be required to achieve this which was not part of the IWMS - the study has demonstrated how surface water runoff could be effectively managed to significant reduce the instantaneous discharge rate to sewer during rainfall events up to the 1 in 100 year event with an allowance for climate change
12. Environment and Utilities, Policy EU3, DIFS	Paragraph 17.7 (page 122) seems to imply that the surface water discharge into the Canal will only be explored after a separated surface water system is in place. Although it is understood that there may be issues to overcome regarding the discharge into the canal, this option should be considered from the beginning to ensure maximisation of opportunities.	1	Royal Borough of Kensington and Chelsea	Change proposed. The IWMS supersedes the DIFS. Discharge into the Grand Union Canal is part of the proposed policy approach in the IWMS and in the Local Plan water policy (EU3).

12. Environment and Utilities, Policy EU3, DIFS	Paragraph 17.12 (page 123) needs amending to make clear that the Counters Creek sewer is already in place. The project that Thames Water is currently developing is the Counters Creek Storm Relief Sewer so the reference should be corrected.	1	Royal Borough of Kensington and Chelsea	No change proposed. The DIFS was undertaken in 2015 and is now superseded by the IWMS, which clarifies the arrangements for Counters Creek
12. Environment and Utilities, Policy EU3, DIFS	Para 17.12: the information provided could be expanded to explain that the potential creation of capacity in the main sewer as a result of the proposed storm relief sewer will be needed due to the forecast increased in foul water entering the system.	1	Royal Borough of Kensington and Chelsea	No change proposed. The DIFS was undertaken in 2015 and is now superseded by the IWMS, which provides further detail on the arrangements for capacity creation.
12. Environment and Utilities, Policy EU3, DIFS	Paragraph 17.15 (page 121). There should also be a reference to the proposed Counters Creek Flood Alleviation Scheme.	1	Royal Borough of Kensington and Chelsea	No change proposed. The DIFS was undertaken in 2015 and has been superseded by the IWMS. The IWMS references the Counters Creek Flood Alleviation Scheme
12. Environment and Utilities, Policy EU3, DIFS	Paragraph 17.25 (recommendations, page 126): the 4th bullet point should be removed as it explains that if negotiations with the Canal and River Trust fail, then Counters Creek could be considered as an alternative. This contradicts what it is said in paragraph 17.12.	1	Royal Borough of Kensington and Chelsea	No change proposed. This has now been superseded by the IWMS, which clarifies the updated position in respect of Counters Creek and alternative provision.

12. Environment and Utilities, Policy EU4, Waste Strategy	Paragraph 8.102 of the London Borough of Hammersmith and Fulham's adopted Core Strategy states "Spare waste management capacity of up to 220,000 tonnes has been identified within Hammersmith and Fulham. This spare capacity could accommodate the needs of the Royal Borough of Kensington and Chelsea and be utilised for that purpose". This arrangement should be acknowledged in the Waste Strategy and Local Plan.	1	Royal Borough of Kensington and Chelsea	No change proposed. This wording is not included in the LBHF submission draft Local Plan. OPDC's Local Plan recognises that OPDC does not have an apportionment target. Any arrangement to provide any spare apportionment capacity to RBKC would need formal agreement of LBHF and this is therefore beyond the scope of this Local Plan.
12. Environment and Utilities, Policy EU4, Waste Strategy	The Waste Strategy needs to acknowledge and consider the WRWA Waste Apportions Engagement Statement	1	Royal Borough of Kensington and Chelsea	No change proposed. The engagement statement has now been superseded by the Waste Technical Paper, which is a supporting study to OPDC's Local Plan.
12. Environment and Utilities, Policy EU4	There should be a reference in the policy to the possibility of increasing and maximising the capacity of the safeguarded sites. This could be linked to paragraph 12.54, under EU5 (Circular economy and resource efficiency).	1	Royal Borough of Kensington and Chelsea	Change proposed. The waste policy identifies that applications for new or enhancements to existing waste facilities will be supported where they would help reduce CO2 emissions and increase operational capacity and waste recovery rates
12. Environment and Utilities, Policy EU8	There could be a reference to all green SuDS (rather than just green roofs) under paragraph 12.79.	1	Royal Borough of Kensington and Chelsea	Change proposed. The definition of green infrastructure has been expanded in the supporting text to Policy SP8.

12. Environment and Utilities, Policy EU9	Should include a map identifying areas in which mineral extraction would not be permitted due to a negative impact on flood risk defences or other issues	1	Royal Borough of Kensington and Chelsea	No change proposed. OPDC considers that applications should be considered on a case by case basis and that the criteria in the policy should be used for assessing the acceptability or otherwise of proposals. This includes potential impacts on water courses.
12. Environment and Utilities, Policy EU6	The Local Plan should recognise that there are existing power contraints in Park Royal and that new development should not further exacerbate this.	1	Segro	Change proposed. The Local Plan requires major proposals to provide evidence of discussions with service providers in particular power to demonstrate that there is capacity in the network to facilitate delivery of their development within the time of their planning permission.
12. Environment and Utilities, Policy EU7	Broadband connectivity is critical to the success of many of Park Royal's commercial occupiers.	1	Segro	Noted. OPDC's smart technology policy supports and appropriately secures the delivery of high speed wired and wireless broad band technologies that provide a wide range of services.
12. Environment and Utilities, Policy EU4	Should safeguard all waste sites in Old Oak and circumstances are likely to change and result in increased arisings, sites with permission not being delivered and other unknown factors	1	Surrey County Council	Change proposed. In accordance with London Plan Policy 5.17H, the Local Plan requires developers to ensure waste management site(s) which are lost to a non-waste use will be required to provide compensatory site provision which normally meets the maximum throughput that the site could achieve and supports its relocation to a suitable site in the following sequential manner: • within the borough where the site is located; • within the West London Waste Authority and Western Riverside Planning Authority areas; or • within Greater London

12. Environment and Utilities, Policy EU4	New sites should be identified to relocate lost waste sites	1	Surrey County Council	No change proposed. OPDC does not want to commit to re-allocating specific sites for waste management facilities at this stage as there will be a need to work with the waste operator to consider appropriate sites at the time the site is brought forward for redevelopment. A sequential process has been outlined for reallocating sites: • within the borough where the site is located; • within the West London Waste Authority and Western Riverside Planning Authority areas; or • within Greater London
12. Environment and Utilities, Policy EU3	It is imperative that the recommendations of the IWMS are secured and delivered to ensure that adequate water and wastewater infrastructure capacity is provided for the level of growth proposed. As	1	Thames Water	Change proposed. The recommendations from the revised IWMS have been appropriately embedded into the water policy and other relevant policies in the Local Plan.
12. Environment and Utilities, Policy EU3	Need to ensure attenuation measures are in place in early development phases and that mitigation addresses Wormwood Scrubs flooding issues	1	The Hammersmith Society	Noted. The need for strategic surface water drainage to address current flooding issues on Wormwood Scrubs is identified in the Wormwood Scrubs place policy
12. Environment and Utilities, Policy EU8	Support Policy EU8	3	The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group, 1 Resident	Noted.

12. Environment and Utilities, Policy EU10	Local Plan should be clearer as to who the air quality controlling and monitoring bodies are.	1	The Hammersmith Society	Noted. DEFRA are the principle air quality monitoring body. The boroughs have responsibility for the production of Air Quality Action Plans, but the supporting text to the revised local plan highlights that OPDC will work closely with the local authorities to ensure that future iterations of AQAPs are aligned for the OPDC area and that the adequately reflect OPDC's aspirations for the area to achieve high standards of air quality
12. Environment and Utilities, Policy EU12	OPDC should undertake a comprehensive assessment of the potential extent of land contamination	1	The Hammersmith Society	No change proposed. This assessment of land contamination should be undertaken by developers of specific sites. However, the appendix to OPDC's Development Infrastructure Funding Study provides a high level summary of the likely contamination of development sites in Old Oak.
12. Environment and Utilities, Policy EU4	Waste sites should be built away from local housing	2	Wells House Road Residents Association, 1 resident	Noted. Proposals for new waste facilities would need to accord with the waste policy, which requires facilities to be fully enclosed and adequately mitigate their impact on amenity, air quality, noise, the transport network and other environmental considerations
12. Environment and Utilities, Policy EU1	Greenhouse gas emissions, waste reduction and recycling, green infrastructure, water management, circular economy could have been included in targets.	1	WRc	Change proposed. The Local Plan now includes clearer policies for the delivery of high standards of carbon emission reductions, recycling and circular economy principles, green infrastructure, water management and the sustainable use of materials.

12. Environment and Utilities, Policy EU2	There needs to be a precursor policy option that specifies a minimum level of infrastructure, with related target; for example, minimum broadband speed and mobile phone connectivity, or a requirement to ensure free Wi-Fi across the area, such as is available in the centre of Cardiff	1	WRc	No change proposed. The smart technology policy (EU11) requires the provision of high speed wired and wireless broad band technologies that provide a wide range of services. A specific target for this would quickly become obsolete, so would be inappropriate for inclusion in a 20 year Local Plan. The appropriateness of broadband speed would be assessed relative to standards at the time of the application.
12. Environment and Utilities, Policy EU2, QEU2b	Requirements for providing open and interoperable data should not be stronger as technology changes so quickly that making stronger or more specific requirements would be a barrier to innovation.	1	WRc	No change proposed. The wording in the smart technology is considered to be strong enough to secure appropriate provision of smart city systems that provide interoperable, open and usable data
12. Environment and Utilities, Policy EU3	The assumption made is that the foul water will be going into the existing sewer network, which therefore leads to a number of boundaries being set about the service that can be provided. No consideration is given about creating any new infrastructure, or the potential for that new infrastructure to be part of the energy generation or waste solution. By taking a circular economy strategic approach, more innovative, cost-effective, collaborative solutions may appear.	1	WRc	Change proposed. The Local Plan provides many details about the need for new infrastructure and the need for new energy and waste infrastructure is part of this.

12. Environment and Utilities, Policy EU4	there is no mention made about the ambition for service provision to the households and businesses that will be within the OPDC area, either in terms of targets for reuse and recycling, or a reduction in the level of waste produced per capita, for example.	1	WRc	Change proposed. The Local Plan recognises the London Plan targets for waste re-use and recycling in the supporting text to the waste policy. The policy itself requires developers to
12. Environment and Utilities, Policy EU6	Support for use of energy from waste	3	WRc, 2 residents	Noted.
12. Environment and Utilities, Policy EU5	The links between planning of resource management infrastructure, other utilities and energy generation are not made explicit.	1	WRc	Change proposed. The synergies between interdependent issues have now been drawn out more in the strategic policies, specifically policies SP2 and SP10.
12. Environment and Utilities, Policy EU5	The circular economy section sohuld reference flexible uses of space witin a 24 hour cycle or beyond and should reference acounting for different modes of transport	1	WRc	Change proposed. The circular economy policy has been broadened out to cover both the circular and sharing economy and the supporting text identifies that flexible/communal use of space should be considered as part of an approach to the circular and sharing economy.
12. Environment and Utilities, Policy EU5	Should provide space in buildings for storage of materials and shared products to help promote a circular economy	1	WRc	change proposed. This potential is referenced in the supporting text to Policy EU7 (circular and sharing economy)

12. Environment and Utilities, Policy EU6	The section on decentralised energy assumes that energy can mainly be generated in energy centres rather than seeing the opportunities for energy generation in the infrastructure that is being developed	1	WRc	Change proposed. The energy systems policy has been broadened out to idenify other alternative sources of energy and heat generation.
12. Environment and Utilities, Policy EU6	Section needs to reference importance of heat as part of energy supply	1	WRc	Change proposed. The energy systems policy and supporting text note the importance of heat as part of energy infrastructure provision.
12. Environment and Utilities, Policy EU8	Green infrastructure should be incorporated in utilities and transport planning	1	WRc	Change proposed. Policy EU1 and EU2 note the importance of delivering green streets and street greening as part of the green infrastructure network. Many of the areas rail corridors are also identified as SINCs.
12. Environment and Utilities, Policy EU8	Environmental sustainability and particularly policy EU8 need cross referencing in the housing chapter	2	WRc, 1 resident	No change proposed. It is not clear why this needs to be cross-referenced.
12. Environment and Utilities, Policy EU11	There are noises from electricity infrastructure in the OPDC area and the development needs to help to mitigate this	1	Resident	Noted. New energy infrastructure provision would need to accord with the standards outlined in Policy EU5.
12. Environment and Utilities, Policy EU4	do not support/concern raised about the safeguarding of Powerday waste site	5	Harlesden Neighbourhood Forum, Midland Terrace Resident's Group, TITRA, 2 residents	No change proposed. The rationale for safeguarding Powerday (Old Oak Sidings) is outlined in the Waste Apportionment Study supporting evidence paper. It is required for safeguarding for apportionment to ensure that LBHF can meet its apportionment targets. This is a requirement of para 5.80 of the London Plan.

12. Environment and Utilities, Policy EU10	The Air Quality Study does not take sufficient account of the waste site/HGV and particulate problem. Air quality measures are required around Old Oak Lane.	2	TITRA, Resident	No change proposed. The Air Quality Study does take account of these and Old Oak Lane is identified as an air quality focus area.
12. Environment and Utilities, Policy EU10	There should be real time air quality monitoring across OPDC area so you understand the poor air quality hotspots and the sources	1	Resident	Change proposed. The air quality policy seeks to secure contributions towards and/or the delivery of air quality monitoring stations. These would be connected to DEFRA's Automatic Urban and Rural Network (AURN) quality control standards and made publicly available
12. Environment and Utilities	Should have a policy promoting an integrated approach to utilities provision	1	Resident	Change proposed. An integrated and strategic approach to utilities provision is promoted in Policy SP10 and in relevant policies in the Environment and Utilities chapter.
12. Environment and Utilities, Smart Strategy	Support draft Smart Strategy	1	Resident	Noted.
12. Environment and Utilities, Policy EU7	Need to future-proof digital services provision	2	Residents	Change proposed. Policy EU11 (smart technology) has been updated to require that development proposals ensure that any smart city technologies and approaches can be updated over time to respond to innovation
12. Environment and Utilities, Policy EU6	Need a policy to promote energy reductions/efficiency	1	Business	Change proposed. Policy EU9 deals with this.
12. Environment and Utilities, Policy EU8	Need to include a policy that promotes wildlife	5	5 Residents	No change proposed. Policy EU8 dealt with this in the Reg 18 Local Plan. The Reg 19 Local Plan deals with this in Policy SP8 and Policy EU1 and EU2.

12. Environment and Utilities, Policy EU4	There are issues with fly tipping in the area that need to be addressed	1	Resident	Noted. Policy EU6 (waste) requires developments to provide appropriate waste storage and collection within developments. Fly tipping beyond that generated through new development is beyond the scope of the Local Plan and is the responsibility of the waste authorities and local authorities.
12. Environment and Utilities, Policy EU3	Too many front gardens are being concreted over and this is bad for drainage	1	Resident	Noted. Concreting over front gardens can be done through permitted development.
12. Environment and Utilities, Policy EU3	Need to distinguish between what is required for surface water flooding and other drainage	1	Resident	Change proposed. This is now clearly distinguished in the water policy.
12. Environment and Utilities, Policy EU3	Need to consider use of rain gardens	1	Resident	Change proposed. The potential for rain gardens to form part of the green infrastructure network, contribute to biodiversity and urban greening and help address surface water drainage are referenced in the supporting text to Policy SP8, EU2 and EU3.
12. Environment and Utilities, Policy EU11	Particular consideration needs to be given to construction noise	2	Residents	Change proposed. Policy EU5 (noise and vibration) references the importance of appropriately mitigating noise and vibration impacts, both during and post construction.
12. Environment and Utilities, Policy EU6	District heating systems can be inefficient if not accompanied by an adequate control system	1	Resident	Noted. The energy systems policy (EU10) requires that developments accord with the specification requirements in OPDC's Infrastructure Delivery Plan to avoid this.
12. Environment and Utilities, Policy EU5	Should recycle materials for constructing buildings	1	Resident	Change proposed. Local Plan Policy EU8 (sustainable materials) supports the use of reused and recycled content.

12. Environment and Utilities, Policy EU3	Should try to look to re-open covered rivers in the area, such as Counter's Creek	1	Resident	No change proposed. Counters Creek is a sewer and in storm events is used for blackwater. It would be inappropriate to uncover it for environmental health reasons. The Grand Union Canal Place policy supports an increase in the canal's water space and Policy SP8 also promotes 'blue' infrastructure provision as part of green infrastructure provision.
12. Environment and Utilities, Policy EU3	Support for above ground water attenuation on Wormwood Scrubs	1	Resident	Noted.
12. Environment and Utilities, Policy EU3	Should dredge and restore rivers as this will help with flooding issues	1	Resident	Noted. The only river within the OPDC area is the River Brent. Dredging needs fall outside of the remit of this Local Plan.
12. Environment and Utilities, Policy EU3	The area will require additional sewerage infrastructure to meet demands	1	Resident	Noted. This requirement is covered in the water policy.
12. Environment and Utilities, Policy EU8	Should use railway embankments as biodiversity corridors	1	Resident	Noted. Many of the areas railway embankments are already identified as SINCs and policy EU2 looks to conserve and enhance these spaces. Proposals that would result in a measurable loss of biodiversity will only be permitted where either an equivalent or greater amount of biodiversity is provided on-site, or where this is not feasible, OPDC will secure a financial contribution to facilitate off-site enhancements in lieu of provision

12. Environment and Utilities, Policy EU4	Should have a policy requiring commercial companies to use the same waste disposal company to ease congestion	1	Resident	No change proposed. This is beyond the scope of planning policy, but Policy EU6 does require developments to make adequate provision for waste storage and collection within developments, demonstrate a collaborative approach with the Waste Authorities and OPDC is being adopted to help deliver strategic waste management systems in order to meet national and London waste recycling targets and work with waste authorities to ensure waste collection approaches align with current and future waste collection arrangements
12. Environment and Utilities, Policy EU8	Need to put in place controls to ensure that developers deliver the number, size and species of trees they show in their visualisations	1	Resident	Change proposed. Policy D1 (securing high quality design) requires development proposals to commit to using mechanisms to secure delivery of design quality, as stated in submission materials documents, in the detailed design and construction of development, where these materials elements are not approved on the grant of planning permission
12. Environment and Utilities, Policy EU8	Need to reference air quality benefits of trees	1	Resident	No change proposed. The benefits of green infrastructure to air quality have been referenced. It is therefore not considered necessary to specifically identify the benefits of trees to air quality.
12. Environment and Utilities, Policy EU9	Object to any fracking within the OPDC area	1	Resident	No change proposed. The NPPF requires local planning authorities to plan positively for mineral extraction. OPDC's policy supports mineral extraction but identifies a series of criteria that must be met for mineral extraction to be considered acceptable.

12. Environment and Utilities, Policy EU6	Should investigate the potential for generating energy from an anaerobic digester	2	Resident, London Waste Planning Forum	Change proposed. Policy EU6 requires proposals for new or enhanced waste facilities to, if relevant and appropriate, deliver anaerobic digestion and / or other bio-waste treatment and additional recycling facilities particularly to support greater levels of recovery in accordance with the waste hierarchy
12. Environment and Utilities, Policy EU1	Need to set out how carbon emissions will be minimised	1	Resident	Change proposed. This is covered specifically in Policy EU9 but carbon reductions cut across a number of other policy areas and are supported by measures such as supporting sustainable travel modes (SP7), delivering open space and urban greening (EU1 and EU2) and minimising waste (EU6)
12. Environment and Utilities, Policy EU2	Need to be clearer how smart /digital data can drive improvements and change behaviours	1	London Sustainable Development Commission	Change proposed. Further clarity on the ways that smart technology can improve and change behaviour are included in the smart technology policy.
12. Environment and Utilities, Policy EU3	Suggest that the good water ideas currently presented should be integrated with approaches to energy and waste in a system of systems approach.	1	London Sustainable Development Commission	Change proposed. Policy SP10 recognises the importance of coordinated and integrated delivery to infrastructure and especially utilities infrastructure. Other development management policies also draw this out more, such as the waste policy and energy systems policies identifying the potential for energy from waste and the potential as part of this for heat capture.

12. Environment and Utilities	Understand why EU4 and EU5 have been given separate sections but suggest that a Resources Management chapter would bring both waste management (EU4) and resource efficiency together and aid integration	1	London Sustainable Development Commission	No change proposed. There is a need to have separate policies or the policies could become unnecessarily lengthy, convoluted and confusing.
12. Environment and Utilities, Policy EU5	Need to be much more clear about how circular economy principles can be embedded in development in both Old Oak and Park Royal	2	London Sustainable Development Commission WRc	Change proposed. Details are provided in the supporting text to the circular and sharing economy policy EU7. This is further supported by the Circular and Sharing Economy Strategy, which is a supporting study to the Local Plan.
12. Environment and Utilities, Policy EU6	OPDC should develop a sustainable energy strategy, that looks more broadly than just district heating	1	London Sustainable Development Commission	No change proposed. The updated energy systems policy (EU10)
12. Environment and Utilities, Policy EU6	Transport infrastructure planned for the area provides an opportunity to address heat / cooling in an integrated way.	1	London Sustainable Development Commission	Noted. The local Plan supports an integrated and coordinated approach, in accordance with Policy SP10.
12. Environment and Utilities, Policy EU10	Would like to see OPDC pushing the boundaries and the creation of a zero-emissions zone	1	London Sustainable Development Commission	Noted. The supporting text to the air quality section notes that OPDC are in discussions with TfL regarding the potential for a zero-emissions zone in the area. Any identification of a zero emissions zone would need to undergo public consultation and any standards would most likely be dealt with through a supplementary planning document.

12. Environment and Utilities	the chapter is not ambitious or long term enough. The development won't be realised or built out fully until 2030 and once it is it will be completely transformed. The vision needs to recognise this and focus on the long term outcomes.	1	London Sustainable Development Commission	No change proposed. The plan needs to be applicable to proposals coming forward immediately. The plan cannot and should not set standards for 20 years in the future as this would most likely stifle development from coming forward.
12. Environment and Utilities	Chapter is not holistic. Different sections need to be clearly linked and inter-connections recognised.	1	London Sustainable Development Commission	Change proposed. The revised Local Plan has a section next to each policy identifying policy links.
12. Environment and Utilities	the chapter needs a clear funding and delivery strategy	1	London Sustainable Development Commission	No change proposed. Funding and delivery is dealt with in the Delivery and Implementation chapter.
12. Environment and Utilities	the chapter needs to be positioned alongside other chapters and aspirations, for example the aspiration to create a mixed use and affordable new district	1	London Sustainable Development Commission	Change proposed. The interdependencies between policies has been recognised, as much as it can be without constantly repeating itself, within the strategic policies and chapter introductions. Each policy also now has a policy links section highlighting which other policies the policy should be read in conjunction with.
12. Environment and Utilities	Transport is a key element of the strategy but it is not included in the chapter.	1	London Sustainable Development Commission	No change proposed. Transport is dealt with in the transport chapter. The introduction to the environment and utilities chapter cross-references the transport chapter, where appropriate.

12. Environment and Utilities	The chapter has too much emphasis on developers and not enough on the strategic approaches that are required by the Development Corporation, statutory providers, national government, developers and others to achieve the objectives.	1	London Sustainable Development Commission	No change proposed. The Local Plan is predominantly used for the assessment of development proposals. The plan does also set out OPDC's approaches to certain aspects of planning and sets out the key vision for the area, but the Plan's predominant use is in the assessment of planning applications and it needs to be able to function for this purpose.
12. Environment and Utilities, Policy EU2	The policy should describe how data will be used to set up a district hub that uses the data to support efficient use of resources, support low carbon behaviours, balance supply and demand management etc.	1	London Sustainable Development Commission	No change proposed. The requirements for the provision of data are set out in the Smart policy (EU11) and are appropriately referenced, where appropriate, in other planning policies relating to the environment, utilities, design and transport.
12. Environment and Utilities, Policy EU3	The strong connections with other strategies including the green and blue infrastructure strategy, climate resilience strategies; clean air strategy, low carbon strategies etc. should be made and a system wide approach taken into which individual developments are linked.	1	London Sustainable Development Commission	Change proposed. The interdependencies between policies have now been drawn out more through the inclusion of more cross-cutting strategic policies, through the insertion of introductions to each of the thematic chapters and through the introduction of policy links sections next to each policy.
12. Environment and Utilities, Policy EU4	Would welcome the inclusion of a proposal around materials and waste from demolition, which is not currently part of the policy option, yet will be a major cause of waste and potential source of materials over the lifetime of the development.	1	London Sustainable Development Commission	Change proposed. Appropriate minimisation of waste during demolition and construction is dealt with through policies EU6 (waste), EU7 (Circular and Sharing Economy) and EU8 (Sustainable Materials).

12. Environment and Utilities, Policy EU1	Protection of light rights for installation of solar PV and hot water should be reviewed and wider provision for low carbon technology should be planned in.	1	London Sustainable Development Commission	Change proposed. Policy SP10 recognises the importance of development on one site not unduly restricting development on an adjacent site. Rights to light are a separate legal consideration.
12. Environment and Utilities, Policy EU8	Policy should be much stronger in relation to enhancing the quality of existing facilities.	1	London Sustainable Development Commission	Change proposed. The Local Plan is accompanied by more detailed evidence on the need of otherwise to enhance existing facilities versus the need for on-site delivery of facilities.
12. Environment and Utilities, Policy EU8	A hierarchy of accessible green spaces should be created to serve community needs.	1	London Sustainable Development Commission	Change proposed. The revised Local Plan sets out a public open space hierarchy and the requirement for development to support the attainment of 30% of the developable area as public open space.
12. Environment and Utilities, Policy EU8	The connections with other strategies should be drawn out more clearly in the policy, including water, energy, climate mitigation and urban heat island effects, health, air and noise quality, flooding etc.	1	London Sustainable Development Commission	Change proposed. The interdependencies between policies have now been drawn out more through the inclusion of more cross-cutting strategic policies, through the insertion of introductions to each of the thematic chapters and through the introduction of a policy links section associated with each policy.
12. Environment and Utilities, Policy EU8	A strategic Biodiversity Action Plan (BAP) for the whole site should be produced.	1	London Sustainable Development Commission	No change proposed. OPDC's Environmental Standards Study and OPDC's SINC Statement provide evidence for OPDC's approach to urban greening and biodiversity. OPDC is proposing to produce an Environmental Standards SPD following the adoption of the Local Plan and this may also include a Biodiversity Action Plan.

12. Environment and Utilities, Policy EU6	The long term users of the system, the community should also potentially be given a stake in a community energy or low carbon management company.	1	London Sustainable Development Commission	Noted. This is not something that the Local Plan should require, but Policy DI3 supports the community ownership of assets, which could include a community energy or low carbon management company.
12. Environment and Utilities, Policy EU4	Want to see continuing commitment to work with Western Riverside, WL Boroughs reflected in Plan to take account of future reviews of the London Plan	1	London Waste Planning Forum	Change proposed. The supporting text to the waste policy (EU6) refers to the ongoing and continual work between OPDC and the Western Riverside Waste Authority boroughs and West London Waste Authority boroughs.
12. Environment and Utilities, Policy EU4	Need to set out criteria for how new applications for waste sites would be assessed	1	London Waste Planning Forum	Change proposed. The revised waste policy (EU6) includes criteria for the assessment of new or enhanced waste sites.
12. Environment and Utilities, Policy EU4	The Plan should reference other waste plan areas in London as part of the proposed areas of search for replacement provision to try to avoid waste uses leaving London altogether.	1	London Waste Planning Forum	Change proposed. The revised waste plan sets out a sequential approach to the compensatory provision of throughput from any lost waste management site. This prioritises the borough where the site is located, following by the OPDC's local waste authority areas.
12. Environment and Utilities, Policy EU4	There are potential DtC implications due to relationship with other authorities to whom the HS2 excavated waste might be sent.	1	London Waste Planning Forum	Noted. In accordance with the duty to cooperate, OPDC has been working with the West London Waste Authority boroughs and Western Riverside Waste authority boroughs, the wider London boroughs as part of the London Waste Planning Forum and contacted boroughs receiving or sending waste to sites in the OPDC area as part of the Regulation 18 (and Regulation 19) consultations.

12. Environment and Utilities, Policy EU10, Air Quality Study	The AQ study proposes an Air Quality Focus Area north of Willesden Junction Station including part of residential Harlesden. We support this but it must be extended the short distance south to include our residential neighbourhood - the Old Oak Lane Conservation Area. Extending the scope to include other residential areas should also be considered.	1	TITRA	No change proposed. Old Oak Lane is identified as an air quality focus area and continues to be identified as an air quality focus area.
12. Environment and Utilities, Policy EU4	Should require that development adequately mitigates itself against the impacts of the retained Powerday waste site	1	Harlesden Neighbourhood Forum	Change proposed. OPDC's Local Plan recognises the 'agent of change' principles and the need for new development to appropriately mitigate against the impacts arising from existing uses, particularly relating to air and noise pollution.

13. Delivery and Implementation

Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
Delivery and Implementation Chapter, figure 138	Development phasing - Scrubs Lane West to be developed in first five years We therefore suggest that Figure 77 (and Figure 138) is amended to identify both 104-106 and 108 Scrubs Lane as sites that can come forward in the first delivery phase (2017-2021) rather than the second (2022-2037).	1	Quod (on behalf of private land owner)	Change proposed. The phasing for these sites has been updated in the Local Plan.
Delivery and Implementation Chapter, Paragraph 1.1 and Section 4 DCS	Development capacity and phasing - potential for greater capacity and earlier delivery than currently stated in DCS	1	Montagu Evans (on behalf of private land owner)	Change proposed. We have considered all comments and this has resulted in creating greater capacity and earlier delivery in the Local Plan with the DCS being updated accordingly.
Delivery and Implementation Chapter, Figure 138	Development on First Central should be identified within an earlier development phase shown on figure 138	1	LB Brent	Change proposed. The phasing for these sites has been updated in the Local Plan.

Table 16 Local Plan	Should cross-reference Table 16 on pages 340 to 345.	1	LB Brent	Noted. This comment is no longer relevant in The Regulation 19 Local Plan. The infrastructure list is included in a separate Infrastructure Delivry Plan.
Para 13.11 Local Plan	Amend text in paragraph 13.11 to say 'would not' instead of 'may not'	1	LB Brent	No change proposed. As a result of editing, thiss comment is not relevant to the Regulation 19 Local Plan
DiFs	Willesden Junction station upgrades should be identified as being of critical priority	1	LB Brent	Noted. The delivery of upgrades to Willesden Junction station is recognised as a key piece of infrastructure within the Willesden Junction place policy.
DiFs	Should identify that Willesden Junction station upgrades require delivery in advance of Old Oak Common station upgrades	1	LB Brent	No change proposed. The exact phasing for the delivery of the station will be dependent on when development comes forward. The Infrastructure Delivery Plan gives an indication of the likely phase for the delivery of the facility.
DiFs/ Local Plan (T16 in Table 16)	Brent Council also strongly supports the Crossrail West Coast Mainline link.	1	LB Brent	Noted
Table 16 Local Plan	Add infrastructure items for use of the Grand Union Canal	1	LB Brent	No change proposed. Supporting the Increased the use of the Grand Union Canal is not a piece of infrastructure.

Figure 141 (Local Plan - Social Infrastructure)	Figure 141 should differentiate between existing and needed infrastructure	1	LB Brent	Change proposed. The introduction chapter identifies existing facilities in the area. The Infrastructure Delivery Plan identifies existing facilities that will be expanded and requirements for new on-site facilities.
Table 16 (Local Plan)	Phasing should be broken down further(table 16)	1	LB Brent	Change proposed. The next version of the Local Plan includes a revised and refined phasing 0-5; 6-10; 11-20; 20+
Table 16 (Local Plan)	T4 & T5 - need to define if connection is vehicular and/or pedestrian. (table 16)	1	LB Brent	Change proposed. The Infrastructure Delivery Plan (IDP) provides information about these connections.
Table 16	Need to identify wider public realm enhancements	1	LB Brent	Change proposed. Further studies have been undertaken for the Reg19 Local Plan to identify further enhancements for the public realm and these have been incorporated into the Local Plan and the Infrastructure Delivery Plan (IDP).
Table 16 (Local Plan)	T12 - on figure 140 does not correlate with Scrubs Lane. Error (table 16)	2	LB Brent	noted. The infrastructure items and maps have been updated and included in the Infrastructure Delivery Plan (IDP).
Table 16	Include public cycling facilities (table 16)	1	LB Brent	Change proposed. Cycling facilities have been added to the Infrastructure Delivery Plan (IDP).
Table 16	there is no capacity to expand existing schools (table 16)	1	LB Brent	An Education and Health Study has been undertaken for the Reg 19 version of the draft Local Plan and addresses these concerns. This shows that there are sites school sites outside the OPDC area that can be expanded

Table 16	It may not be possible to expand emergency service facilities	1	LB Brent	No change proposed. The DIFS was produced in consultation with Emergency Services and identified the possibility of expanding the police and ambulance stations in the area.
Table 16	Need to include items from Park Royal Transport Strategy (table 16)	1	LB Brent	Change proposed. The Infrastructure Delivery Plan (IDP) now identifies a series of transport interventions in Park Royal
Table 16	Need to monitor impacts on surrounding communities (table 16)	1	LB Brent	Noted. OPDC has prepared a report on the socio-economic baseline and the Local Plan includes indicators to measure change related to this over time.
Table 16	Should consider S106 funding for canal related works (table 16)	1	CRT	Noted. Funding for canal related infrastructure will be sought through s106 if it is appropriate to do so.
Chapter 13	Flexibility - build in flexibility in to the plan reflecting long term development period	1	Canary Wharf Group PLC	Noted. OPDC considers that flexibility has been built into the Plan to reflect the development timeframe.
Chapter 13 QDIa	Highest priority pieces of infrastructure are: all the road, pedestrian and cycle connections, The two new Overground stations, schools and health centres, interim community facilities, and identified socio-economic infrastructure.	1	Diocese of London	Noted. In accordance with Policy SP10 and DI2, OPDC will secure appropriate contributions from developments towards the delivery of relevant infrastructure.
Chapter 13 QDIb	All of the infrastructure is considered high priority or necessary.	1	Diocese of London	Noted. In accordance with Policy SP10 and DI2, OPDC will secure appropriate contributions from developments towards the delivery of relevant infrastructure.

Chapter 13 QDId	Community hubs SI17 and SI18 appear to be in the wrong phases - Old Oak North hub will be needed before Old Oak South.	1	Diocese of London	Change proposed. Assumptions around phasing have been updated and included in the Infrastructure Delivery Plan (IDP)
Chapter 13 QDIe & QDIf	key items of infrastructure from table 16, socio-economic targets and standards from Socio Economic Strategy, and output/outcome based targets should be monitored (e.g. affordable and special needs housing for ownership and rent, employment, training and educational achievement).	1	Diocese of London	Change proposed. OPDC's KPIs monitor socio-economic targets. There are also KPIs dealing with housing delivery. Educational attainment is not directly relatable to the policies in the Local Plan, so it is not proposed that this is monitored through the Local Plan. The Local Education Authorities do monitor this.
Chapter 13 QDIe	Should monitor biodiversity	1	GiGL	Change proposed. The Local Plan includes a KPI on loss of biodiversity.
Table 16	Add the need for additional capacity on the North & West London Lines to Table 16	1	GLA, TfL	No change proposed. Proposals for the increase in capacity of the North and West London Lines would be a strategic issue and would need to be dealt with through alternative funding arrangements, such as grant funding and/or Mayoral CIl
Table 16	Add Mitre Road Bridge and Scrubs Lane expansion/road widening to facilitate improved cycle lane and pedestrian facilities in the area	1	GLA	Change proposed. Scrubs Lane improvements are covered in the Infrastructure Delivery Plan (IDP).

Figure 140	Figures 140 & 105 are not consistent in their depictions of Junction Improvements	1	GLA	Change proposed, the Infrastructure Delivery Plan (IDP) figures have been corrected and are consistent.
Paragraph 13.31	Clarify there is only one Crossrail depot and that any de-designation would be subject to standard rail industry procedures and consultation	1	GLA	Noted. The Local Plan now clarifies there is one Crossrail Depot.
Chapter13	Different options need to be considered as scale of development and expensive infrastructure requirements may be unrealistic.	1	GUA	No change proposed. OPDC's Local Plan sets out the preferred regeneration strategy for the area. Where there is greater certainty, the plan is more specific. This applies to locations such as Scrubs Lane, where sites are likely to come forward early and there is greater certainty regarding the policy approach to these sites. Conversely, the Local Plan deals with sites within later development sites in a more flexible way. To address the need for flexibility in infrastructure, OPDC's Local Plan is supported by an Infrastructure Delivery Plan (IDP), which will be a 'live' document that can be readily amended to address changes in infrastructure requirements.
Chapter 13 - funding section	Borrowing against future CIL and S106 income streams, or against uplift in business rates places a large burden on public bodies and is risky.	1	GUA	Noted. The revised Delivery and Implementation chapter now provides greater detail on the funding and financing options available for the delivery of infrastructure.
Chapter 13 - funding section	This section does not fully disclose the issues concerning funding needs raised in the DIFS. Major developments should be provided by public bodies and providers who will ultimately recoup their expenditure and benefit from their operation and taxation.	1	GUA	Noted. The revised Delivery and Implementation chapter now provides greater detail on the funding and financing options available for the delivery of infrastructure. This includes the potential for grant funding from public bodies.

Table 16	T18 is controversial in terms of preserving the character and use of Wormwood Scrubs, and the need for such access needs to be stringently reviewed.	1	GUA	No change proposed. The Wormwood Scrubs Act (1879) states that Wormwood Scrubs should be held “upon trust for the perpetual use thereof of the inhabitants of the metropolis for exercise and recreation”. Providing access to the Scrubs for the new residents, employees and visitors within Old Oak accords with the Act; however, any access would need to be sensitively designed to minimise its impact on the ecological value of the Scrubs and would need full agreement from the Wormwood Scrubs Charitable Trust.
Table 16	Concerns regarding the large number of road junction road junction improvements listed.	1	GUA	Noted. This is based on the Old Oak Strategic Transport Modelling Study
DiFs	The potential impact on delivery of affordable housing is a key concern in terms of the funding gap highlighted in the DIFS. It is essential that updated data is provided and that alternatives are presented.	1	GUA	Noted. OPDC commissioned an Affordable Housing Viability Assessment to model the impact of different delivery options on 5 typical sites in the development area to determine the overall affordable housing policy in terms of percentage targets and affordable housing tenures. The study does not include the infrastructure requirements needed to comprehensively unlock development sites. These infrastructure requirements will need to be considered through the detailed assessment of planning applications and through an assessment of funding opportunities to deliver the infrastructure. This need for infrastructure funding is recognised in the Delivery and Implementation chapter and in Policy SP10.

Chapter 13	Delivery and implementations sections should ensure that accessible and inclusive design is considered at each stage of the planning process.	1	Hammersmith and Fulham Disability Forum	No change proposed. The requirement for accessible and inclusive design is covered in Policy SP9 and Policy D3.
Chapter 13	Support GUA and Hammersmith Society response, particularly their key objectives and concerns around infrastructure provision and funding gap. A fair balance is required between funding different infrastructure priorities, including funding for affordable housing that people (including disabled people) can afford.	1	Hammersmith and Fulham Disability Forum	Noted. Please refer to the responses made to the GUA comments.
Chapter 13 s106 SPD?	If comments are too detailed for Local Plan would like them considered if SPD s are taken forward.	1	Hammersmith and Fulham Disability Forum	Noted.
chapter 13	We support GUA and Hammersmith Society concerns on affordability of infrastructure provision.		Hammersmith and Fulham Disability Forum	Noted. Please refer to the responses made to the GUA comments.
Chapter 13	Managing and Promoting Development Section should refer to accessible and inclusive design issues to be considered at each stage of the planning process.	1	Hammersmith and Fulham Disability Forum	No change proposed. The requirement for accessible and inclusive design are covered in Policy D3.
QDIe & QDIf	Monitoring - integration of distinctive heritage and successful placemaking suggested.	1	Historic England	Change proposed. OPDC is proposing a KPI that monitors the number of designated and non-designated heritage assets lost or subject to harm or re-used and enhanced through new schemes.
Table 16	Add soil treatment to infrastructure list	1	LBHF	No change proposed. This is not a matter for the infrastructure list. This needs to be dealt with during the construction phase of development. Refer to Policy EU13

Chapter 13	Pre-application discussions will have to be had with the local authority on land contamination issues	1	LBHF	Noted. This need is referenced in the supporting text to Policy EU13
Chapter 13	Include list of information required for planning applications within Local Plan	1	LBHF	Noted. OPDC have a separate validation list which should be referred to when making a planning application.
Chapter 13	Text amendments to para 13.38	1	LBHF	Change proposed. The text has been amended to pick up comments made by LBHF.
Chapter 13	Include monitoring of brownfield land being brought back into re-use listed in para 13.44	1	LBHF	No change proposed. All land is the OPDC area identified as developable is brownfield land.
Chapter 13	Boroughs should be involved in negotiations and agreements to secure infrastructure and its delivery	2	LBHF	Noted. OPDC is in discussions with boroughs and where relevant, boroughs are been included in the negotiation and agreement of s106 agreements.
Chapter 13	Query relating to Table contents (table 16) - items UT3 and UT4. What are items UT3 and UT4? Even if further work is required need to be properly identified in the table.	1	LBHF	Noted. Infrastructure items have all been updated and included in the Infrastructure Delivery Plan (IDP).
Chapter 13	Web links in Paras 13.35 and 13.37 do not work	1	LBHF	Noted. Weblinks have all been updated and corrected in the Local Plan.
Chapter 12 Environment and Utilities Policy EU3	Reference that boroughs are still lead flood authorities	1	LBHF	Change proposed. This reference has been included in the Environment chapter's water Policy (EU3) supporting text.

Chapter 13	Need to consider how boroughs are involved in planning applications	1	LBHF	Noted. The boroughs are consulted as part of the statutory consultation process and where relevant, as part of pre-application processes.
Chapter 13 / table 16	Local Plan should provide flexibility for the phasing of health infrastructure over the plan period given the uncertainties regarding the timing of growth, availability of funding, delivery options and changing models of care.	1	HUDU	Noted. The supporting text to Policy TCC4 acknowledges the need for flexibility and that the exact size of the on-site requirements for a health facility would be contingent on the population generated by the development.
Chapter 13	Health care provision should be co-ordinated across OPDC and surrounding growth areas.	1	HUDU	Noted. OPDC is working with the Local Authorities and the CCGs to achieve this. OPDC's Education and Health Study identifies the requirements for health infrastructure in the OPDC area.
Chapter 13	Concern that the planning for some of the areas is occurring too soon.	1	Old Oak Interim Forum	no change proposed. OPDC as a statutory duty to produce a Local Plan. OPDC needs to appropriately guide development in the area and include planning policies that support this.
Chapter 13	Concerns regarding the existing infrastructure capacity and its ability to cope with the first phases of development	1	Old Oak Interim Forum	No change proposed. OPDC's local Plan is supported by detailed evidence which identifies the needs for on and off-site infrastructure enhancements. These have been derived from lengthy discussions with service providers. Requirements for infrastructure are set out in the Infrastructure Delivery Plan (IDP)
??	Scrubs Lane Masterplan and Victoria Road Masterplan Scrubs Lane Masterplan and Victoria Road Masterplan the Forum hopes to have the opportunity to contribute to these via the neighbourhood planning process.	1	Old Oak Interim Forum	Noted. OPDC consulted on these documents during their production. OPDC also plans to develop Supplementary Planning Documents for specific geographic areas in OPDC. These would undergo public consultation.

Chapter 13	Land transfer - transparency is key; use of land of interest to the public	1	Old Oak Interim Forum	Noted
Chapter 13	Transparency - required for the pre-app process and viability assessments.	1	Old Oak Interim Forum	Noted. OPDC's requirements for applicants during the pre-application stage are set out in OPDC's Statement of Community Involvement (SCI).
Chapter 13	Support for the broad approach that the Local Plan has taken in seeking to identify all of the infrastructure required to support the proposed development.	2	Old Oak Park (DP9)	Noted
Chapter 13	Define figures 138, 140 and 141 as illustrative to enable flexibility in delivery.	3	Old Oak Park (DP9)	No change proposed. These have been removed from the plan and are now included in the Infrastructure Delivery Plan (IDP).
Chapter 13	Table 16 - should be defined as under review and a live element given long term development period.	1	Old Oak Park (DP9)	Change proposed. Following consideration of the issue it has been decided to have the infrastructure outside the Local Plan as a 'live document' so it can be updated regularly. This is known as the Infrastructure Delivery Plan (IDP)
Chapter 13	All-through school - should focus on expansion of existing schools in 0-20 year period	1	Old Oak Park (DP9)	Change proposed. The education requirements including the need for expansions all through schools are referred to in the Infrastructure Delivery Plan (IDP). This includes the off-site expansion of existing schools.
Chapter 13	Health centres - should be provided in a range of sizes.	2	Old Oak Park (DP9)	Change proposed. As a result of discussions with the CCGs, it is proposed that the on-site requirements are delivered within a health facility hub. Details for this can be found in Policy TCC4 and P2.

Chapter 13	Utilities - further information required.	2	Old Oak Park (DP9)	Change proposed. This is included in the Regulation 19 version of the Local Plan and in the Infrastructure Delivery Plan (IDP).
Chapter 13	Schools - focus on expanding existing schools in early development phasing.	1	Old Oak Park (DP9)	Change proposed. The education requirements are set out in Infrastructure Delivery Plan (IDP). This includes off-site expansion of existing schools.
DIFS	Funding - figures in table 7.1 of DIFS don't correlate	1	Old Oak Park (DP9)	Noted. The total figure on table 7.1 should read 1,106,400 (000)
DIFS	Highways - excessive number of proposals	1	Old Oak Park (DP9)	No change proposed. The highways infrastructure identified has been derived from detailed evidence in support of the Local Plan.
DIFS	Stations and Crossrail Extension - information required	2	Old Oak Park (DP9)	Change proposed. Details on infrastructure requirements are included in the Infrastructure Delivery Plan (IDP) and relevant policies throughout the Local Plan.
DIFS	Buses - funding clarity needed	1	Old Oak Park (DP9)	Noted. Assumptions in the Infrastructure Delivery Plan (IDP) are based on bus strategy and discussions with TfL
DIFS	Buses - local services cost and evidence	1	Old Oak Park (DP9)	Noted. Assumptions in the Infrastructure Delivery Plan (IDP) are based on bus strategy and discussions with TfL
DIFS	Buses - acknowledge impacts of HS2 development don't rely on s106/CIL	1	Old Oak Park (DP9)	Noted. Bus improvements proposed to support and associated wholly to the HS2 station are funded through the HS2 Act.

DIFS	Options don't consider /show whether Overground stations are required	1	Old Oak Park (DP9)	No change proposed. The proposed Overground stations are required to support the delivery of the Old Oak Common station and to support enhanced public transport accessibility in the area.
DIFS	Frontloading of infrastructure not required. Phasing needs reassessment.	1	Old Oak Park (DP9)	no change proposed. Infrastructure is required to appropriately mitigate the impacts of development. In some instances, this will require the frontloading of infrastructure. The phasing has been revised and updated to support the Regulation 19 local plan
Table 16	Crossrail link to WCML- oppose and should not be referred to in Local Plan	1	Osbourne Investments Ltd (Boden House) (Savills)	no change proposed. The Local Plan will continue to propose the safeguarding of land for the delivery of this connection. This connection is an important potential future connection to connect Crossrail up to the West Coast Main Line and provide Crossrail services to north-west London
Figure 142	Land ownership - Shield site incorrectly identified as being public land - its in private ownership	1	Osbourne Investments Ltd (Boden House) (Savills)	Change proposed. Land ownership has been corrected in the Reg 19 version of the Local Plan
Figure 142	Raban Management Ltd and Raban Goodhall Ltd own the existing residential property known as the Clubhouse, 74 Goodhall Street and 73 Stephenson Street, North Ealing is located within the OPDC boundary (shown outside it on maps)	1	Raban Management Ltd and Raban Goodhall Ltd	No change proposed. These properties are included within the OPDC boundary.

Figure 138 Local Plan	Page 339 figure 138. The Clubhouse, 74 Goodhall Street and 73 Stephenson Street, North EalingThe site should not be included in the industrial area as its residential. It is an existing residential site and the remainder of area to the north east is isolated and disconnected from the main industrial area	1	Raban Management Ltd and Raban Goodhall Ltd	No change proposed. The properties are identified as part of the existing residential area.
Figure 142	Page 347, figure 142. The Clubhouse, 74 Goodhall Street and 73 Stephenson Street, North Ealing, the site should not form part of the HS2 worksite.	1	Raban Management Ltd and Raban Goodhall Ltd	Change proposed. This has been corrected in the Reg 19 version of the Local Plan
Table 16	Table 16 and Figure 140 numbering is inconsistent. The link to Kensal Canalside does not appear on the table and should be included.	1	Royal Borough of Kensington and Chelsea	Change proposed. This has been corrected in the Reg 19 version of the Local Plan and in the Infrastructure Delivery Plan (IDP)
Table 16	Item T20 in Table 16 phasing should be brought forward	1	Royal Borough of Kensington and Chelsea	No change proposed. This road is not deliverable until the North Pole East site is brought forward for development. The North Pole East site is required for Counters Creek construction purposes by Thames Water in the short to medium term and is safeguarded as a strategic rail freight site.
paragraphs 13.29 – 13.32	Part of the North Pole East depot does not have a rail freight designation and this needs to be recognised (also other issues with the depiction of this site).	1	Royal Borough of Kensington and Chelsea	No change proposed. OPDC understands that the whole of North Pole East is safeguarded as a strategic rail freight site.

Chapter 13	Supportive of the need for improvements to infrastructure, but concerned that the DIFS focuses on the Old Oak Common area. There are issues with transport and utilities in Park Royal.	1	SEGRO	Change proposed. More detailed evidence has been collected on the infrastructure needs in Park Royal and this has been included in the Reg 19 Local Plan and in the Infrastructure Delivery Plan (IDP).
Table 16	An additional entry should be made to this table and shown on the map for an additional structure to extend cycle lanes along Scrubs Lane and over Mitre Road bridge. (table 16)	1	TfL	Change proposed. Cycling facilities have been included in the Scrubs Lane place policy and in the Infrastructure Delivery Plan (IDP).
Figure 105/ Figure 140/ Table 16	Clarification/consistency is needed between Figure 105/Figure 140 and Table 16	1	TfL	Noted. The figures in the Regulation 19 Local Plan have been checked for consistency.
Para 13.31 Local Plan	The reference in the first sentence in para 13.31 should be to Crossrail depot (singular).	1	TfL	Change proposed. The Crossrail depot is now referred to singularly.
Chapter 13	The development of the OPDC is the equivalent of a new town but with the added complications of it being in an established urban area with pre-existing infrastructure that is not necessarily in the right place or fit for its new purpose.	1	The Hammersmith Society	Noted. The Local plan's policies set out the required approach to development and infrastructure to help to unlock this complex development site.
Chapter 13	The existing land is likely to be contaminated and there are no estimates of this provided. Concerned that over reliance on private sector to fund decontamination and infrastructure may affect quality of development.	1	The Hammersmith Society	Noted. Treatment of contamination is a development costs. Assumptions regarding the treatment of contamination have been made as part of the assumptions of the viability of the plan's policies in the Whole Plan Viability Study and the Affordable Housing Viability Assessment.

Chapter 13 and Policy D4	There may actually be a disadvantage to building excessively high blocks due to the associated high costs of construction and maintenance. It is hoped that this will mitigate against the threats of the very high buildings coming forward.	1	The Hammersmith Society	no change proposed. The higher construction costs for higher densities and tall buildings have been reflected in the viability work undertaken in the Whole Plan Viability Study and the Affordable Housing Viability Assessment. The Local Plan recognises that the public transport access makes much of the OPDC area appropriate for high densities and that this can help to address London's need for homes and jobs. This accords with the principles of sustainable development as set out in the NPPF.
Chapter 13	Determining Planning Applications Section - Unclear what the remit of PLACE is and how it operates. Commend the arrangements in LBHF.	1	The Hammersmith Society	Noted. The Delivery and Implementation chapter has been updated to further clarify the role and function of the PLACE review group. Further clarification has also been added to Policy D1.
Chapter 13	Question how planning applications will be considered in the short term and the need to manage the impacts on existing communities	1	The Hammersmith Society	Noted. Planning applications are determined against the Development Plan and other material planning considerations. The need for impacts on existing communities to be appropriately managed is covered through a range of the policies in the Local Plan.
Chapter 13	Can have a 20-30 year long term vision but not a long term Plan - a short term Local Plan is required to ensure flexibility/adaptability.	1	The Hammersmith Society	No change proposed. Central Government requires plans to cover a minimum 15 years. The Local Plan can be regularly updated to respond to new emerging policy issues and the KPIs ensure the policies are being monitored to ensure they are appropriately supporting the spatial vision.
Chapter 13	Community infrastructure should fit with needs of community, particularly an A&E and schools.	1	Wells House Road Residents Association	Noted. Requirements for community infrastructure are set out in the Infrastructure Delivery Plan (IDP). The Local Plan relates to infrastructure needed to support the needs of new development in the area.

Chapter 13	Ask for a transparent spend process to be developed for CIL.	1	Wells House Road Residents Association	Noted. The CIL spend process will be developed before the adoption of the OPDC CIL Charging Schedule.
Chapter 13	Define Old Oak South. Query whether Local Plan is required in light of Old Oak masterplan	1	1 Resident	No change proposed. As a local planning authority, OPDC has a statutory requirement to produce a Local Plan. The masterplan is not a statutory planning policy document and will only cover part of the OPDC area
Chapter 13	Query re agenda re engagement with National Grid	1	1 Resident	Noted. The National Grid have been involved in the work on the Utility Study and updated IDP.
Chapter 13	Future of Grand Union Canal sub surface 132kV cables	1	1 Resident	Noted. Requirements for electricity infrastructure are contained in OPDC's Infrastructure Delivery Plan (IDP)
Chapter 13	Land transfer arrangements request	1	1 Resident	No change proposed. The potential transfer of land to OPDC has no impact on the need for and coverage of policies within OPDC's Local Plan. The transfer of land does not remove the requirement for OPDC to produce a Local Plan. OPDC is the local planning authority for the area. It has a statutory responsibility to produce a Local Plan. The Local Plan will be used in the determination of planning applications, including those submitted by public sector landowners, including OPDC as landowner.
Chapter 13, CIL	Residents and businesses should be involved in CIL expenditure decisions	1	1 Resident	Noted. The CIL spend process will be developed before the adoption of the OPDC CIL Charging Schedule.

QD1a-d	All infrastructure looks important, but T16 is less important	1	1 Resident	No change proposed. The Local Plan proposes to safeguard land for the delivery of this connection.
Chapter 13	Impact of Development phasing on individuals	1	workshop attendee	No change proposed. Appropriately managing the impacts of construction on individuals is covered through Policy SP10, Policy T8 and a number of policies in the Environment and Utilities chapter.
Chapter 13	Prioritising infrastructure	3	workshop attendees	Noted. Contributions towards infrastructure will be prioritised as part of consideration of development proposals and the need to appropriately mitigate the impacts of development.
Chapter 13	Consultation process	2	workshop attendee	Noted. The process of consultation on the Local Plan, other policy documents and planning applications is set out in OPDC's Statement of Community Involvement.
Table 16	score these (infrastructure items) rather than ordering them	1	workshop attendee	No change proposed. It is not considered appropriate to score infrastructure. Infrastructure requirements are detailed in OPDC's Infrastructure Delivery Plan (IDP)
Table 16	waste disposal facilities were not on the list of options	1	workshop attendee	Change proposed. Waste infrastructure has been included in the Infrastructure Delivery Plan (IDP) and is required through policies in the Environment and Utilities chapter.
Table 16	some items are vital and some are ‘less essential’	1	workshop attendee	Noted. OPDC does not propose to prioritise infrastructure as infrastructure priorities would differ on a scheme by scheme basis.

Table 16	impossible to rank as they are all critical	2	workshop attendee	Noted. OPDC agrees and recognises that infrastructure priorities will differ on a scheme by scheme basis.
Table 16	surely health centres should be further up because they will be used by everyone	2	workshop attendee	No change proposed. The ordering of the table was not proposed to be a priority ordering for infrastructure. Infrastructure is now listed in OPDC's Infrastructure Delivery Plan (IDP) and as with Table 16, the listing of this infrastructure here is not in a priority order.
Table 16	education facilities high priority	1	workshop attendee	Noted. OPDC recognises that education facilities are important. Education infrastructure is included in OPDC's Infrastructure Delivery Plan (IDP). OPDC does not propose to prioritise infrastructure as infrastructure priorities would differ on a scheme by scheme basis.
Table 16	police shop (should come) above the community centres	1	workshop attendee	No change proposed. The ordering of the table was not proposed to be a priority ordering for infrastructure. Infrastructure is now listed in OPDC's Infrastructure Delivery Plan (IDP) and as with Table 16, the listing of this infrastructure here is not in a priority order.
Consultation	'compartmentalisation of engagement sessions is very hard for residents'	1	workshop attendee	Noted. This comment relates to the Regulation 18 consultation workshops. Workshops were broken down into chapter themes, but all comments made in the workshops have been included in the Statement of Consultation issues schedules.

Consultation	a survey should be done on all of these points to see what people want by knocking on doors	1	workshop attendee	No change proposed. OPDC sent leaflets to residents as part of the Regulation 18 consultation. Door to door surveys cost a significant amount of money. OPDC has undertaken door to door surveys on focussed issues, but OPDC has needed to balance the need for appropriate engagement with the cost implications of more innovative engagement techniques.
Table 16	sports centres are not a priority because there is a good one nearby	1	workshop attendee	No change proposed. A study by Sport England has identified that the area is deficient in access to public sports centre. The need for on-site public sports centres is therefore identified in Policy TCC6 and the Infrastructure Delivery Plan (IDP).
Table 16	prioritisation was difficult because of a lack of understanding of the demographics of the new community	1	workshop attendee	Noted. Further details on the demographic background to the existing community can be found in the Socio-Economic Baseline Study. The Local Plan policies support the creation of a mixed and balanced community in Old Oak and Park Royal, meaning people will be from a variety of backgrounds.
Chapter 13	To pre-build or not to pre build health facilities	2	workshop attendee	Noted. Requirements for health facilities are set out in OPDC's Infrastructure Delivery Plan (IDP).
Chapter 13	if pubs are important, perhaps schools should be higher	1	workshop attendee	No change proposed. The ordering of the table was not proposed to be a priority ordering for infrastructure. Infrastructure is now listed in OPDC's Infrastructure Delivery Plan (IDP) and as with Table 16, the listing of this infrastructure here is not in a priority order.

Chapter 13	the position of any secondary school would depend on what type it was	1	workshop attendee	Noted. The Local Plan proposes to deliver the secondary school at Acton Wells. The rationale for this is outlined in the Education and Health Study.
Delivery and Implementation	concern over CPO of freehold businesses	1	workshop attendee	Noted. CPO would only be employed where it is required to deliver infrastructure or the comprehensive and/or coordinated development of the area.
Delivery and Implementation	Are buildings owned by businesses as freehold or not?	1	workshop attendee	Noted. There is a variety of ownership across the OPDC area.
Delivery and Implementation	Answered No to question Do you think we have identified the infrastructure within the right phases (0-20 years being within this plan period and 20+ years being after this Local Plan)?	1	Commonplace	Noted. Without details over what is incorrect, OPDC is unable to respond to this comment.

14. Glossary

Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
Glossary	NPPG reference is incorrect.	1	London Borough of Brent	Change proposed. Change thas been made to local plan glossary.
Glossary	Should define 'Accessible and inclusive design' and cross reference this to the definition of 'inclusive design'.	1	Hammersmith and Fulham Disability Forum	Change proposed. This has been included in the glossary.
Glossary	Definition of Lead Local Flood Authority should be added.	1	London Borough of Hammersmith and Fulham	Change proposed. This has been defined in the glossary.
Glossary	Definition of Drainage Hierarchy should be added.	1	London Borough of Hammersmith and Fulham	Change proposed. It has been clarified that this is the drainage hierarchy in the London Plan.

15. Integrated Impact Assessment

Section of Local Plan comments relates to	Issue summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
IIA	IIA does not provide assurances that local people, vulnerable, disabled and older people from existing and new communities will benefit from the Local Plan over the next 20 years.	1	Hammersmith and Fulham Disability Forum	No change proposed. The IIA sets out a number of objectives including 1, 5, 13, 15, 16, 17 which define elements relating to local existing and future communities, vulnerable, disabled and older people which are used to assess each policy within the Local Plan.
IIA	Table 3-1: Within the national documents, we would expect to see the National Planning Policy Guidance (NPPG). Historic England's Good Practice in Planning Note 'The setting of Heritage Assets'1 and advice note 'Tall Buildings'2 should also be included here. At regional level it would be suitable to include the Mayor's Supplementary Planning Guidance on Character and Context (2014).	1	Historic England	Change proposed. These guidance documents will be referred to in the IIA
IIA	Table 3-1: We also advise that at local level the conservation area appraisals for the conservation areas within, or adjoining, the plan area should be included, where they exist – for instance, the CAA for Kensal Green Cemetery prepared by the Royal Borough of Kensington and Chelsea.	1	Historic England	Change proposed. These documents will be referred to in the IIA

IIA	Table 3-2 – the theme for the historic environment – derived from the NPPF in Table 3-1 – requires re-wording, and appears to have muddled 'landmark' with 'landscape'. We recommend that this is amended to similar wording for the biodiversity theme: 'Conserve and enhance the historic environment including designated and undesignated heritage assets and their settings.' This is an important point as the IIA/SEA has a key role in making sure that the positive contribution of the area's cultural heritage is harnessed and that the impact of new development, particularly taller development, is assessed and harm avoided or mitigated. Therefore a stand-alone heritage theme is needed.	1	Historic England	No change proposed. Table 3-2 sets out common themes derived from the review of plans, programmes and environmental protection objectives of relevance to the IIA. Objective 12 sets out a specific objective used to assess policies in relation to the historic environment.
IIA	Section 3.6 Baseline and key sustainability issues – Appendix C - We welcome the use of the Historic Area Assessment for Old Oak. It would be helpful to identify the need for a viewpoints assessment and conservation area appraisals for the Grand Union Canal and other CAs under the data gaps heading. A further Historic Area Assessment is also in need of preparation for Park Royal.	1	Historic England	Change proposed. These elements will be referred to in the IIA

IIA	Table 3-3 Key Sustainability issues and opportunities Cultural heritage assets, p29 – This summary is useful, although some corrections are needed: - in the first bullet change 'undeclared' to 'undesignated' - in the key issue column - the plan area includes a proposed conservation area on the east side of Scrubs Lane. - the undesignated heritage assets, including the industrial, railway and canalside heritage, should be referred to for the possibilities they provide for retaining and enhancing character and distinctiveness. This is detailed in the Historic Area Assessment for Old Oak. - The implications/opportunities column would benefit from reference to the potential impact on the setting and significance of heritage assets from taller buildings (see also comments below)	1	Historic England	Change proposed. IIA will be amended to reflect proposed changes.
IIA	Table 3-3 Key Sustainability issues and opportunities Landscape and townscape, p31 – within the implications/opportunities column, we suggest that a key issue is the disposition of the building heights, especially the siting of tall buildings. It would be good to include this more explicitly here. However, we do also recommend that this is an issue identified under the cultural heritage topic due to the close inter-relationship.	1	Historic England	Change proposed. IIA will be amended to reflect proposed changes.

IIA	Table 3-3 Key Sustainability issues and opportunities Landscape and townscape, p31 – Key issues: first bullet - the eastern boundary of the plan area is formed by St Mary's Cemetery, which forms a continuous landscape with the grade I historic park of Kensal Green Cemetery. Within the implications column, we consider the fifth bullet should be amended to read 'careful siting of tall buildings'	1	Historic England	Change proposed. IIA will be amended to reflect proposed changes.
IIA	3.6.4 Cross-boundary considerations, p36 There are potential cross-boundary considerations in terms of the proposed scale of development - for instance, the need to understand the impacts on the setting and significance of Kensal Green Cemetery in the Royal Borough of Kensington and Chelsea from tall buildings within the Old Oak area. This will require careful analysis and management.	1	Historic England	Change proposed. IIA will be amended to reflect proposed changes.
IIA	Table 3-4 IIA Framework, p39 Within IIA objective 1 'To enhance the built environment and encourage 'place-making'' there should be an explicit sub-objective to ensure that the scale of new development sits comfortably within the local area and itself is a high-quality, liveable environment.	1	Historic England	No change proposed. This aspiratoin is reflected in the penultimate sub-objective related to Lifetime Neighbourhoods.
IIA	Table 3-4 IIA Framework, p39 The illustrations within the draft plan are currently disappointing, and do not suggest an attractive environment of any distinction. A further sub-objective should be added here to cover this – in addition to the first sub-objective with which we agree.	1	Historic England	No change proposed. It is not considered relevant for the IIA to assess illustrative graphics within the Local Plan.

IIA	Table 3-4 IIA Framework, p39 IIA objective 12 – We welcome the sub-objectives identified. It would be helpful to clarify that the second bullet refers to designated and undesignated assets.	1	Historic England	Change proposed. IIA will be amended to reflect proposed changes.
IIA	6.3 Appraisal findings We disagree with the findings for objective 4 which seem to interpret this principally in terms of the biodiversity value of the open spaces and canal. This appears to give a different emphasis and obscures the reference to the significance of the heritage assets in the area. The recommendation consequently fails to identify the role of the heritage assets within and adjoining the area for any purpose beyond tourism and leisure. Please see Historic England's response to the draft plan and our recommended changes to objective 4.	1	Historic England	Noted. Assessment of related content of the Regulation 19 draft Local Plan will consider the historic environment to address raised concerns.
IIA	7. Appraisal of Regulation 18 Local Plan Policies and Options Historic England is surprised that the appraisal has not identified the potential for significant impacts on the setting of heritage assets, and most notably the setting of Kensal Green Cemetery, a grade I Historic Park and Garden containing c140 structures and monuments. The cemetery is of national significance and any impacts should be very carefully evaluated. The densities defined and mapped in the draft plan on pages 42/43 are very challenging in terms of integration with the surrounding townscape and heritage assets.	1	Historic England	No change proposed. Paragraphc 7.4.1. identifies that Policy D6 are predicted to deliver major effects.

IIA	The Council previously submitted comments on the Integrated Impact Assessment (IIA) Scoping Report. The Council notes that these comments have been responded to and welcomes the additions/changes that have been agreed as a result by the OPDC. The Council also notes that the suggested changes to specifically mention the Grade I listed (Registered Park and Garden) Kensal Green Cemetery has not been accepted alongside the indicator for objective 12. However, the baseline data in Appendix C, C.10.1 does mention it. This inconsistency needs to be corrected. The Council also notes English Heritage's (now Historic England) comments supporting the attention to detail in the IIA scoping report to Heritage at Risk. They also made supportive points regarding the level of detail in section 5.4 in relation to Kensal Green Cemetery but expressed an expectation to see this consideration flow through the document.	1	Royal Borough of Kensington and Chelsea	Change proposed. IIA will be amended to specifically mention the Grade I listed (Registered Park and Garden) Kensal Green Cemetery within Objective 12.
IIA	The Council supports the identified implications/opportunities for the Local Plan in this regard as set out in Table 3-3 of the IIA. In particular (page 29) stating "Statutory sites outside the OPDC boundary also need to be protected and safeguarded, particularly in terms of their setting. Cross-boundary issues with respect to heritage assets and views need to be addressed."	1	Royal Borough of Kensington and Chelsea	Noted.

Appendix C

Organisations invited to make representations on Regulation 18 Draft Local Plan

Organisation
Aedas
Anderson Wilde & Harris
ARK Bentworth Primary Academy
Asda
Assersons
Aston Insurance
Atkins
Aurora Property Group
Balfour Beatty
Battersea Power Station Development Company
Bechtel
Beehive Projects
Benoy
BIS
Boden
Brent Cyclists
Brent Friends of the Earth
Brent Housing Action
British Embassy Beijing
Brown & Mason Limited
Burlington Danes Academy
Campaign for Better Transport
Canal & River Trust
Capital Accountants Ltd
Capital PIP
Car Giant
Cargiant
Catch 22
CBRE
CH2M
Chiltern Railways
Chris Blandford Associates
City & Docklands, Portal West
Civil Aviation Authority
CLAD
CLAUK
College Park and Old Oak (H&F)
College Park Residents Assocaition

Organisation
Construction Products Association
Cothill Educational Trust
Create Streets
Crossrail
Curtins
Custard Factory
Dartmouth Capital Advisors / City Developments Limitied
DCLG
Deloitte
Department for Transport
Diageo
Diocese of London
East Acton Golf Links Residents' Association
Ecotricity
Elmwood Residents' Association
EMR
Enabling Projects (Town Planners)
English Heritage
Environment Agency
ESI
Essential Living
Family Mosaic
Fine Art Research & Prison Outreach
Foreman Roberts
Forty Shillings
Friends of Wormwood Scrubs
Furness Primary School (LBB)
Genesis Housing Association
Gensler
GL Hern
Global Guardians
Goldsmiths Residents Association
Grand Union Alliance
Greater London Authority
Groundwork London
Guiness
H&F Historic Buildings Group
H&F Urban Studies Centre
Hammersmith & Fulham Liberal Democrats
Hammersmith and West London College
Hammersmith BID
Hamon Investment Group
Hanger Hill East and Hanger Hilll Garden Estate Residents Associations

Organisation
Harlesden Methodist Church
Harlesden Neighbourhood Forum
Harlesden Town Team
Haylock Planning and Design
Health and Safety Executive
Heathrow Airport
High Speed Two Limited
Highways Agency
Highways England
Hilti (Gt. Britain) Ltd
Historic England
HOK
Homes and Communities Agency
House of Lords
Howard Kennedy
IFC Group (International Fire Consultants Limited)
Imperial College London
Instinctif
I-UK
John Perryn Primary School (Ealing)
Just Space
Kenmont Primary School (LBHF)
Kensal Green Programme
Labour Group
Latin Elephant
LCR
Liberal Democrat Group
Line Planning Ltd
London & Regional Properties
London Assembly Members
London Assembly Planning Committee
London Borough of Brent
London Borough of Ealing
London Borough of Hammersmith and Fulham
London Borough of Hounslow
London Citizens
London Docklands Development Corporation (Former)
London Forum of Amenity and Civic Societies
London Legacy Development Corporation
London Public Health England
London Rail
London Sustainable Development Commission
London Theatre Company

Organisation
London Underground
Longford Trust
Marine Management Organisation
Martell Electronics Ltd
Mayor of London's Office
MBA Architects Ltd
Midland Terrace Residents Association
Mount Anvil
Museum of London Archaeology (MOLA)
Natural England
Natural History Museum
Network Rail
Network Rail, High Speed Rail Development
NHS Brent CCG
NHS Ealing CCG
NHS England
NHS West London CCG
North Kensington Gate
NQP Development Services
Ocean Media
Office of Rail Regulation
Ogilvie Geomatics Ltd
Old Oak / Mosaic Housing
Old Oak Primary School (LBHF)
Only Connect and West London Zone
Paisley-Tyler & Co Ltd
Palestra
Park Royal Business Group
Peachcroft
Pentecostal City Mission Church
Plowman Craven
Powerday
PRBG
QPR
Quattro
QUOD
Rail Exec
Regent's Network
Residential Moorings Group
Residents south of WWS
Respect Care
Revo Seccus Ltd
Rise

Organisation
Robert Bird
Royal Borough of Kensington and Chelsea
Savills on behald of QPR
Scanprop Development, Stockholm
Scenario Architecture
Science Museum Group
SEGRO
Shepherd's Sandwich Bar
Skanska
St Helens Residents Association
St. Quintin and Woodlands Neighbourhood Forum
Stadium Capital Holdings
Stonebridge (Brent)
Thames Valley Harriers / Linford Christie Stadium
Thames Water
The Daylight Company Ltd
The Hammersmith Society
The Hyde Group
Thesqua
TITRA
Transition Willesden
Transport for all
Transport for London
UK Regeneration
UKTI British Consultate
Urban Legacies Limited
Useful Simple Projects
Velocity
WCRA
We Care Foundation
Wells House Road Residents Association
Wesley Estate residents association
West Acton Residents Association
West Ealing BID
West London Alliance
West London Business Alliance
West London Waste Authority
WestTrans
Whitedrake
Wormoholt and White City Neighbourhood Forum
Wormwood Scrubs Charitable Trust
Wormwood Scrubs Pony Centre
Wormwood Scrubs Trust

Appendix D

Copies of Regulation 18 Consultation Material

Copy of email sent inviting representations on the Draft Local Plan

Our first newsletter - exciting news from OPDC View in browser

OPDC
OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION

PATORA, HELP SHAPE THE LOOK AND FEEL OF OLD OAK AND PARK ROYAL





Since the Mayor launched his second development corporation last year, the Old Oak and Park Royal Development Corporation (OPDC) has had a busy ten months making good progress by getting the Opportunity Area Planning Framework adopted by the Mayor and meeting with local people, communities and businesses.

To make the UK's largest regeneration project a success for local people, Londoners and the UK over the next 30 plus years there is a lot to do. One of the most important things in 2016 is the development and public consultation of a Local Plan for the area. This document is important because, following its adoption in 2017, the Local Plan will provide the guidelines for planning applications and development of Old Oak and Park Royal.

To help shape this document we want you to tell us about your neighbourhood, the place you live and work in. To take part in the public consultation, you can comment on the Local Plan at face to face workshops, online or by post. I hope you will benefit from this opportunity and we look forward to working with you in the months and years to come.

Find out now

Share:

GET INVOLVED!





Since the launch of OPDC, my focus to date has been to set a clear planning framework, de-risk the land and develop a clear strategy to deliver homes and jobs. We have attracted the best expertise to lead on the planning; set out strategies for Socio-economic regeneration, Communications and Engagement and Land acquisition; and are working hard to influence key decisions that will impact on the future success of Old Oak and Park Royal, including the design of the future HS2 station. We are just ten months into a 30-40 year programme, but good progress is being made to support maximum delivery of homes and jobs in the area. Now is your chance to get involved and help shape your neighbourhood, the place you live and work in, by sharing your views right at the start – through the Local Plan Consultation you really can help to influence the transformation of this part of west London. To learn more about what the future of Old Oak and Park Royal could look like, just take a look at our film – we hope you share our excitement and get involved.

Watch here

Share:

READ THE DRAFT LOCAL PLAN AND SUPPORTING STUDIES

Now you have seen the film, you can read the draft Local Plan and tell us what you think. The Plan and all supporting studies can be viewed at the link below and at:

Acton Town Library
Brent Civic Centre
Ealing Council Office
Hammersmith Town Hall

Harlesden Library

Old Oak Community Centre

Shepherd's Bush Library

Read now

Share:



PARTICIPATE IN AN EVENT

To talk to the OPDC team and explore the Local Plan in person you can drop in to a public exhibition or book a place on a workshop. Dates and times of drop in sessions and workshops can be found by clicking the button below. In addition, you can participate by tweeting questions during a Question & Answer session using #opdclocalplan.

Event dates & times

Share:



PROVIDE COMMENTS

To provide feedback on the Local Plan and share your views, visit opdc.commonplace.is, email localplan@opdc.london.gov.uk or write to Local Plan Consultation, Old Oak Park Royal Development Corporation, City Hall, Queen's Walk, London SE1 2AA

Comment now

Share:



Find out more

Your community engagement team

Last but not least, recruiting is underway to bolster OPDC's Community Engagement team. We look forward to introducing new team members to everyone in due course but in the meantime, we say goodbye to Alexandra Day who is moving on in mid-February to another exciting role at Groundwork South. We'd like to thank her for the work at OPDC and wish her well.

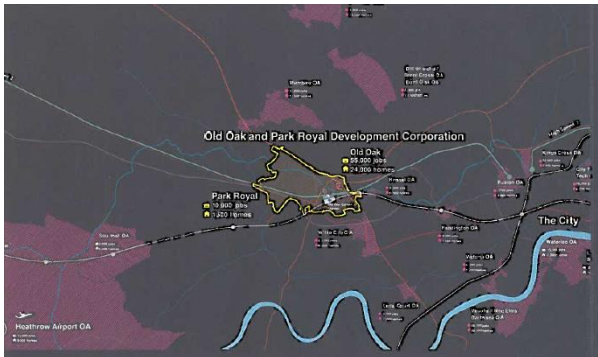
To ask a question about the Local Plan for Old Oak and Park Royal, you can email us at localplan@opdc.london.gov.uk, call 020 7983 5732, visit our new Facebook page www.facebook.com/OldOakParkRoyal or tweet @OldOakParkRoyal #opdclocalplan.

Join the conversation

If you no longer wish to receive emails from us please unsubscribe to make our emails more relevant to you

This email is from City Hall, The Queen's Walk, London, SE1 2AA www.london.gov.uk

Copy of Leaflet sent to 55,000 local business and residents.



What is the future vision for Old Oak and Park Royal?

A thriving part of London connected to the rest of the UK and internationally. Old Oak and Park Royal will be a centre for innovation and growth that will shape west London and strengthen London's role as a global city. A new commercial hub with cultural uses, alongside a diverse network of vibrant neighbourhoods, will help create a London destination recognised as an exemplar in large-scale housing and employment led regeneration.



Sir Edward Lister

Deputy Mayor for Planning and Chair of the Board, Old Oak and Park Royal Development Corporation

Since the Mayor launched his second development corporation last year, the Old Oak and Park Royal Development Corporation (OPDC) has had a busy ten months making good progress to get the Opportunity Area Planning Framework adopted by the Mayor and meeting with local people, communities and businesses.

To make the UK's largest regeneration project a success for local people, Londoners and the UK over the next 30 plus years there is a lot to do, and one of the most important things in 2016 is the development and public consultation of a Local Plan for the area. The Local Plan is an important document because, following its adoption in 2017, it will provide the guidelines for planning applications and development of Old Oak and Park Royal.

To help shape this document we want to hear from you and what you have to say about your neighbourhood, the place you live and work in. Whether you are a local resident, a member of a community group, a business owner, worker or student we want to hear from you. To get involved in our public consultation we are offering many ways for you to comment on the Local Plan, you can do so either at face to face workshops, online or by post. I hope you will take advantage of this opportunity and we look forward to working with you over the months and years to come.

What's planned for Old Oak and Park Royal?

- 25,500 new homes
- 65,000 new jobs
- An enhanced Park Royal
- New parks, public squares, improvements to spaces along the Grand Union Canal and continued protection of Wormwood Scrubs
- 3 new rail stations with new and improved bus services, streets, cycle links and canal towpaths
- New town centres, community uses, services and catalyst uses

What will be the role of the Local Plan?

OPDC's Local Plan will be the key planning policy document for the entire area of Old Oak and Park Royal. It will contain policies that will be used to determine planning applications from developers and will shape the area for the next 20 years to deliver a new part of London.

How can you help shape the Local Plan?

This version of the Local Plan is a draft document. It has been specifically produced for public consultation and this is an opportunity for you to comment on and shape its content. You can respond to the consultation questions and comment on any part of the document and its supporting studies.

Come along to a drop-in exhibition or workshop and find out more about the Local Plan, or get involved online or via Twitter. All the consultation information will be available to view online and hard copies can also be requested.

You can submit comments through:

Online engagement platform	opdc.commonplace.is
Email	localplan@opdc.london.gov.uk
Post	Local Plan Consultation OPDC City Hall, Queen's Walk London SE1 2AA

GET INVOLVED!

Read the draft Local Plan and supporting studies at:

opdc.commonplace.is

- Acton Town Hall Library
- Brent Civic Centre
- Ealing Council Offices
- Hammersmith Town Hall
- Harlesden Library
- Old Oak Community Centre
- Shepherd's Bush Library

Participate in an event:

Drop-in to a public exhibition:

Thursday 11 February	2pm – 5pm	Harlesden Methodist Church
Saturday 13 February	11am – 2pm	Old Oak Community Centre
Monday 15 February	4pm – 7pm	Holiday Inn, North Acton
Wednesday 24 February	2pm – 5pm	Cumberland House, Scrubs Lane
Wednesday 2 March	4pm – 7pm	Holiday Inn, North Acton
Thursday 17 March	4pm – 7pm	Holiday Inn, North Acton

Book a place on a workshop (places are limited):

Overview	Thursday 11 February	6pm – 8pm	Harlesden Methodist Church
Community Infrastructure	Saturday 13 February	11.30am – 12.30pm	Old Oak Community Centre
Old Oak Places	Monday 15 February	6pm – 8pm	Holiday Inn London-West, North Acton
Wormwood Scrubs	Saturday 20 February	11am – 12noon	Linford Christie Stadium
Design and Heritage	Tuesday 23 February	6pm – 8pm	Cumberland House, Scrubs Lane
Old Oak Places	Wednesday 24 February	6pm – 8pm	Cumberland House, Scrubs Lane
Park Royal Places	Wednesday 2 March	6pm – 8pm	Holiday Inn London-West, North Acton
Employment	Thursday 3 March	6pm – 8pm	Holiday Inn London-West, North Acton
Transport	Monday 7 March	6pm – 8pm	Harlesden Methodist Church
Environment, Open Spaces and Public Realm	Thursday 10 March	6pm – 8pm	Harlesden Methodist Church
Housing	Thursday 17 March	6pm – 8pm	Holiday Inn London-West, North Acton

Tweet questions during a Question & Answer session:

@OldOakParkRoyal
#opdclocalplan
Visit opdc.commonplace.is to find out when these are taking place

To find out more go to:

localplan@opdc.london.gov.uk
020 7983 5732
@OldOakParkRoyal
www.facebook.com/OldOakParkRoyal

OPDC
OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION

Have your say on the Local Plan for Old Oak and Park Royal





Public consultation 4 Feb to 31 March

MAYOR OF LONDON

Copy of Statutory Notice placed in Local Newspaper Brent and Kilburn Times, Ealing Gazette and Harrow Times

PUBLIC CONSULTATION
(Draft Local Plan - Proposals)
Planning and Compulsory Purchase Act 2004 and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 – Draft Local Plan for the Old Oak and Park Royal Development Corporation

Notice is hereby given, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 that the Old Oak and Park Royal Development Corporation has produced a draft version of the Old Oak and Park Royal Local Plan for consultation.

Title of Document:

The Old Oak and Park Royal Development Corporation Draft Local Plan

Subject Matter and Area of the Development Plan Document:

The Draft Local Plan sets out the vision, objectives and detailed spatial strategy for future development in the Old Oak and Park Royal Development Corporation's area for the next 20 years along with specific development management policies. It is accompanied by a Sustainability Appraisal and Strategic Environmental Assessment, Health Impact Assessment, Equalities Impact Assessment and Habitats Regulations Assessment.

The Local Plan covers the whole administrative area of the Old Oak and Park Royal Development Corporation.

Period within which representations may be made:

Thursday 4th February 2016 until midnight on Thursday 31st March 2016.

How to comment

To make comments on the draft Local Plan and associated documents please use one of the following methods, providing your name and contact details:
Online: opdc.commonplace.is
Email: localplan@opdc.london.gov.uk
Post: Local Plan Consultation, Old Oak and Park Royal Development Corporation, City Hall, Queen's Walk, London SE1 2AA020

How to find out more

The Draft Local Plan and supporting documents may be viewed online at: opdc.commonplace.is or at the following locations during normal office hours:

- Acton Town Hall Library, High Street, W3 6NE;
- Brent Civic Centre, Engineers Way, Wembley, HA9 0AF;
- City Hall, Queens Walk, London, SE1 2AA;
- Ealing Council Offices, Perceval House, 14/16 Uxbridge Road, W5 2HL;
- Hammersmith Town Hall, King Street, W6 9JU;
- Harlesden Library, NW10 8SE;
- Old Oak Community Centre, Braybook Street, W12 0AP; and
- Shepherd's Bush Library, 6 Wood Lane, W12 7BF.

Alternatively, hard copies of this Local Plan can be made available on request by contacting OPDC, either via email or by post (see above).

OPDC will hold a number of drop-in sessions, as well as workshops for specific policy issues. Dates and times for these can be found online (see above) or, alternatively, please contact OPDC via the email provided or on 0207 983 5732.

Facebook and Twitter posts publicising Local Plan Consultation and Consultation Events







Appendix E

Regulation 19(1) Summary of Main Issues Raised and Officer Response

1. Introduction

Who raised the issue	Summary of Issue	OPDC Response
Old Oak Interim Forum, Wells House Road Residents Association, and 11 residents	**Strategic policies:** Disagree that the Local Plan should set out which are and which are not strategic policies. Particularly disagree with the place policies as being strategic policies	Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.

2. Spatial Vision

Who raised the issue	Summary of Issue	OPDC Response

Hammersmith Society, Wells House Road Residents Association, and 11 residents	**Community-led Vision and Objectives:** The alternative Community-led Vision and Objectives suggested by the Hammersmith Society is still relevant.	The Community-led vision and objectives submitted with the Regulation 18 consultation responses by the Hammersmith Society have been embedded within the amended Spatial Vision, narratives and policies.

3. Strategic Policies

Who raised the issue	Summary of Issue	OPDC Response
Grand Union Alliance, Sport England, Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association and 11 residents	**Improving health and reducing health inequalities:** The Local Plan should include further policy detail about the various factors that contribute to good health and what impacts negatively on health.	Some amendments have been made to the supporting text to identify some further positive of negative determinants of health, but these have not all been included as there are a multitude of factors that impact on health and well-being and the supporting text clarifies that these are addressed through a number of policies throughout the Local Plan.
Hammersmith Society, Wells House Road Residents Association, and 11 residents	**Densities:** The densities proposed in the Local Plan exceed established guidelines. The Plan is therefore unsound.	In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF. The Draft New London Plan does not include a density matrix as it has been recognised by the Mayor that it did not appropriately recognise local context. The draft London Plan policy D6 recognises that appropriate densities should be determined through consideration of the site context, access to public transport accessibility and the capacity of surrounding infrastructure.
Hammersmith Society, ArtWest, St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Dave Turner,	**Building heights:** Insufficient justification for tall buildings and demonstration that this will deliver lifetime neighbourhoods has been provided. The Plan does not provide enough clarity on future	Further wording has been inserted into the supporting text of SP9 to clarify the average densities expected in the OPDC area based on DCS outputs to achieve homes and jobs targets.

TITRA, Grand Union Alliance, Midland Terrace Residents, and 15 residents	building heights, locations of tall buildings or definitions of tall buildings. A map of tall building locations should be provided. Indicative building heights of 40 storeys + are not justified. Density information in DCS is not reflected in the Local Plan This does not conform with London Plan policy 7.7 or NPPF para 58 and 59.	Policies D5 and SP9 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings, but within Old Oak North and Old Oak South there is a need for flexibility in the approach to achieving homes and jobs targets that will enable a response to site specific circumstances and the longer term development trajectory. OPDC considers policies SP9 and D5 are consistent with the requirements of NPPF paragraphs 58 and 59.

4. Places

Who raised the issue	Summary of Issue	OPDC Response
Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, and 11 residents	**Place policies:** The policies are too detailed and should instead be replaced by area action plans and neighbourhood plans	Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general

		conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
HS2 Ltd.	**HS2 Station capacity:** Development capacity proposed on the HS2 station and surrounds is not justified. This level of development would not be supported by enabling works currently proposed by HS2. Suggest that policies are drafted more flexibly to allow for a range of development scenarios.	The capacity for the HS2 triangle site has been revised following further development capacity work to align with the proposed HS2 enabling works.
Transport for London	**Elizabeth Line Depot:** Development of the Elizabeth Line Depot and Train Maintenance Depot should be delayed beyond the plan period.	OPDC has removed the delivery of development on the Elizabeth Line and Train Maintenance depot from the Plan period.
Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, and 11 residents	**Old Oak North Densities:** Without a commitment to the delivery of Hythe Road Station, the densities in Old Oak North are unjustified resulting in the policy being ineffective.	Development capacities and densities for Old Oak North are informed by a range of elements including existing and planned transport capacity. The Public Transport Accessibility Levels generated by Old Oak Common Station, improvements to Willesden Junction Station and

		existing/planned bus routes supports the development capacity identified for Old Oak North without solely relying on improved public transport access generated by Hythe Road Station. The policy supports the delivery of the highest public transport levels (PTAL 6B) to support the density of development.
Osbourne Investments Limited and Quattro Holdings Limited	**Elizabeth Line spur:** The Elizabeth Line rail spur has not been proved feasible or financially viable, and is not safeguarded by appropriate bodies. Safeguarding of the line has major impacts on the developability of the site, and clarify is required on its feasibility.	Proposals to deliver a link between the Elizabeth Line and West Coast Main Line have been withdrawn following the decision to explore the delivery of the West London Orbital Line and Chiltern Line. References to safeguarding land to facilitate delivery of the spur have been removed from the Local Plan. To reflect emerging transport proposals text has been provided to safeguard land for West London Orbital Route Line in Acton Wells.
London Borough of Brent, Harlesden Neighbourhood Forum	**Willesden Junction:** The proposed links from Willesden Junction Station in the diagram for P11 will not assist in improving connection between Old Oak and Harlesden, and does not reflect Brent's ambition that the Station presents strong frontage to station road.	There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local Plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
Wormwood Scrubs Charitable Trust	**Wormwood Scrubs:** Evidence should be provided for the need for any routes and enhancements to the Scrubs.	The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor

		quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with Policy P12 which requires any proposals to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 in the protection of Metropolitan Open Land.

5. Design

Who raised the issue	Summary of Issue	OPDC Response
Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, and 11 residents	**Engagement with local people:** The policy is not effective. Further clarity required for setting out different options and proactive community engagement. It should refer to the need for engagement with local people, via neighbourhood forums, as early as possible in the design process.	Proactive engagement is set out in OPDC's Statement of Community Involvement. This was updated in February 2017 to reflect requests by community groups to secure more effective engagement. The Community Review Group is being established to inform the development management process. This has been referenced in D1. Policy D1 will continue to require major and strategic development proposals to undertaken proactive engagement with the community.
Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, and 11 residents	**Access to public realm:** Need to be clearer about the need for public realm to be genuinely public.	Policies SP2, SP9, D2 and P7 provide guidance to delivery new high quality public realm and improve the existing public realm of North Acton.
Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, and 11 residents	**Fire resilience:** OPDC needs to reconsider its approach to tall buildings in light of the Grenfell Tower tragedy including considering fire risk and associated costs.	OPDC considers it appropriate to provide clarity regarding the role of Building Regulations and planning policy in delivering the highest standards of fire safety. Policy D4 has been amended to reflect Draft New London Plan policy D11 and Building Regulations requirements. This will be applied to all buildings including tall buildings.
Grand Union Alliance, Wells House Road Residents Association, and 11 residents	**Development capacity and resultant building heights:** Heights are driven by untested London Plan development capacities. This is demonstrated by tall buildings planned along Scrubs Lane. Rationale is not justified.	OPDC considers the homes and jobs targets for each place are justified. These are based on development capacity information set out in OPDC's Development Capacity Study. This has been developed in accordance with National Planning Practice Guidance for Housing and Economic Land Availability Assessments. The Development Capacity Study is based on development capacity information set out in the Old Oak North Development Framework Principles the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document

		and the Victoria Road and Old Oak Lane Framework Principles. Justification for tall buildings for Scrubs Lane is set out in the Scrubs Lane Development Framework Principles and reflected in OPDC's Tall Building Statement.
Historic England	**Designated heritage assets:** D8 should provide policy for how designated heritage assets will be considered rather than defer to the NPPF and national guidance. This will ensure accordance with NPPF paragraphs 9, 12 and 126.	The policy has been amended to include policy guidance for designated heritage assets.

6. Environment and Utilities

Who raised the issue	Summary of Issue	OPDC Response
London Borough of Hammersmith & Fulham, Grand Union Alliance, Wells House Road Residents Association and 11 residents	**Air quality:** There is a concern that the air quality policy is weak and ineffective As London Borough of Hammersmith & Fulham is an Air Quality Management Area under the 1995 Environment Act – Part IV, impacts of any development must be agreed with the Council.	The policy requiring Air Quality Assessments has been significantly strengthened to address stakeholder comments and to conform with Local Authority approaches to air quality if AQMAs.
Hammersmith Society, Wells House Road Residents Association and 11 residents	**Fire resilience:** Consultees supported policy EU8 (sustainable materials) but were concerned that the impacts of fire safety following the Grenfell tragedy should be reflected in the policy	This has now been addressed in Policy D4 which maximises buildings' resilience and fire safety in accordance with the latest Building Regulations and London Plan policies.
Grand Union Alliance, Wells House Road Residents Association and 11 residents	**Strengthen Green Space Factor:** Green Infrastructure and Open Space Strategy and Management Plan should adopt clearer strategy around Green Space Factor and Green Points system implementation	OPDC have been working with GLA to support adoption of the green Space Factor in the London Plan. Supplementary Planning Guidance is proposed by the Mayor to provide clarity around how this is to be adopted.
Hammersmith Society, Wells House Road Residents Association and 11 residents	**Light pollution:** Policy should consider impact of light pollution	This is now addressed in Policy D6 (Amenity) and Policy EU2. For residential uses, careful consideration will need to be given to the design and location of habitable rooms, including the location and design of bedrooms to mitigate light

Who raised the issue	Summary of Issue	OPDC Response
		pollution and consideration should be given to the impact of light pollution on biodiversity.

7. Transport

Who raised the issue	Summary of Issue	OPDC Response
Brent Cyclists, Grand Union Alliance, Hammersmith Society, Wells House Road Residents Association, London Borough of Hammersmith and Fulham, Park Royal Business Group, West Twyford Residents Association and 11 residents	**London Cycle Design Standards:** On network planning issues comments were made that there was insufficient explanation of how the LCDS would be applied.	The OPDC will invest in create new and improved routes and enhancing area wide cycle permeability. The LCDS will apply and this includes items such as segregation, gradients, and end of journey facilities. The Local Plan has been amended to state that the LCDS will apply to the creation of all cycle infrastructure.
Grand Union Alliance, Wells House Road Residents Association, CBRE, ArtWest, and 11 residents	**Parking restrictions**: There is a need to recognise the parking needs of businesses and industry and parking restrictions may not be appropriate to apply to this activity.	Whilst apply parking restrictions will be challenging the policy and supporting text recognise that in Park Royal, planning applications will be managed on a case by case basis.

8. Housing

Who raised the issue	Summary of Issue	OPDC Response
Old Oak Park Limited, Castlepride Limited Brent Council, Ealing Council, Harlesden Neighbourhood Forum; Harlesden Lets, Old Oak Interim Neighbourhood Forum, Grand Union Alliance, Crisis Brent, Wells House Road Residents Association, 13 residents	**Affordable housing target and tenure:** Developers have challenged whether the target is feasible given the need to fund infrastructure and the challenging local constraints on sites (i.e. contamination). The councils and community groups have also challenged the deliverability of the target, but also consider that the tenure split should require a greater proportion of LAR housing, to align with the need identified in OPDC's Strategic Housing Market Assessment for over 80% LAR.	The Mayor's draft new London Plan will require mayoral bodies, public land and land de-designated from SIL to achieve 50% affordable housing. A reduction in this overall strategic target would not be supported by the Mayor and it is therefore not proposed to change this. In accordance with the NPPF, OPDC has set out objectively assessed need (OAN) in the SHMA which has determined that there is a need for 1,200 homes within the redline boundary. Whilst the proposed tenure split in the Local Plan) does not directly marry up with the tenure requirements in the SHMA, the objectively assessed need in terms of tenure split is likely to be achieved due to

		the over delivery of housing above the objectively assessed need for 1,200 homes as demonstrated by the Development Capacity Study and phasing plan.
Old Oak Park Limited, Fruition Properties, Hammersmith Society, Wells House Road Residents Association, 13 residents	**Family housing:** Developers suggest the target will be challenging to achieve at high densities. Community groups also recognise the challenge of achieving the target at high densities, but want the target increased to 50% family housing to meet needs identified in OPDC's Strategic Housing Market Assessment.	Officers do not propose to increase the family housing target as it is recognised that the target will be challenging to achieve at high densities.
Royal Borough of Kensington & Chelsea	**Gypsy and Traveller Accommodation:** OPDC should assess the capacity to provide pitches to meet Gypsy and Traveller Accommodation need.	OPDC has provided an Addendum to the Gypsy and Traveller Accommodation Assessment and assessed that there is no capacity for sites to deliver additional pitches.

9. Employment

Who raised the issue	Summary of Issue	OPDC Response
SEGRO London Borough of Ealing	**Industrial intensification:** Requests for OPDC to be clearer about support for industrial intensification to ensure that Park Royal SIL can support the attainment of jobs targets	Wording in the Place and employment policies have been revised to provide clearer support for and requirements for industrial intensification and industrial Site Allocations have been incorporated into the Local Plan
ACAVA; Hammersmith Society; Wells House Road Residents Association; Grand Union Alliance;;London Borough of Brent; Hammersmith Society; Harlesden Lets, Wells House Road Residents Association; 13 residents	**Affordable workspace:** Requests for Local Plan to make a strong commitment and provide further detail on affordable workspace.	The Local Plan will continue to require an appropriate quantum of affordable workspace which would be assessed on a case by case basis. This provides flexibility to determine the most suitable approach. In addition to this, OPDC may provide more detail on implementing this policy through the preparation of an Affordable Workspace Supplementary Planning Document (SPD). An SPD could be updated more regularly than a Local Plan document

Who raised the issue	Summary of Issue	OPDC Response
Grand Union Alliance, Wells House Road Residents Association, GLA; SEGRO; Old Park Limited; and 13 residents	**Business relocations:** Community groups have expressed concerns about the impacts on jobs and business losses. There are requests for further clarity and detail on how business relocations would be managed and some questioning the requirements for this	Amendments have been made to the policy and supporting text to clarify arrangements to support co-location and manage the relocation of businesses
TITRA; Grand Union Alliance, Wells House Road Residents Association, 21 residents	**Waste sites:** Existing waste facilities, particularly Powerday, negatively impact on residential uses and should not remain in the area	The existing waste facilities safeguarded in the Local Plan are needed to help meet waste management needs in Hammersmith and Fulham, Brent and Ealing. The Local Plan seeks to ensure future proposals adequately mitigate their impact on amenity.
Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association; Ashia Centur Limited; Raban Goodhall Ltd; and 13 residents	**Further land should be de-designated from Strategic Industrial Location:** Request for additional sites/areas to be released from SIL or allowed to be to be developed for mixed-uses.	Additional work has been undertaken to assess whether additional changes to the SIL boundary are appropriate and in relation to the Twyford Tip (or Land at Abbey Road) site. Recommendations in the evidence base are reflected in the Local Plan.

10. Town Centre and Community Uses

Who raised the issue	Summary of Issue	OPDC Response
Brent Council, Grand Union Alliance, Wells House Road Residents Association and 11 residents.	**Impact Assessment:** the threshold of 5,000sqm for Impact Assessments within Old Oak Major town Centre should be reconsidered and revised down to the NPPF 2,500sqm threshold	The rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments. The Study has assessed the broad impact of a new centre on the surrounding town centre hierarchy and this has shown that most impacts are likely to be positive as a consequence of the ability of surrounding centres to capture spend from the new population moving to the area.

Who raised the issue	Summary of Issue	OPDC Response
Citrus Group and Fuller Smith & Turner Mayor of London, Hammersmith and Fulham Council, Grand Union Alliance, Wells House Road Residents Association and 11 residents.	**Pubs:** The policy is overly restrictive and repeats policies covered elsewhere or includes too specific or onerous policy requirements. Conversely, a number of stakeholders supported the current policy and strong protection of pubs.	Some amendments have been made to the policy to avoid repetition with other policies and to improve the flow of the policy, but the policy still seeks to protect pubs and requires appropriate marketing of the premises before the acceptability of another use would be considered.
Hammersmith and Fulham Council, Brent Council, Ealing Council, Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association and 11 residents	**Social infrastructure:** Requests for the policy to be strengthened with regard to protection of existing uses and support for new uses. Comments were also raised on the methodology and assumptions within the Education and Health Needs Study	Some amendments have been made to the social infrastructure policy (TCC4) to strengthen requirements for protection and support for new social infrastructure. The Education and Health Needs Study has been superseded by the Social Infrastructure Needs Study which, where appropriate, addresses the comments made on this study
Sport England, Hammersmith and Fulham Council, Grand Union Alliance, Wells House Road Residents Association and 11 residents	**Sports facilities and playing fields:** Amendments to the policy were suggested to give stronger protection to existing facilities, to align more closely to the NPPF and for playing fields to be appropriately addressed in the policy.	The policy has been amended to more closely align with the NPPF and give stronger protection to existing facilities. The policy has also been revised to address the need for playing fields.
Mayor of London, Brent Council, Grand Union Alliance, Wells House Road Residents Association and 11 residents	**Town centre uses and A-Class uses:** Suggestions that the policies for town centre uses (TCC1) and A-class uses (TCC3) should be amended to ensure strands relating to town centre uses are all covered within TCC1 and that the policy ensures significant adverse impacts to surrounding centres are appropriately mitigated and to ensure that town centre uses within SIL are being appropriately managed.	The policies have been re-ordered so that the strands previously in TCC3 and in the places chapter are now all covered within TCC1. The policy lead in text for TCC1 has been amended to clarify that the strands of the policy are working to the aim of avoiding significant adverse impacts to surrounding centres. The policy regarding town centre uses within SIL has also been appropriately amended.
Grand Union Alliance, Harlesden Neighbourhood Forum, Wells House Road Residents Association and 11 residents.	**Cumulative Impacts:** The policy should be revised to state that development proposals should not have an unacceptable impact, either by themselves of cumulatively with other developments, upon existing town centres	While it was part of PPS4, the NPPF doesn't have a cumulative impact test, requiring schemes below locally set impact assessment thresholds to submit impact assessments. There's a

Who raised the issue	Summary of Issue	OPDC Response
		requirement for schemes over the default threshold to take account of cumulative developments in testing impact, but if the scheme is under the threshold in the first place, there is no cumulative trigger for undertaking an assessment. An addendum has been added to the Retail and Leisure Needs Study to clarify national policy in this respect.

11. Delivery and Implementation

Who raised the issue	Summary of Issue	OPDC Response
Castlepride Ltd and Segro.	**Balancing priorities:** Need to recognise site specific constraints and constraints affecting development feasibility and viability and other 'non infrastructure' planning obligations when considering the implementation of the Local Plan.	This has been included in the policy, but text has also been inserted into the supporting text to clarify that site specific constraints such as land contamination should impact land values and that the costs for addressing these issues should not necessarily be borne through reduced planning obligations or sustainability standards, in accordance with the Mayor's Affordable Housing and Viability SPG.
Grand Union Alliance, Hammersmith Society, Wells House Road Residents Association and 11 residents	**Viability:** There is no clear approach to addressing the funding gap and the implementation of the Local Plan is therefore compromised.	Policy DI1 sets out the expectation that there would need to be a balance between different priorities. As outlined in the policy and supporting text, OPDC are investigating many avenues for the funding of infrastructure and is not placing an over-reliance on developer contributions.
Old Oak Park Limited	Concerns have also been raised about the viability of delivering the affordable housing and employment policies.	The Whole Plan Viability Study, included in the evidence base, has assessed all the Local Plan policies to identify those policies likely to impact on development viability, such as affordable housing, infrastructure (including Community Infrastructure Levy), environmental standards,

Who raised the issue	Summary of Issue	OPDC Response
		open space requirements and employment policies (including affordable workspace and commercial floorspace at Old Oak Common Station). The conclusion of the Whole Plan Viability Study is that in the round, the polices contained in the Local Plan would be viable.
Old Oak Interim Forum, Grand Union Alliance, Wells House Road Residents Association and 11 residents	**Community Engagement:** Policy DI3 is not sound because OPDC has not upheld its Statement of Community Involvement (SCI), appropriately engaged with community groups and did not designate the Old Oak Neighbourhood Area as submitted.	Policy DI3 is a high level policy dealing with engagement with all stakeholders - not just community groups. Detailed arrangements for engagement with residents and community groups are set out in OPDC's SCI, but Policy DI3 does set out that OPDC will keep this document under regular review. Details on OPDC's consideration of the appropriateness of the neighbourhood area can be found on OPDC's website at: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/planning-old-o-10

Appendix F: List of all Issues Raised and Officer Responses at Regulation 19 1st Stage

Issues raised by representations on the Regulation 19(1) revised draft Local Plan and how these have been dealt with in the Regulation 19(2) second revised draft Local Plan

The below provides an overview of the issues raised on the Regulation 19(1) revised draft Local Plan. This appendix accords with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 17d) parts (iii) and (iv). This section has been ordered in accordance with the Regulation 19(1) revised draft Local Plan, dealing with issues in the following order:

1. General issues and the introduction chapter
2. Spatial vision
3. Strategic policies chapter
4. Places chapter
5. Design chapter
6. Environment and utilities chapter
7. Transport chapter
8. Housing chapter
9. Employment chapter
10. Town centre and community uses chapter
11. Delivery and implementation chapter
12. Glossary
13. Appendix: Background and context
14. Supporting studies including the Integrated Impact Assessment (IIA)

The following tables include 5 columns:

1. provides a unique comment reference, which corresponds, where appropriate to the comment references highlighting changes made in response to comments in the track changed copy of the 2nd Regulation draft Local Plan.
2. provides details on which chapter, policy, figure, table, paragraph or supporting study the comment relates to.
3. provides a summary of the issue raised on the Regulation 19(1) Local Plan.
4. identifies how many stakeholders raised the issue.
5. identifies the names of the stakeholders who raised the issue.
6. identifies OPDC's response to the comment. The response is precluded by either 'no change proposed', 'change proposed' or 'noted' and is followed, where relevant and appropriate, with an explanation of the response and/or the approach OPDC has taken to addressing the comment.

1. General issues and the introduction chapter

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
G1	General	Local Plan should have strategy for areas outside of its boundary	1	A. Anderson	No change proposed. OPDC is not the planning authority for areas outside of its boundary; however, as identified in the supporting text (para 3.8) to Policy SP1, OPDC is working positively with the surrounding local planning authorities to ensure development and growth within the OPDC complements other areas of growth and that regeneration brings economic benefits to surrounding communities.
G2	General	Consider the plan as whole to be sound, positively prepared and legally compliant	3	Culinary Quarter (London) Ltd, Association for Consultancy and Engineering (ACE), Environment Agency	Noted
G3	General	Broadly support the aims and aspirations of the Local Plan	11	HS2 Ltd, Osbourne Investments Limited and Quattro Holdings Limited, Fairview Estates (Housing) ltd, Mayor of London, Association for Consultancy and Engineering (ACE), Tim Potter, Royal Borough of Kensington and Chelsea, Environment Agency, Health and Wellbeing Board - London Borough of	Noted

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Ealing, Hammersmith and Fulham Council, ArtWest, TfL Commercial Development	
G4	General	The Plan needs to set out an approach that delivers real benefits and does not simply financialise land and provide developers with profit	2	Professional Land Research Group and Coalition for Economic Justice, Regent's Network	No change proposed. OPDC considers that the policies in the Local Plan support the sustainable regeneration and redevelopment of the area. OPDC would expect developers to make an appropriate level of profit, to incentivise development, but viability assessments will be used to ensure that developers are making appropriate contributions towards the delivery of affordable housing and infrastructure.
G5	General	The plan's figures are below those set out in the London Plan, but the Local Plan does identify that the overall capacity is in line with the London Plan targets but that some of this falls outside of the Plan period.	1	Mayor of London	Noted.
G6	General	Should consider developing some early improvement strategies for key early phases such as along Old Oak Lane.	1	Health and Wellbeing Board - London Borough of Ealing	No change proposed. OPDC's Local Plan is supported by a Development Capacity Study, which has been undertaken in accordance with NPPG guidance. This shows the sites capable of being delivered in the next 0-5 and 5-10 years. OPDC will secure appropriate contributions from developments towards improvements in these locations. OPDC have

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					also secured funding from the Great Places Scheme which is looking to support early culture and community based place-making initiatives in these locations.
G7	General	The Plan has failed to address the needs of the disabled and elderly	1	Friary Park Preservation Group	No change proposed. The Local Plan includes a wide range of policies seeking to address the needs of the disabled and elderly. This includes Policies SP9 and D3 which requires development to be accessible and inclusive, Policy H3 which requires 10% of homes to meet M4(3) Building Regulations and Policy H9 which supports the provision of specialist housing.
G8	General	The online survey questions on the soundness of the plan were difficult to respond to. Do not understand what terms like 'legally compliant' means.	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The online survey followed a similar format to other online surveys. The criticism relates to the use of the words such as 'justified', 'sound', 'legally compliant' and 'positively prepared'. These terms were defined on OPDC's website and as part of leaflet consultation material and presentations at drop-in sessions also clarified what was meant be these terms. Government publications and websites also provide clarity on what is meant by these terms.
G9	General	Disappointed by the lack of vision and creativity in the plan.	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. OPDC considers that the Local Plan strike an appropriate balance between being aspirational and visionary, but also being deliverable, as required by the NPPF.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
G10	General	The strategic targets set for the area in the London Plan will result in an unsuccessful urban environment	1	St Quintin and Woodlands Neighbourhood Forum	No change proposed. The London Plan targets underwent their own examination as part of the London Plan. OPDC has also undertaken a Development Capacity Study in support of the Local Plan, which was undertaken in accordance with NPPG targets and which shows the target to be achievable, albeit not wholly within the next 20 years covered by the Local Plan
G11	General	Do not consider that the Local Plan is clear and transparent as required by the NPPF	1	St Quintin and Woodlands Neighbourhood Forum	Noted. OPDC considers the document to be generally clear and transparent but has taken on board some of the suggested revisions to make the document clearer and more transparent, where it was felt that this was necessary.
G12	General	OPDC has been using the emerging Local Plan to assess and determine planning applications, beyond the level intended by the NPPF	1	St Quintin and Woodlands Neighbourhood Forum	Noted. Officers have given the emerging Local Plan the appropriate material weight in accordance with the NPPG on Local Plans (ID: 12-019-20140306)
G13	General	Need to learn from the mistakes of other Mayoral Development Corporations and other Opportunity Areas	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted. Lessons have been learnt from other major regeneration projects in the development of the Local Plan. The Local Plan is supported by a Precedents Study which includes some of these lessons.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
G14	General	Given the global and UK economic climate there is no certainty that the homes and jobs targets will be realised and there are no contingency plans if they are not.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's Local Plan is supported by Key Performance Indicators and if as a result of changing economic conditions, policies and targets in the Local Plan are not being delivered, this would trigger a review of the relevant policy.
G15	General	There has been a recent lack of community engagement by OPDC due to staff absences and this has hindered communities' ability to respond to the Local Plan and other OPDC matters	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Officers undertook a lengthy consultation exercise as part of the public consultation on the Regulation 19 Local Plan. The document was consulted on for 11 weeks - well in excess of the 6 week requirement outlined in OPDC's Statement of Community Involvement. OPDC also offered extensions to the consultation to consultees who requested an extension. Officers hosted 6x1.5 hour drop-in sessions, consisting of a presentation and question and answer session. Officers also hosted two live Twitter sessions. Prior to consultation, officers also hosted two

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					presentation events, to provide community groups with an overview of the results and key changes resulting from the Regulation 18 consultation and to inform stakeholders of the content of the Regulation 19 Local Plan and how stakeholders should respond to the consultation. During the consultation, emails to OPDC officers were responded to as soon as was practicable. The consultation activities associated with the Regulation 19 Local Plan exceeded nationally set requirements and OPDC's own Statement of Community Involvement requirements. Further details on OPDC's engagement activities in respect of the Local Plan can be found elsewhere in this Statement of Consultation document.
G16	General	Until the HS2 station has been designed and the Old Oak masterplan has concluded, the Plan should be found unsound	14	Hammersmith Society, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Outputs from the Old Oak Masterplan in the form of the Old Oak North Masterplan Framework Principles document have been used to appropriately update the policies in the Local plan. The HS2 proposals are to a certain degree governed by the High Speed Rail (London-West Midlands) Act (2017). For those elements not controlled through the Act and which are controlled through Schedule 17 or other subsequent applications for development or connections around the station, it is important that OPDC takes a plan-led approach and sets out clear

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					policy guidance on how the area should be developed, in accordance with the NPPF.
G17	General	Applications have been approved with excessive densities in spite of objections from communities	15	Hammersmith Society, Old Oak Interim Forum, Regent's Network, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Issues raised in relation to planning applications were considered in relation to each respective planning application and are not a matter for the Local Plan examination.
G18	General	The plan lacks a strong overall development management policy	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. It is not clear what is meant by this statement as the Local Plan includes a substantial number of development management policies. Therefore, no changes have been made to the Local Plan that directly relate to this issue.
G19	General	Support the inclusion of scales on figures	1	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
G20	General	All transport proposals in the Local Plan are depicted by illustrative sketch diagrams, and don't provide details of existing transport infrastructure of how proposed infrastructure will fit into available space.	1	West Twyford Residents Association	No change proposed. There are a number of figures in the Local Plan that depict the existing transport infrastructure. Figures showing new transport infrastructure are included in illustrative sketch diagrams because in most instances, the exact locations for their provision have not yet been fixed. This even includes the exact shape of the HS2/Elizabeth line station at Old Oak Common, although the HS2 safeguarding is included in the Policies Map.
G21	General	Little has changed from the first draft Local Plan to the revised draft Local Plan. OPDC has generally ignored or dismissed comments from the local community and residents	14	Old Oak Interim Forum, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Substantial changes were made from the 1st draft to the 2nd draft in response to points made by local community groups. This includes, inter alia, identifying two new 'places', identifying a neighbourhood town centre for Atlas Junction and setting clearer policy targets for open space provision and social infrastructure provision. OPDC's Statement of Consultation sets out the various changes made to the Local Plan from 1st to 2nd draft in response to community group comments.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
G22	General	There is a significant gap between the rhetoric in the vision and the reality of what has been and what will be delivered over the plan period.	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Officers consider that the Local Plan is positively prepared and is realistic and deliverable.
G23	General	The Reg 19 Local Plan has been consulted on in advance of the new London Plan, which may revise Londonwide targets downwards	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The New London Plan has been published and this has identified an increased target for OPDC during the first ten years of the new London Plan. This new target has been appropriately reflected in revisions to the submission draft Local Plan.
G24	General	The Old Oak Masterplan will further test capacity and this is likely to identify the repercussions of the densities and revise figures downwards.	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	Change proposed. The Old Oak North Masterplan Framework Principles has further tested development capacity. These revised figures have been included in the updated Local Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
G25	General	Cargiant have reduced their densities and this has resulted in densities going up elsewhere	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Cargiant may have reduced their densities but this has had no bearing on OPDC's Development Capacity Study figures for elsewhere and has not resulted in densities increasing elsewhere in Old Oak.
G26	General	Applications have been approved in advance of the Local Plan being published meaning decisions have not been plan led.	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The NPPF requires applications that accord with the Development Plan to be approved without delay. The London Plan forms part of OPDC's Development Plan, which includes a number of policies against which proposals can be and have been assessed. OPDC's emerging Local Plan also has material weight and as part of the consideration of planning applications, the material weight of the Local Plan has been applied in accordance with NPPG guidance on Local Plans.
G27	General	Originally supported the development of the area but has changed their mind	1	Regent's Network	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
G28	General	Do not support the use of infographics between chapters	1	Regent's Network	No change proposed. OPDC considers that the use of infographics between the chapters aids navigation and the enjoyment of the Local Plan and is not proposing to remove these.
G29	General	Should consider the opportunity to bring the Stamford Brook and Counters Creek lost rivers back to the surface.	1	Regent's Network	No change proposed. OPDC supports the provision of water space as part of the green infrastructure network; however, Counters Creek and Stamford Brook are part of the sewage network and consequently, it would be undesirable for them to be brought to the surface.
G30	General	Should not refer to or have precedents in the Local Plan and the word 'precedent' should be removed from the Local Plan	1	Regent's Network	No change proposed. OPDC considers that the precedents aid with the understanding of OPDC's objectives for the area and aid with the transparency and comprehension of the Local Plan.
G31	General	Is not clear to whom consultation responses should have been targeted	1	Regent's Network	Noted. The consultation material included details on where consultation responses should have been addressed. OPDC has not received any complaints from others regarding this not being clear and comments from the Regent's Network were received via the email address that consultation material identified that comments should be sent to.
G32	General	Aspects of Brent's Regeneration Strategy should be included in the proposed development	1	Harlesden Lets	No change proposed. Relevant elements have been incorporated into evidence in support of the Local Plan and where relevant, in Local Plan policy guidance.
G33	General	The plan is long, detailed and onerous, making	1	Old Oak Park Ltd	Change proposed. OPDC considers that the Plan strikes an appropriate balance in the level

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		development more burdensome when it should be more streamlined.			of detail it provides, but revisions to try and simplify the Plan have been made where necessary and appropriate. However, OPDC does consider that the Old Oak and Park Royal area is relatively unique in the scale of development envisaged in a relatively small area and by consequence, there is a need for greater detail to be provided in certain circumstances, to support an integrated, comprehensive, optimised and timely approach to the redevelopment and regeneration of the area.
G34	General	The Plan strays into seeking to control areas it should not, such as meanwhile uses, relocating tenants, wages paid to tenants, subsiding business and retail space, control of workspace operators, distribution of residential unit mixes, provision of utilities and the life cycle of materials. these matters are not necessary for the sustainable development of the area	1	Old Oak Park Ltd	No change proposed. Meanwhile uses are dealt with in many other Local Plans. OPDC wants to support the provision of meanwhile uses in the area. The Plan does not require tenants to be relocated, but does require developers to engage with their current businesses and seek to provide units that could enable tenants to relocate. The London Living Wage is an important mayoral priority and OPDC has made edits to clarify that the requirement for London Living Wages to be achieved will be added as an informative to planning decisions. The Local Plan does not seek to subsidise retail space. Affordable workspace is a common policy for Local Plans to include where a local need exists. Equally, residential unit mixes are a common policy requirement, to ensure needs are met. Utilities

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					infrastructure is required to support the sustainable development of the area and sustainable use of materials and resources are equally important to support and uphold the sustainable regeneration of the area. OPDC considers that all these policies are consistent with the NPPF and in general conformity with the London Plan and are therefore sound.
G35	General	Concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and HS2	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This issue does not relate to the Local Plan but to separate OPDC corporate activities.
G36	General	The plan is not sound because it has not adequately assessed decontamination costs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Impacts of contamination costs were assessed in OPDC's Affordable Housing Viability Assessment on the basis of £380,000 per hectare. This has been based on a desktop assessment undertaken as part of the DIFS and the application of a standardised remediation rate. The contamination costs on individual sites are likely to vary significantly and can only be fully understood once detailed site surveys and intrusion works have been undertaken. This would occur when development is brought forward and in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					accordance with Policy DI1, site specific constraints will be considered as a factor in determining viability and although the presence of abnormal site constraints is expected to impact land value, the cost should not necessarily be born through a reduction in planning obligations
G37	General	Support organisation of workshops during consultation	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
G38	General	Should consider producing a shorter term plan to cover 10 years	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The NPPF requires Local Plans to cover a minimum of 15 years. OPDC has opted to produce a Local Plan to cover 20 years to broadly align with the Mayor's London Plan, which also covers 20 years. As a corporation, OPDC is developing shorter term strategies for the early regeneration of the area which are being published. OPDC's planned Scrubs Lane SPD is also a shorter term policy guidance document for this part of the Old Oak area,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					which will undergo redevelopment in the short to medium term.
G39	General	OPDC has not communicated via printed newsletters recently - older people need regular printed information	1	Mark Walker	No change proposed. The Regulation 19 Local Plan was publicised by a newsletter. A copy of this can be found in OPDC's Statement of Consultation.
G40	General	Concern that communities have not been properly consulted or engaged in respect of planning applications	1	Mark Walker	No change proposed. This issue does not relate directly to the Local Plan. Engagement on planning applications has accorded with national requirements.
G41	General	The engagement on the Local Plan has not been adequate for the Reg 19 draft, with presentation sessions and limited time for Q and As	15	Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Officers undertook a lengthy consultation exercise as part of the public consultation on the Regulation 19 Local Plan. The document was consulted on for 11 weeks - well in excess of the 6 week requirement outlined in OPDC's Statement of Community Involvement. OPDC also offered extensions to the consultation to consultees who requested an extension. Officers hosted 6x1.5 hour drop-in sessions, consisting of a presentation and question and answer session. Officers also hosted two live Twitter sessions. Prior to consultation, officers also hosted two presentation events, to provide community groups with an overview of the results and key changes resulting from the Regulation 18 consultation and to inform stakeholders of the content of the Regulation 19 Local Plan and how stakeholders should respond to the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					consultation. During the consultation, emails to OPDC officers were responded to as soon as was practicable. The consultation activities associated with the Regulation 19 Local Plan exceeded nationally set requirements and OPDC's own Statement of Community Involvement requirements. Further details on OPDC's engagement activities in respect of the Local Plan can be found elsewhere in this Statement of Consultation document.
G42	General	The Mayor's Review of OPDC calls into question how infrastructure will be funded, how levels of affordable housing will be achieved and can this be achieved at appropriate densities	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Since the publication of the mayoral review, OPDC has been undertaking a series of activities to address the issues raised. OPDC reports to every Board meeting updating on progress against the mayoral review outcomes. OPDC's Local Plan is supported by a Whole Plan Viability Study and Affordable Housing Viability Assessment which assesses the viability of development in planning terms. OPDC recognises in Policy DI1 that not all infrastructure will be funded by Section 106 and CIL contributions and OPDC is proactively looking at alternative funding sources.
G43	General	Engagement on Reg 19 Local Plan has been inadequate because it ran through the summer and limited engagement took place	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. Officers undertook a lengthy consultation exercise as part of the public consultation on the Regulation 19 Local Plan. The document was consulted on for 11 weeks - well in excess of the 6 week requirement outlined in OPDC's Statement of

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Community Involvement. This extended consultation was to take account of the fact that the document was being consulted on during the summer. OPDC also offered extensions to the consultation to consultees who requested an extension. Officers hosted 6x1.5 hour drop-in sessions, consisting of a presentation and question and answer session. Officers also hosted two live Twitter sessions. Prior to consultation, officers also hosted two presentation events, to provide community groups with an overview of the results and key changes resulting from the Regulation 18 consultation and to inform stakeholders of the content of the Regualtion 19 Local Plan and how stakeholders should respond to the consultation. During the consultation, emails to OPDC officers were responded to as soon as was practicable. The consultation activities associated with the Regulation 19 Local Plan exceeded nationally set requirements and OPDC's own Statement of Community Involvement requirements. Further details on OPDC's engagement activities in respect of the Local Plan can be found elsewhere in this Statement of Consultation document.
G44	General	Profits from developers and the development of the public sector land should be used to address the significant dis-	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The use of profits from developments on public sector land is not a matter that needs to be set out in the Local Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		benefits which displaced businesses, enterprises and impacted residents will experience		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
G45	General	OPDC should maintain a public land property register	1	Pentecostal City Mission	No change proposed. Details of land ownership can be obtained from the land registry. The need for OPDC to hold such information is not a matter that needs to be dealt with as part of the Local Plan
G46	General	Hythe Road and Old Oak Common Lane Stations are not yet committed and so should be referred to as "potential stations".	1	Transport for London (Group Planning)	Change proposed. References to the Hythe Road and Old Oak Common Lane Overground Stations will be referred to as proposed stations here and throughout the Local Plan.
G47	General	Support the Friends of Wormwood Scrubs submissions	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
G48	General	Oppose description of Old Oak as "one London's most inaccessible areas".	1	Robert Covell	No change proposed. This is quoting OPDC's corporate objectives. Figure 7.10 in the transport chapter shows that parts of the OPDC area are within the most inaccessible locations in London, having a PTAL of 0.
G49	Para 1.22	Planning Policy cannot be used to impose requirements on HS2 Station design or works beyond that set out in the HS2 Act	1	HS2 Ltd	Noted. The requirements of the London - West Midlands Act are set out in the Introduction chapter and in the Old Oak Common Station cluster.
G50	Para 1.21	Support chapters 3,4 and 11 being considered strategic policies for neighbourhood planning purposes	1	Transport for London	Noted.
G51	Para 1.21	Disagree that the Local Plan should set out which are and which are not strategic policies. Particularly disagree with the place policies as being strategic policies	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
G52	Para 1.23	It is not clear from the Local Plan or from Schedule 17 of the HS2 Act how the structural design of the Old Oak Common station will be decided upon.	1	West London Line Group	Noted. Schedule 17 matters relate mostly to the external appearance of proposals and their impacts on the surrounding context. Matters relating to the structural design are governed through the High Speed Rail (London- West Midlands) Act (2017). The station design will be carried out in accordance with HS2 technical standards, supplemented by British standards, Eurocodes and Network Rail standards. HS2's consultants will demonstrate and validate the design through the technical assurance process and will certify the design for the acceptance of HS2.

2. Spatial Vision

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SV1	Spatial Vision	Development should create an inclusive, thoughtfully designed green community	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. These aspirations are embedded within the spatial vision.
SV2	Spatial Vision	The Plan needs to address how to balance global city development values with local neighbourhood aspirations	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The spatial vision recognises the local aspirations and role the area can play at a more strategic level on the 'thinking big' and 'going local' narratives.
SV3	Opportunities and challenges	The plan does not mention the negative aspects of early delivery such as there being current unpleasant uses that will not support good policy outcomes and causes	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. The impacts of delivery and construction are both recognised as key challenges in the opportunities and challenges element of the spatial vision. Individual applications are considered against relevant development plan policies. If proposals do not

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		questionable living conditions for new residents		Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	adequately mitigate impacts of current uses, they would be refused planning permission.
SV4	Spatial Vision	Agree that the plan should have national and local ambitions, but have concerns about the realisation of these ambitions. At the same, time, the plan is not ambitious enough	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the plan strikes the right balance between ambitious and aspiration, but at the same time deliverable.
SV5	Figure 2.2	Twyford Abbey Road open space should be depicted as a residential area.	1	Deloitte LLP (on behalf of Diageo)	No change proposed. The identified area is publicly accessible open space and it is not appropriate to identify it as a residential area.
SV6	Narrative 9	Support inclusion of Grand Union Canal as environmental and heritage asset to be conserved and enhanced.	1	The Inland Waterways Association-Middlesex Branch	Noted.
SV7	Figure 2.1	The challenge of high density development should specifically mention protecting the Grand Union Canal.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers the section of Higher Density Development within figure 2.1 should provide broad descriptions of the potential impacts related to high density development. Detailed points about high density development and impacts on the Grand Union

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Canal are picked up in the Grand Union Canal place policy.
SV8	Figure 2.1	Provide reference to Healthy Streets approach.	1	Transport for London (Group Planning)	Change proposed. Healthy Streets has been included under the Health and Wellbeing section of figure 2.1.
SV9	Figure 2.1	Reference to MTS mode share targets and traffic reduction strategies to help minimise the use of private car should be made.	1	Transport for London (Group Planning)	Change proposed. References to mode share targets and traffic reduction strategies have been added to the Transit Orientated Development section of figure 2.1.
SV10	Spatial Vision	Spatial Vision narrative is unsound (no reason given why not)	1	Bernie Timmins	No change proposed. OPDC considers this narrative to be sound.
SV11	Narrative 9	Spatial Vision narrative on environmental and heritage assets is unsound	1	Bernie Timmins	No change proposed. OPDC considers this narrative to be sound.
SV12	Narrative 15	Spatial Vision narrative on day-to-day quality of life is unsound	1	Bernie Timmins	No change proposed. OPDC considers this narrative to be sound.
SV13	Spatial Vision	Support Spatial Vision's specific reference to excellence in health and wellbeing.	1	Sport England	Noted.
SV14	Spatial Vision	General support for spatial vision	20	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis, Old Oak Park Limited, Fruition Properties, Chris Billington, A Somefun,	Noted.

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hammersmith Society, Harlesden Lets, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SV15	Figure 2.1	Should note the benefits of a new bridge link connection Willesden Junction Station to EMR site.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. OPDC considers that figure 2.1 should provide broad descriptions of the opportunities and challenges in delivering the spatial vision. Policy P11 sets out the connectivity benefits for a bridge connecting Old Oak North to Willesden Junction.
SV16	Figure 2.1	Support reference to enhanced access to Wormwood Scrubs for all Londoners.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
SV17	Figure 2.1	Section should highlight the opportunities for early delivery across the area.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Change proposed. Text has been added to the end of the final sentence of the Place Making section of figure 2.1.
SV18	Spatial Vision	Agree that area is nationally important and connected location and high standards in sustainability and design	1	Association for Consultancy and Engineering (ACE)	Noted.

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SV19	Figure 2.1	Decision on Elizabeth Line Depot will affect adjacent delivery sites. This should be acknowledged as a challenge. Plan does not identify solutions for managing construction	1	Old Oak Park Limited	No change proposed. The challenges relating to development of the Elizabeth Line Depot are set out until the Deliverability section of figure 2.1. Managing construction is dealt with through a series of policies in the Local Plan, including SP10, T8 and EU7 and EU8.
SV20	Narrative 13	Include explicit reference to integrate with the Kensal Canalside Opportunity Area immediately to the East of the OPDC or a reference to link to, “new and existing local communities and neighbourhoods in the surrounding areas…”	1	Royal Borough of Kensington and Chelsea	Change proposed. Narrative 13 has been amended.
SV21	Spatial Vision	Welcome ambitious vision. References to ‘High quality’ should be given strong definition in policies, measurable specific targets, and relevant key performance indicators to clarify OPDC’s expectations, and to define what ‘success’ will look like.	1	Environment Agency	No change proposed. Policy SP9 defines what the highest design quality should comprise. Relevant elements of this policy are reflected in the Local Plan Key Performance Indicators.
SV22	Spatial Vision	Supports the OPDC’s acknowledgements about the Park Royal Industrial Estate	1	Segro	Noted.
SV23	Spatial Vision	Supports the distinctive roles of Park Royal and Old Oak in	1	Segro	Noted.

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		achieving this in delivering high density and mixed use community			
SV24	Narrative 4	Spatial Vision narrative 4 is sound.	2	Darren Milne, Kevin Early	Noted.
SV25	Spatial Vision	Too many hot food takeaway shops are having a detrimental effect on health of pupils.	1	Ark Burlington danes Academy	Noted. Policy TCC2 provides guidance for managing hot food takeaways
SV26	Narrative 1	Spatial Vision narrative 1 is sound.	1	Kevin Early	Noted.
SV27	Narrative 10	Spatial Vision narrative 10 is sound.	1	Kevin Early	Noted.
SV28	Spatial Vision	Spatial vision is legally compliant and complies with Duty to Cooperate requirement.	1	Torquil Law	Noted.
SV29	Spatial Vision	Spatial vision is positively prepared and legally compliant. (No justification provided)	1	Raymond Gill	Noted.
SV30	Spatial Vision	Spatial Vision is not effective due to the lack of emphasis on people.	1	Friary Park Preservation Group	No change proposed. OPDC considers that the Spatial Vision and 'Going Local' narratives provide appropriate focus on improving life changes, fairness and day to day quality of life for local people.
SV31	Narrative 9	Spatial Vision narrative 9 is unsound	2	Friary Park Preservation Group, Sarah Abrahart	No change proposed. OPDC considers this narrative to be sound.

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SV32	Narrative 11	Lack of precise information on the funding of new homes makes this narrative unsound	1	Friary Park Preservation Group	No change proposed. It is not considered appropriate to provide specific clarity on funding arrangements for the delivery of housing here. Funding of housing is provided via a wide variety of sources and it is not the role of the spatial vision to set these out.
SV33	Narrative 12	Spatial Vision narrative is unsound due to the reliance on flawed, conventional, economic forecasting.	1	Friary Park Preservation Group	No change proposed. OPDC considers this narrative to be sound based on robust economic evidence base provided in the Whole Plan Viability Assessment.
SV34	Narrative 13	Spatial Vision narrative 13 is not effective	1	Friary Park Preservation Group	No change proposed. OPDC consider this narrative to be effective.
SV35	Narrative 14	Spatial Vision narrative for life chances and fairness is excessively positive and unsound.	1	Friary Park Preservation Group	No change proposed. OPDC consider this narrative to be sound.
SV36	Narrative 6	We are a local school who have done a lot of work to improve the health of pupils. New development in the area should not undermine this.	1	West Twyford Primary School	Noted.
SV37	Narrative 1	High quality design that lasts and ages well is important.	1	A Somefun	Noted.
SV38	Narrative 5	Concerns about ecological affects on Wormwood Scrubs if access is not suitably controlled.	1	Chloe Fremantle	Noted. Policies related to Wormwood Scrubs are provided in P12. Policies relating to managing the natural environment are provided in Policy SP8 and in the Environment and Utilities Chapter.

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SV39	Narrative 5	Wormwood Scrubs to be excluded from the OPDC area.	1	Sarah Abrahart	No change proposed. Wormwood Scrubs was included in the OPDC boundary on designation of the Corporation on 1 April 2015.
SV40	Narrative 10	Spatial Vision narrative 10 is unsound.	1	Sarah Abrahart	No change proposed. OPDC considers this narrative to be sound.
SV41	Spatial Vision	Spatial Vision should refer to Park Royal as destination.	1	David Craine	No change proposed. Narrative 3 identifies the whole of the OPDC area to be a destination for London and the UK.
SV42	Narrative 3	Transport hub should be a place they want to go and not just pass through.	1	David Craine	Noted. Policies SP1 and P1C1 reflects this aspiration.
SV43	Narrative 11	New homes should be affordable to local people.	1	David Craine	Noted. Policy H1 sets out that OPDC will work with developers to ensure that wherever possible homes delivered are marketed to and occupied by people who live and work in London. OPDC also has an Affordable Housing Nominations policy for affordable rented and intermediate homes, that prioritises allocations to local people.
SV44	Narrative 12	Local people should have a tangible sense of benefiting from new development.	1	David Craine	Noted. Narrative 12 sets this aspiration to be delivered through the policies of the Local Plan.
SV45	Narrative 13	Spatial Vision will the help to mitigate risk of local people feeling disconnected from new development.	1	David Craine	Noted.
SV46	Spatial Vision	Support vision, but densities should not necessarily be high density	1	ArtWest	No change proposed. To deliver the development targets set out in the London Plan development within Old Oak and Park Royal will need to be high density. London Plan and Local

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Plan policies provide guidance to ensure high density development is high quality.
SV47	Spatial Vision	Need to balance protection of existing facilities and land uses, and delivery of housing, employment, social infrastructure, green space and amenities to serve local needs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policies SP4, H5, E1, EU1 and TCC4 provide guidance for protecting and managing existing land uses and facilities. This is appropriately reflected in the Spatial Vision Narratives.
SV48	Spatial Vision	The plan should push best practice in sustainability	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Spatial Vision seeks to pioneer international excellence in sustainability and this is reflected through a series of policies in the Local Plan.
SV49	Spatial Vision	Alternative Vision and Objectives suggested by the Hammersmith Society is still relevant	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	Noted. The Community-led vision and objectives submitted with the Regulation 18 consultation responses have been embedded within the amended Spatial Vision, narratives and policies.

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SV50	Spatial Vision	Need to provide for a diverse mix and pioneer rather than be a continuation of things that have gone before	1	Harlesden Lets	Noted. The Spatial Vision seeks to ensure the OPDC area will be home to a diverse mix of uses, places and people that pioneers international excellence.
SV51	Spatial Vision	Residential figures have increased, there is less open space and high densities.	1	Regents Network	No change proposed. Residential development capacity has been identified using National Planning Practice Guidance methodologies. This is also accompanied by increased open space requirements of 30% of developable land outside of SIL to be delivered as publicly acccessible open space.
SV52	Spatial Vision	Cannot define any part of the area as a neighbourhood as it will be dominated by mega development with no sense of community.	1	Regents Network	No change proposed. London Plan and Local Plan policies provide guidance to ensure the deliver of Lifetime Neighbourhoods and a high quality built environment.
SV53	Figure 2.2	Westway Circus station should be shown on this map	1	West London Line Group	No change proposed. Figure 2.2 depicts existing stations and proposed new stations within the OPDC area. As such OPDC considers its inclusion would not be appropriate.
SC54	Spatial Vision	The 'thinking big' and 'going local' narratives are inherently conflicted with one another	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. OPDC considers the two scales of narratives complement each other. This is reflected in the IIA.

	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

3. Strategic policies

General comment

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP0	ALL	Support the Strategic policies	1	Association for Consultancy and Engineering (ACE)	Noted.

Strategic Policy SP1: Catalyst for Growth

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP1/1	SP1	Support policy SP1	4	Imperial College, T.A.S.B. Investments Ltd, Association for Consultancy and Engineering (ACE), Hammersmith and Fulham Council	Noted.
SP1/2	SP1, Para 3.8	Support para 3.8	3	Imperial College, Hammersmith and Fulham Council, ArtWest	Noted.
SP1/3	SP1, Figure 3.1	Need to amend the figure to change the label of the line to Watford from 'West London Line' to 'London Overground'	1	Transport for London	Change proposed. The figure has been amended to change titling the line as 'West London Line' to 'London Overground' and the 'West London Line' titling has been moved lower down on the image to the correct location.
SP1/4	SP1, Para 3.8, bullet 3	The wording of the Local Plan should reflect the	1	Transport for London	Change proposed. Wording has been inserted to recognise that feasibility work into the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		uncertainties of the delivery of an Elizabeth Line station at Kensal Canalside and that feasibility work is underway			delivery of Kensal Canalside station is underway.
SP1/5	SP1, Figure 3.3	The new Overground stations at Hythe Road and Old Oak Common Lane should be removed from this image which shows existing context	1	Transport for London	Change proposed. This map is an existing context map so it is inappropriate for it to show the proposed overground stations and these have therefore been removed.
SP1/6	SP1	The potential for early interim catalysts for growth should be acknowledged in the Policy and the supporting text	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. The potential for catalyst uses is referenced in Policy SP6 (Connecting People and Places). It is considered that it would result in unwarranted repetition to also include it here.
SP1/7	SP1, Para 3.5	There is a typo. 'benifits' should read 'benefits'	1	Royal Borough of Kensington and Chelsea	Change proposed. The typo has been corrected.
SP1/8	SP1	Para 3.8 refers to the need to ensure any impacts on surrounding town centres are mitigated, but this should be amended to require no detrimental impacts. This requirement should also be reflected in Policy SP6.	1	Royal Borough of Kensington and Chelsea	Change proposed. The wording has been revised to reflect the wording in the NPPF requiring proposals to not result in significant adverse impacts (para 27). This wording has also been carried across into the lead in to policy TCC1.
SP1/9	SP1	Policy should reflect that the rail interchange is being built in an area of deprivation which poses challenges for balancing the needs of	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. Recognition that the development is being built within a deprived part of London is set out in the supporting text to SP1 and it is felt that this text, along with other text in the policy and supporting text, recognise the need to balance the needs of

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		existing residents with that of new arrivals		Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	existing communities with those of new arrivals.
SP1/10	SP1	New development is likely to result in rising rent levels in Harlesden, impacting further on the deprivation of the area.	1	Harlesden Lets	No change proposed. A lack of new housing being built is likely to have a similar or worse effect on house prices in Harlesden. There is a need to build new housing in London to meet needs.
SP1/11	SP1	Policy asserts that regeneration will bring benefits to surrounding areas but other policies in the Local Plan do not guarantee this will be the case.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the Local Plan's policies will bring benefits to surrounding communities - this will include new transport infrastructure, homes, jobs and ancillary uses. The Integrated Impact Assessment has assessed the impact of the Local Plan's policies and this shows that the policies will deliver significant benefits to surrounding areas
SP1/12	SP1	Should re-order the policy so that the larger points (new part of London) are reviewed higher than the more detailed points (deliver a new transport super-hub).	1	West London Line Group	No change proposed. OPDC does not consider that the ordering of the policy is a matter that affects the soundness of the policy and therefore does not propose to amend its ordering.
SP1/13	SP1, para 3.2	Paragraph should reference that it is important that the station also include strong	1	West London Line Group	No change proposed. The need for the station to be adequately embedded in the public realm, to allow for the movement of

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		links to other public transport, particularly local rail services.			passengers to other transport modes is covered in Policy P1C1.
SP1/14	SP1, para 3.8	Should make reference to the proposed Westway Circus London Overground station	1	West London Line Group	No change proposed. This is not a committed scheme, is not supported by TfL and is not within the OPDC area so there is not a need to make reference to this proposal.

Strategic Policy SP2: Good Growth

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP2/1	SP2	There is no mention of how you plan to reduce pollution levels	1	Robert Covell	No change proposed. The Local Plan sets out a series of measures aimed at reducing pollution levels. This includes, inter alia, prioritising more sustainable modes of transport, in accordance with Policy SP7, requiring development to protect existing and provide new green infrastructure in accordance with SP8, requiring development to deliver an overall improvement in air quality in accordance with Policy EU4, requiring development to meet or exceed on-site carbon emissions targets set out in the London Plan in accordance with Policy EU9 and supporting the Circular and Sharing Economy, in accordance with Policy EU7
SP2/2	SP2	Support Policy SP2	5	Mayor of London, T.A.S.B. Investments Ltd, Association for	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Consultancy and Engineering (ACE), A40 Data Centre B.V, Hammersmith and Fulham Council	
SP2/3	SP2	The good growth policy should reference the transport principles of good growth which are set out in the Mayor's draft Transport Strategy.	1	Transport for London	No change proposed. The good growth policy in OPDC's Local Plan is specific to OPDC whereas the Mayor's Transport Strategy principles are specific to the Mayor's Transport Strategy. It is therefore not considered appropriate to reference these in OPDC's Good Growth policy in the Local Plan.
SP2/4	SP2	Should avoid reference in para 3.11 to hard to define concepts such as community cohesion and empowerment, safety and security and respect of diversity	1	Old Oak Park Ltd	No change proposed. This text is quoting the principles of lifetime neighbourhoods as defined in DCLG's 'Lifetime Neighbourhoods' document.
SP2/5	SP2, Para 3.13	Para 3.13 should recognise that not all sites in Park Royal will be suitable for SIL uses above two storeys	1	A40 Data Centre B.V	No change proposed. The Park Royal Intensification Study identifies different approaches to intensification, some of which would could be achieved by in-fill development and would not require increased building heights. Para 3.32 of the Local Plan identifies that opportunities to intensify Park Royal should be taken, where feasible, recognising that now all sites in Park Royal will be suitable for intensification.
SP2/6	SP2	Support SP2b)	1	Environment Agency	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP2/7	SP2	Should consider if there is a suitable monitoring indicator for good growth	1	Hammersmith and Fulham Council	Change proposed. The KPIs have been updated to include monitoring indicators for all strategic policies.
SP2/8	SP2	Support SP2d)	1	ArtWest	Noted.
SP2/9	SP2	SP2 is not sound because it is not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development	1	St Quintin and Woodlands Neighbourhood Forum	No change proposed. OPDC does not consider that Policy SP2 is unsound. It is not made clear how specifically Policy SP2 is not meeting objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so. SP2 does not directly deal with objectively assessed needs, which predominantly relates to housing targets. Housing targets are dealt with in Policy SP4.
SP2/10	SP2	Do not consider SP2 to be the most appropriate strategy and that an alternative strategy would be more successful and more sustainable	14	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers Policy SP2 to be the most appropriate strategy to support the sustainable regeneration of the area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP2/11	SP2	The plan needs to recognise the need for flexibility to respond and adapt to change	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The need for flexibility in design is recognised in Policy SP2. Where appropriate, particularly where evidence is more detailed and proposals are likely to come forward sooner, the Local Plan provides greater detail, but where development is not likely to come forward for a significant amount of time and where there are a number of potential design approaches to support the sustainable regeneration of the area, the Local Plan has been drafted with the need for greater flexibility in mind.
SP2/12	SP2	There is a mismatch between quantity and quality, between the ambitions for good growth and the densities being proposed	14	Hammersmith Society, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the densities proposed are consistent with the principles of good growth. the Local Plan shows that the future public transport access will create a highly accessible part of London. OPDC considers it appropriate and both consistent with the NPPF and in general conformity with the London Plan to promote high density development in this location. A series of policies in the Local Plan aim to ensure that where high density development is proposed, in delivers development of a high quality, which appropriately addresses issues such as, inter alia, context and townscape (SP9), access and inclusivity (D2), amenity (D6), open space provision (EU1), air quality (EU4) and noise and vibration (EU5).

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP2/13	SP2	Technology might improve efficiency, but will not produce better quality	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC does not propose to amend its approach to designing, constructing and managing a smart and resilient city as outlined in SP2.
SP2/14	SP2, 3.10	Need to set out the evidence lies behind the simplistic assertion that 'through high density, transit oriented development the greatest sustainability benefits can be realised'. While the present London Plan reflects a policy of building at higher densities near public transport nodes, the concept that Londoners either wish or need to live in extreme 'super-densities' in tall buildings around railway stations has not gone unchallenged in recent years.	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. It is a well understood planning principle that high density development should be delivered in the areas of high public transport access. This helps to reduce journeys by less sustainable transport modes and reduces the need for urban sprawl. There is a need to ensure appropriate quality to this form of development, which the Local Plan policies have sought to achieve. However, the text has been amended to 'some of' to note that there may be some strands of sustainability may not realise the greatest benefits through transit orientated development.
SP2/15	SP2	Support SP2g)	1	Harlesden Lets	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP2/16	SP2	Should promote off-site modular construction.	1	Harlesden Lets	Noted. Off-site modular construction is supported within policy SP2 (advanced construction).
SP2/17	SP2	Good growth is a nebulous concept and its attributes lack precision and measurability.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The good growth policy is a high level strategic policy. Its measurable attributes are embedded throughout the more detailed other strategic and development management policies in the Local Plan. The Local Plan is also supported by Key Performance Indicators relating to Good Growth.
SP2/18	SP2	Policy should give greater steer on how to create exemplary developments	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan provides detailed policies on how development will be anticipated to deliver exemplary developments.

Strategic Policy SP3: Improving Health and Reducing Health Inequalities

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP3/1	SP3	Policies need to reflect that there is a high level of deprivation and obesity in the area	1	NHS Brent CCG,	No change proposed. The high levels of deprivation and obesity in the local area are referenced in Figure A1.9 in the appendix. Policy SP3 recognises the need for the development of the area to assist in improving health and tackling health inequalities. The requirements of SP3 are delivered through a series of policies in the Local Plan that address open space and play space provision, indoor daylight and sunlight standards, outdoor impacts such as wind, noise and air quality and policies aimed at reducing pollution, such as SP7 (connecting people and places) and EU9 (minimising carbon emissions and overheating). The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study, incorporating SA/SEA requirements.
SP3/2	SP3	Support approach to and recognition of importance of health and well-being	1	Sport England	Noted.
SP3/3	SP3	The healthy streets approach should be recognised as a core element to this policy and reference to T1 should be made in the supporting text.	1	Transport for London	Change proposed. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. However, reference has been made to how healthy streets can contribute to a healthy outdoor environment in the supporting text. The policy links box includes the transport chapter, in recognition

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					that the requirements set out in the transport chapter have a relation to improving health and reducing health inequalities. This is not limited to the Healthy Streets Approach and also relates to issues such as controlling car parking and promoting electric vehicle charging and promoting the movement of freight and construction materials by rail and the canal. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
SP3/4	SP3	Support Policy SP3	16	Sport England, Hammersmith and Fulham Council, West Twyford Primary School, Hammersmith Society	Noted.
SP3/5	SP3	Policy SP3 should acknowledge the role that sport and leisure activities can play in supporting health and well-being.	1	Sport England	No change proposed. There are a number of determinants of good or poor health and well-being and all cannot all be referenced in this policy or in supporting text. The policy links box includes the environment and utilities and town centre and community uses chapters, in recognition that the requirements set out in these chapters, which includes access to sports and leisure activities, has a relation to improving health and reducing health inequalities. The health impacts of the Local Plan's policies have also been assessed as an

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					integral part of the Integrated Impact Assessment supporting study.
SP3/6	SP3	Whilst OPDC was not successful in its bid to be a Healthy New Town, a set of principles could be developed and included in Policy SP3 that set out how the OPDC area will deliver innovation and best practice in health and well-being outcomes	1	Healthy Urban Development Unit	No change proposed. There are a multitude of determinants of health and there are a range of policies throughout the Local Plan aimed at improving health and reducing health inequalities. OPDC considers that all these would support the area being developed as a Healthy New Town, in spirit if not in designation. It is not considered appropriate to repeat these policy requirements under Policy SP3.
SP3/7	SP3	the policy could make reference to the need to address adverse environmental impacts and link to policy EU4, EU5 and EU13	1	Healthy Urban Development Unit	Change proposed. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. However, reference has been made to how environmental impacts should be addressed in the outdoor environment. The policy links box includes the environment and utilities chapter, in recognition that the requirements set out in this chapter have a relation to improving health and reducing health inequalities. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
SP3/8	SP3	Need to recognise the need for coordinating construction activities and mitigation	1	Healthy Urban Development Unit	No change proposed. The requirements for coordinating construction activities and ensuring appropriate mitigation measures are

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		measures to minimise the impact on existing and future communities			covered elsewhere in the Local Plan in policies SP10 and T8.
SP3/9	SP3	Support requirement for Health Impact Assessments	1	Healthy Urban Development Unit	Noted.
SP3/10	SP3	The supporting text could also refer to the role that EIAs play in addressing human health issues	1	Healthy Urban Development Unit	No change proposed. The need to produce Environmental Impact Assessments (EIAs) is governed by separate legislation. It is not felt necessary to identify that such assessments consider human health impacts. Such assessments also assess development impacts on other aspects and it is considered that if reference is made in SP3 to human health being a consideration within EIAs, other elements of the document would need to make reference to the other aspects dealt with in an EIA, adding unwarranted factual detail to the Local Plan.
SP3/11	SP3	North Pole Road is dominated by cheap confectionary, discounted alcohol and multipacks. Someone needs to take control of the High Street and improve local residents' health	1	Ark Burlington Danes Academy	Noted. North Pole Road is outside of the OPDC area but OPDC is looking to control uses that impact on health within the OPDC such as hot-food takeaways, betting shops, amusement arcades and pay-day loan shops. This is dealt with in Policy TCC2. Issues such as the availability of confectionary and discounted alcohol fall outside of the remit of planning.
SP3/12	SP3	Projections for improving health are excessively	1	Friary Park Preservation Group	No change proposed. OPDC considers that the application of the policy within SP3 and the application of other policies within the plan will

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		positive and are therefore unsound			help to ensure that develop does help to improve health and reduce health inequalities.
SP3/13	SP3	The establishment of a Low Emissions Neighbourhood discussed in para 6.47 should be incorporated as a policy requirement in SP3.	6	Wells House Road Residents Association, Joanna Betts, Francis, Mark and Caroline Sauzier, Lily Gray, Catherine Sookha, Thomas Dyton	No change proposed. OPDC are in discussions about the potential designation of a Low Emissions Neighbourhood (LEN) within the OPDC area. Any designation would need to undergo a separate decision process, within OPDC and TfL and therefore cannot be made a policy requirement through this Local Plan. In addition, air quality matters are one of many determinants of health. Policy SP3 is a high level strategic policy addressing determinants of health in a rounded manner. It is not felt appropriate to address specific air quality matters here, and that instead, these matters should be appropriately addressed in the air quality policy.
SP3/14	SP3	Policy SP3 references that most people spend their times indoors, but consideration should also be given to air quality issues outdoors in specific areas used by vulnerable groups such as children (play space) and the elderly (open space in general)	6	Wells House Road Residents Association, Joanna Betts, Francis, Mark and Caroline Sauzier, Lily Gray, Catherine Sookha, Thomas Dyton	No change proposed. Consideration has been given to the outdoor environment - this is set out in the preceding paragraph to the paragraph dealing with the indoor environment. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. The policy links box includes the environment and utilities and design chapter, in recognition that the requirements set out in this chapter have a relation to improving health and reducing health inequalities. This includes policy EU4 on air quality, policy EU1 on open

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					space and policy D9 on play space. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
SP3/154	SP3	Policy as it stands is unjustified as is does not set out how positive health outcomes will be achieved through other strategic and more detailed policies.	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the Local Plan policies will support the reduction of health inequalities and the delivery of improved health. There are a number of facets to this, dealt with across a number of policies throughout the plan. In broad terms, it includes, inter alia, delivering new housing to meet a range of needs, delivering new jobs across a range of sectors and skills levels, delivering new transport infrastructure that prioritises sustainable transport modes and delivering a high quality place, with consideration given to amenity, air quality and ensuring adequate access to open space and town centre and community facilities to meet needs.
SP3/16	SP3	The design, size and practicality of living accommodation should also be considered as an important factor impacting on health and well-being.	1	Harlesden Lets	No change proposed. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. The policy links box includes the housing chapter, in recognition that the requirements set out in this chapter have a relation to improving health and reducing health inequalities. This includes policy H3 on housing mix, which requires self-contained housing to meet London Plan and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					national housing space standards and that requires 90% of homes to meet Building Regulation M4(2) and 10% to meet M4(3). The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
SP3/17	SP3	Well-being can reduce the costs in health-care, crime and public resources	1	Harlesden Lets	Noted.
SP3/18	SP3	The proposals for high densities and tall buildings contradicts the desire for a healthy environment	1	Harlesden Lets	No change proposed. OPDC disagrees that support for tall buildings necessarily negatively impacts on the creation of a healthy environment. The policies in the Local Plan require that development ensures high standards of design of tall buildings. Relevant policies include SP9, D4, D5, D6 and D8, amongst many others.
SP3/19	SP3	The policy is silent on a number of key issues that have significant impact on health and health inequalities including air quality (with the exception of indoor air quality mentioned in 3.22), overcrowded homes and gypsy and travellers' accommodation. Further detail should be added and the policy should require	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. There are a number of determinants of good or poor health and well-being and all cannot be referenced in this policy or in supporting text. Air quality is referenced in relation to indoor air quality as noted but text has now been inserted referencing air quality in relation to the outdoor environment. The policy links box includes the housing chapter that includes policies on gypsies and travellers and which includes policies for the delivery of new homes to address the chronic demand for new housing

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		proposals to support reducing these specific existing health inequalities.			in London. The health impacts of the Local Plan's policies have also been assessed as an integral part of the Integrated Impact Assessment supporting study.
SP3/20	SP3	The Local Plan should recognise overcrowding as having a negative impact on health and well-being and set out how this is being addressed	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. There are a number of determinants of good or poor health and well-being and all cannot all be referenced in this policy or in supporting text. The Local Plan includes policies aimed at tackling overcrowding, particularly by seeking to increase housing supply and provide a range of housing types and tenures (Policy SP4).
SP3/21	SP3	Healthy streets will encourage active lifestyles	1	Association for Consultancy and Engineering (ACE)	Change proposed. Wording has been inserted to recognise the benefits of healthy streets to health and well-being.

Strategic Policy SP4: Thriving Communities

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP4/1	SP4	Do not consider Policy SP4 on Thriving Communities to be 'positively prepared' in respect of the housing element of these policies and based on a strategy which seeks to meet	14	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Forum, Wells House Road Residents Association,	No change proposed. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red-line boundary as would usually

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development		Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF and existing guidance on assessing housing need in strategic housing market assessments. Based on a current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). However, as Opportunity Areas identified in the London Plan with the capacity to provide at least 25,500 homes, Old Oak and Park Royal can also help to meet city-wide housing need. The Development Capacity Study is part of the evidence base of this Local Plan identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively assessed housing needs within OPDC's red-line boundary will be met in full. However, the development will also help to meet wider housing needs in the wider housing market area of London Boroughs of Brent, Ealing and Hammersmith & Fulham and also help meet strategic London-wide housing need. OPDC considers it is a sound approach to meet local

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					objectively assessed needs and fulfil a role in meeting the needs of the host local authorities and the wider London area. The targets in OPDC's Local Plan are considered to be in general conformity with the Mayor's London Plan targets for the area.
SP4/2	SP4	Support aims of policy, but encourage OPDC to work with partners to enable early delivery.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Noted.
SP4/3	SP4	Overall supports delivery of much needed housing and associated social infrastructure but suggests that more housing could be delivered. More information could be provided in the Local Plan on how OPDC will influence/encourage delivery.	1	Association for Consultancy and Engineering (ACE)	No change proposed. As outlined in SP10, OPDC's Development Capacity Study has assessed the capacity for new homes in the area. This is reflected in OPDC's housing targets. Timing and phasing is critical to the delivery of OPDC's housing targets. OPDC's Absorption Rate Study has assessed typical delivery rates across large regeneration schemes in London over recent years, and has concluded, given the scale of the site, that there are multiple delivery markets within Old Oak and Park Royal that means that the housing targets may be delivered. In addition, OPDC has carried out a Social Infrastructure Study to identify the social infrastructure requirements for the area. The Delivery and Implementation Chapter 11 details how as a proactive planning authority, OPDC will support the timely delivery of new homes and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					optimised phasing to meet, and where possible, exceed the housing targets.
SP4/4	SP4	Projections for thriving communities seem excessively positive and therefore unsound.	1	Friary Park Preservation Group	No change proposed. This strategic policy aims to promote lifetime neighbourhoods, social cohesion and the integration of new and existing communities through the delivery of new homes to meet housing needs along with new social infrastructure.
SP4/5	SP4	There is no justification for an 'objectively-assessed need' for 24,000 new homes at Old Oak.	14	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red-line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF. Based on this approach, and the OPDC area's current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). The Development Capacity Study identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					assessed housing needs within OPDC's red-line boundary will be met in full. However, the development will also help to meet wider housing needs in the wider housing market area of London Boroughs of Brent, Ealing and Hammersmith & Fulham and as Opportunity Areas help meet strategic London-wide housing need.
SP4/6	SP4	OPDC has not considered an alternative vision with a lower housing target for Old Oak which would be significantly more successful and sustainable.	14	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The legal requirement is to test 'reasonable' alternatives that are sufficiently distinct to enable their meaningful comparison. The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal are specifically referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					The FALP, together with the OAPF set a strategic development capacity target for the OPDC area and it would therefore not have been appropriate to test lower development capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan. OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable. It should be noted that LBHF's Issues and Options consultation was undertaken in advance of the consultation on and publication of the Mayor's Old Oak and Park Royal Opportunity Area Planning Framework and in advance of the publication of the London Plan (2015).
SP4/7	SP4, para 3.97	The housing targets are based on the land that is available for development. This involves rafting over areas that may be too difficult and expensive.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's Development Capacity Study has assessed the capacity for new homes in the area. The challenges of delivering this, including relocating, reconfiguring and decking over a number of large-scale operations are referenced in the supporting text for Policy SP10.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP4/8	SP4	The housing targets should be reduced to be consistent with the 'central' classification in the London Plan or the plan should be found unsound.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. In light of the future excellent national, regional and local public transport links to be provided in the area, Old Oak is considered suitable for high density development and Park Royal is considered suitable for protected and intensified industrial uses. This approach is supported by policies set out in the London Plan and reflected in the designation of two Opportunity Areas with a combined target for a minimum of 25,500 new homes and 65,000 new jobs. Opportunity Areas are London's main reservoirs for growth. As such, the current London Plan 2016 (Policy 2.13) supports development in these areas to exceed the defined targets by optimising development densities. The Mayor of London's Housing SPG (2016) states that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2). Policy SP9 in this Local Plan requires development to respond to local character and context but 'reflecting' local context would be inappropriate, especially given the area's identification as opportunity areas and potential as set out in the London Plan, for the area to deliver high densities and tall buildings. The draft London Plan 2017

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					removes the density matrix and instead requires a design- led approach that optimises densities.
SP4/9	SP4	Policy SP4 promotes lifetime neighbourhoods, social cohesion and the integration of new and existing communities. Policy SP4ii is of no direct relevance to the achievement of this objective and should be deleted as a sub-clause.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The regeneration of Old Oak and Park Royal can play an important role in meeting both local objectively assessed need and London-wide housing need. In creating a new part of London, a whole range of new homes will be delivered to meet a diverse housing need, including private sale, affordable, built-to-rent and specialist homes, all provided as part of a mixed and balanced community with lifetime neighbourhoods as envisaged in the Thriving Communities Policy.
SP4/10	SP4	Encouraged by the proposed range of housing types.	1	Harlesden Lets	Noted.
SP4/11	SP4	As part of the strategic policy for housing there should be a mix of housing types but with the overwhelming priority on social rented housing at rents that people on low incomes can afford.	1	Harlesden Lets	No change proposed. SP4a)i) explains that proposals should provide a range of housing tenures, types and sizes that deliver mixed and inclusive communities and help meet local and London-wide need. Chapter 8, and particularly Policy H2, detail the requirements for different types of affordable housing, including London Affordable Rent (based on target rents, formerly known as social rent). The tenure requirements are in accordance with the Mayor of London's Affordable Housing and Viability SPG (2017) and the draft London Plan 2017.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP4/12	SP4	Diversity in design should be recognised so that apartments, houses, town houses, mansion blocks as well as dwellings for elderly residents and easily-adaptable homes for disabled people are all part of the mix.	1	Harlesden Lets	No change proposed. SP4a)i) explains that proposals should provide a range of housing types and sizes that deliver mixed and inclusive communities. Policy H3 states that housing should be flexibly designed and adaptable. Policy H9 supports the delivery of specialist housing to meet the needs of older people and other people with specialist housing needs, such as people with physical disabilities.
SP4/13	SP4	SP4(a)i should be amended to: 'homes that provide a proportionate level of all types of homes to meet objectively assessed need (as required by the NPPF) which will positively contribute to meeting London-wide need'.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed to policy. However, some additional text has been added to the supporting text which clarifies that the overall capacity of the development will enable OPDC to meet its objectively assessed need as well as contribute towards meeting London-wide housing need.
SP4/14	SP4	The OPDC's evidence base does not provide evidence to support delivery of a 50% affordable housing target.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. In accordance with the NPPF, the Local Plan needs to meet the full, objectively assessed needs for market and affordable housing in the local housing market area. As set out in the Housing Evidence Statement, according to OPDC's Strategic Housing Market Assessment (SHMA), there is a

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	45% affordable housing need in the area. As Opportunity Areas, Old Oak and Park Royal can also help to meet city-wide housing need. The latest 2017 GLA SHMA published along with the Draft London Plan identifies that London's affordable housing need has increased to 65 per cent because needs have not been met. Therefore a 50 per cent affordable housing target for OPDC is considered to be appropriate for the following reasons: The Draft London Plan 2017 specifies an overarching 50% affordable housing target; including 50 per cent affordable housing for public sector land, Strategic Industrial Locations, and Locally-Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses. The Mayor's draft Housing Strategy also sets a target for Mayoral organisations for an average of 50 per cent of homes on land brought forward under the current administration to be affordable. An Affordable Housing Viability Assessment (2017) has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure split: 70% London Affordable Rent/30% Intermediate; 43% London Affordable Rent/57% Intermediate; 30% London Affordable Rent/70% Intermediate. This concluded that: 70% of the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing; 30% London Affordable Rent/70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. Accordingly, it is considered that this provides evidence to support a 50% affordable housing target for OPDC.
SP4/15	SP4	The proposed tenure split will not meet the objectively assessed housing need.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The strategic policy refers to OPDC's overarching 50% affordable housing target. However, some supporting text has been added to clarify that the quantum of housing enables OPDC to meet its objectively assessed need. Details on housing tenure are contained in Policy H2.
SP4/16	SP4	Add after 'population', 'of all ages, abilities/disabilities and income' (to ensure delivery of mixed and inclusive communities).	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. Policy SP9a)vi) sets out how the built environment will be required to demonstrate a high standard of accessible and inclusive design. Policy D3 sets out more details of requirements for accessible and inclusive development that is compliant with the latest guidance and deliver design

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	solutions that meet the requirements of all users.
SP4/17	SP4	Add (c) securing delivery of active community involvement and ownership.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy DI3d) supports community ownership and management programmes. It is not considered necessary to repeat this in this strategic policy.
SP4/18	SP4	Add (d) delivering tangible and measurable benefit to existing deprived and excluded community members in surrounding neighbourhoods.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The main focus of this policy is homes and infrastructure and integration of new and existing communities. The spatial vision and strategic policies as a whole describe how the regeneration of Old Oak and Park Royal can benefit existing deprived communities in surrounding neighbourhoods. Figure 2.1 in the Spatial Vision provides a summary of the opportunities to create a socially, environmentally and economically sustainable community in Old Oak and Park Royal.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP4/19	SP4	Support for the aspiration to deliver the amount of homes to meet a range of needs and in fact more homes could be delivered to meet the housing need, subject to infrastructure and viability considerations	1	Association for Consultancy and Engineering (ACE)	Noted. The housing targets are minimum targets.

Strategic Policy SP5: Economic Resilience

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP5/1	SP5	Not clear how jobs figures have been calculated and need to do further work to understand what jobs are likely to be attracted to what sectors and how this will benefit local employment	1	Michael Hangyal	No change proposed. The Local Plan is supported by a Development Capacity Study which sets out how the jobs figures have been calculated. The Future Employment Growth Sectors Study also accompanied the Plan and this identified the sectors likely to grow in the Old Oak and Park Royal area. It would not be appropriate for the Plan to identify how many jobs will be delivered in each economic sector as this would be inflexible to changing economic cycles and trends. Policy E5 requires relevant developments to help local people benefit from employment opportunities.
SP5/2	SP5	The Plan should identify where the intensification of industrial land should occur and should be less about	2	Ealing Council, Segro	Change proposed. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		protection and more about a proactive strategy for delivery of growth. This should also consider decant arrangements.			identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as new industrial site allocations. OPDC acknowledge that other sites identified in the Study or windfall sites could also contribute towards intensification and policy E1 would support this.
SP5/3	SP5	The plan should have a fall back position in case of slower economic growth, with lower jobs targets	1	Hammersmith Society	No change proposed. The Local Plan covers 20 years over which there will be economic peaks and troughs. It is not considered appropriate to assume a significant economic downturn from the outset of the Local Plan. The Local Plan is accompanied by a set of Key Performance Indicators (KPIs). If Plan targets are not being achieved, this would be identified through these KPIs and this may trigger a review of the Plan's policies to either ensure the jobs targets are met or to revise them down accordingly.
SP5/4	SP5	In the right location and with the right design and planning controls, SIL uses can be located next to non SIL Uses	1	A40 Data Centre B.V	No change proposed. The Mayor's London Plan sets out the strategic approach to promoting and managing industrial land, including defining which uses are appropriate within Strategic Industrial Locations (SIL). In line with the Industrial Land Review, OPDC's key priorities for SIL are to protect, strengthen and intensify industrial activities. To ensure these objectives are met, development will only be permitted if it does not materially affect the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					ongoing functioning of employment uses in line with policy D6.
SP5/5	SP5	Object to London Living Wage being referenced in the policy. It is not the role of the planning system to control workers' pay and conditions	1	DP9 (on behalf of Old Oak Park Limited)	No change proposed. The policy 'strongly encourages' contractors and building occupiers to sign up to the London Living Wage. The London Living Wage is recognised as a key method of addressing in-work poverty and is therefore a key facet of ensuring economic resilience. Wording has been inserted to reference that this requirement would be secured through an informative on planning decisions.
SP5/6	SP5	Latest version of the Local Plan (Fig 3.4) correctly indicates a site which is in residential use, which was erronous in the Reg 18 Local Plan	1	Boyer Planning (on behalf of Raban Goodhall Ltd)	Noted.
SP5/7	SP5	Site currently designated as SIL should be identified for development	1	Boyer Planning (on behalf of Raban Goodhall Ltd)	Change proposed. The Industrial Land Review and Addendum have undertaken a review of additional sites within SIL to assess to determine whether additional changes to the SIL boundary are appropriate. The Goodhall Street sites are proposed to be released from SIL for mixed use development.
SP5/8	SP5	More flexibility is required in the SIL area to allow for mixed use development in SIL around residential areas (i.e. railway cottages and		Nicky Guymer; Bruce Stevenson; Oonagh Heron; Mark Walker; Dave Turner; TITRA; Midland Terrace Residents; Nye Jones; DP9	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the ongoing

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Midland Terrace) on Old Oak side of the development zone.		(on behalf of A40 Data Centre BV); Joanna Betts; Nadia Samara; Nicholas Kasic; Francis, Marc and Caroline Sauzier; Patrick Munroe; Lily Gray; Ralph Scully; Catherine Sookha; Lynette Hollender; Jeremy Aspinall; Thomas Dyton	demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. Detailed changes to the SIL boundary have been assessed in the Industrial Land Review Addendum.
SP5/9	SP5	Policies are over restrictive in terms of their protection of SIL, more flexibility is required across SIL (Park Royal West and Old Park Royal)	15	Old Oak Neighbourhood Interim Forum; TITRA, Midland Terrace Residents; Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the ongoing demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. The London Plan provides strategic protection to SIL and defines which uses are appropriate in these areas. A more flexible approach in designated SIL would not be in general conformity with these policies.
SP5/10	SP5	Support protection, intensification and strengthening of Park Royal SIL.	1	CBRE (on behalf of SEGRO); GLA	Noted.
SP5/11	SP5	Support the creation of new jobs, including fairer economy, optimising employment opportunities for	16	LBHF; Hammersmith Society; Harlesden Lets, Wells House Road Residents Association,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		local residents and working with training and educational institutions.		Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP5/12	SP5	Support for creative sector and the provision of new workspaces, including creative low cost workspaces.		ArtWest; ACAVA; Joanna Betts; Nadia Samara; Nicholas Kasic; Francis, Marc annd Caroline Sauzier; Patrick Munroe; Lily Gray; Hammersmith Society; Wells House Road Residents Association; Ralph Scully; Catherine Sookha; Lynette Hollender; Grand Union Alliance; Jeremy Aspinall; Thomas Dyton;	Noted.
SP5/13	SP5	Policy should reference all of the relevant evidence base. Failure to reference relevant evidence base calls into question the transparency of the consultation process.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	Change proposed. Additional supporting text has been added to policy E1, drawing on information from the Industrial Land Review, referring to the area of existing industrial land affected.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP5/14	SP5	The delivery of small workspaces and flexible workspaces will be hampered by plans to protect, strengthen and intensify the Strategic Industrial Location (SIL) in Park Royal.	16	Old Oak Neighbourhood Interim Forum; TITRA; Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. It is considered that protecting, intensifying and strengthening Park Royal will not compromise the implementation of policy E3. Protecting and intensifying SIL will ensure that industrial floorspace is available to help meet demand. This floorspace can be used to accommodate small businesses and a range of broad industrial type activities.
SP5/15	SP5	Support encouragement of London Living Wage, but also need to think about need to provide housing for those on the London Living Wage	1	Harlesden Lets	Noted. Delivering affordable housing in a range of tenures, types and sizes is a key objective of the Local Plan as set out in Policies SP4 and H2.
SP5/16	SP5	More detail is needed on how Industrial intensification will be delivered.		London Borough of Ealing	Change proposed. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as new industrial site allocations. OPDC acknowledge that other sites identified in the Study or

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					windfall sites could also contribute towards intensification and policy E1 would support this.
SP5/17	SP5	Question whether industrial intensification is achievable.		DP9 (on behalf of A40 Data Centre BV); Joanna Betts; Nadia Samara; Nicholas Kasic; Francis, Marc and Caroline Sauzier; Patrick Munroe; Lily Gray; Hammersmith Society; Wells House Road Residents Association; Ralph Scully; Catherine Sookha; Lynette Hollender; Jeremy Aspinall; Thomas Dyton; Grand Union Alliance; Old Oak Interim Forum	Change proposed. The Park Royal Intensification Study explores opportunities as well as deliverable and commercially viable strategies to intensify industrial land. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as new industrial site allocations. OPDC acknowledge that other sites identified in the Study or windfall sites could also contribute towards intensification and policy E1 would support this.
SP5/18	SP5	Not convinced that that sites identified in the intensification study are sufficient to meet demand for industrial space.		Park Royal Business Group	Change proposed. The new draft London Plan (2017) requires no net loss of industrial floorspace capacity within designated SIL. The Industrial Land Review Addendum demonstrates how this objective will be achieved through OPDC's Local Plan. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification and co-location of industrial floorspace.
SP5/19	SP5	Industrial land is important to London's economy and productivity, but it is facing		CBRE (on behalf of SEGRO)	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		structural changes and challenges. Urban logistics is a key element of London's industrial sector and is critical to its productivity and economic success.			
SP5/20	SP5	Support intensification but challenges linked to intensification need to be addressed and it needs be grounded in the needs of the market and subject to viability.		Park Royal Business Group; CBRE (on behalf of SEGRO)	Change proposed. The Park Royal Place policies have been amended to clarify how the Plan will facilitate the delivery of intensification. OPDC's Intensification Study identifies sites likely to be suitable and viable for intensification. Where sites meet the threshold, they have been identified as site allocations. The Place Policies and Transport policies also seek to address some of the key challenges linked to intensification including improvements to the movement network.
SP5/21	SP5	The Plan should be clearer in setting out how SIL intensification will be delivered, including identifying site allocations for industrial intensification.	1	Mayor of London	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the area's London-wide role and the ongoing demand for industrial space. A mix of uses within SIL would undermine its core function as a reservoir or land for industrial uses. Transport policies seek to limit car parking and would require travel plans and transport assessments.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP5/22	SP5	Recognise that more efficient use of land through intensification is required and broadly support recommendations for this.	1	Park Royal Business Group	Noted.
SP5/23	SP5	A bold shift in policy and approach is needed to actively promote and facilitate new industrial development under a clearly defined spatial vision.	1	CBRE	Noted. OPDC considers that the policies in the Local Plan seeks to achieve this.
SP5/24	SP5	Site currently designated as SIL should be identified for development	1	Boyer Planning (on behalf of Raban Goodhall Ltd)	Change proposed. The Industrial Land Review and Addendum have undertaken a review of additional sites within SIL to assess to determine whether additional changes to the SIL boundary are appropriate. The Goodhall Street sites are proposed to be released from SIL for mixed use development.
SP5/25	SP5	Question the deliverability/accuracy of jobs targets as the figures do not take into account the closure and relocation of businesses/jobs.	14	Hammersmith Society; Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The jobs capacity figure is based on a robust assessment of the development potential of suitable sites and broad locations over the plan period. Detailed information on the assessment is set out in the Development Capacity Study and the Park Royal Intensification Study. However, the text has been amended to clarify that the targets refer to new jobs.

Strategic Policy SP6: Places and Destinations

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP6/1	SP6	Support SP6 and recognition of the role catalyst uses can play	1	Imperial College	Noted.
SP6/2	SP6	Support Policy SP6	4	T.A.S.B. Investments Ltd, Association for Consultancy and Engineering (ACE), Hammersmith and Fulham Council, Friary Park Preservation Group	Noted.
SP6/3	SP6, Para 3.53	Para 3.53 erroneously refers to 'Atlas Junction stations' rather than 'Atlas Junction centres'	1	Transport for London	Change proposed. The text has been amended to 'centres'.
SP6/4	SP6	The supporting text to SP6 should refer to the role the Oaklands development will play in early delivery and integrating existing and new communities at Atlas Junction.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	No change proposed. It is not felt appropriate in this strategic policy to draw out and identify one particular scheme. Reference is made to the Oaklands scheme supporting the knitting together the area in the supporting text to the Atlas Junction cluster (Policy P8C1).
SP6/5	SP6	Support the delivery of Old Oak High Street as a major town centre	1	Mayor of London	Noted.
SP6/6	SP6	Support the introduction of a separate place for Willesden Junction	1	Old Oak Park Ltd	Noted.
SP6/7	SP6	Para 3.51 refers to setting the trajectory of the centre. The	1	Old Oak Park Ltd	No change proposed. OPDC considers it important to set the trajectory now so that

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		trajectory should not be set now as there will be many influences and considerations that warrant a more flexible approach			individual schemes that come forward can be assessed against the understanding of the likely emergence of the wider centre. The rationale for this is set out in OPDC's Retail and Leisure Needs Study and this approach has been supported by the Mayor of London.
SP6/8	SP6	Should include requirement for 'high quality' in the policy and recognise role of local heritage in place-making.	1	Hammersmith and Fulham Council	Change proposed. Wording has been added to part a)i) of the policy to reference 'high quality' and it is considered that the inclusion of high quality within this policy line also binds the other requirements in the policy to contribute towards the creation of high quality places. Reference to heritage informing the creation of distinctive places is already made in the supporting text to Policy SP6.
SP6/9	SP6	Policy SP6 is not sound (no reason given)	1	Sarah Abrahart	No change proposed. Without a reason being given for why the policy is not sound, OPDC is unable to address this issue.
SP6/10	SP6	Support creation of a cultural quarter.	15	Mayor of London, ArtWest, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP6/11	SP6	Policy should set out that each centre should be appropriate to its function and should establish its own identity	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The policy defines the function of each of the centres and requires proposals to support their delivery. The policy also requires development to support the delivery of a series of distinctive places. OPDC considers that the policy therefore addresses this matter.
SP6/12	SP6	Question the concept of clusters which the text states are characterised as locations which are likely to attract higher footfall and/or have a particular use and as such warrant more detailed policy	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Cluster policies are considered necessary to provide extra policy detail at the points in the area where most activity is likely to occur. Responses to the Regulation 18 Local Plan identified and supported the need within certain locations for a greater degree of policy detail.
SP6/13	SP6	The word 'celebrate' does not mean anything in spatial planning terms.	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. The word celebrate is only ever used in supporting text rather than in policy. The Oxford Dictionary defines that 'celebrate' can be to 'honour or praise publicly' and in the instances it is used in the Local Plan, the word relates to the aspiration for development to create a feature of a particular asset.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP6/14	SP6	SP6a)ii) is not justified	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. No reason has been provided as to why the policy is not justified. More detailed policies are included in the Local Plan relating to meanwhile and catalyst uses (TCC8 and TCC9) which will be used to assess the acceptability of any proposals.
SP6/15	SP6	SP6 should specifically include – delivery of positive physical and community connections between existing places within and adjacent to the OPDC area, specifically avoiding detrimental impact and segregation.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Physical connections are dealt with in SP7 (connecting people and places) and in the relevant place policies and therefore do not need to be included in SP6. Community connections are dealt with in a general sense in SP4 (thriving communities) and therefore do not need to be included in SP6.
SP6/16	SP6	SP6 should provide policy that ensures a cultural quarter and catalyst use achieves positive regeneration within an	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. The strategic policy is strategic in nature. Policy TCC5 requires that facilities for cultural space meet needs. Likewise, Policy TCC8 requires proposals to perform positively against the criteria within Table 10.2,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		existing relatively deprived area. Proposals should be drawn up in collaboration with local community members and be widely consulted.		Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	which includes that it should complement London and West London's needs and growth aspirations and complement the local characteristics and meet the needs of and provide benefits for the local population.
SP6/17	SP6	The policy should also actively support proposals for community empowerment and ownership – across boundaries of the OPDC area and neighbouring areas	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Community ownership is dealt with under Policy DI3. Community empowerment is dealt with under the lifetime neighbourhoods principles, which are extolled through Policy SP2. OPDC cannot set planning policies to address the delivery of development outside of its boundary.
SP6/18	SP6	Old Oak should be promoted as a cultural destination with a facility that will attract people from across the country	1	Jamie Glazebrook	Noted. This is included within SP6.
SP6/19	SP6	Support provision of a mix of culture and leisure uses in the development	1	David Craine	Noted.
SP6/20	SP6	Development needs to complement Harlesden Town Centre, rather than compete and overwhelm it.	1	Harlesden Lets	Noted. The requirement to complement neighbouring centres is set out in Policy SP6. OPDC also requires schemes over a certain scale to measures that will support the continuing vitality and viability of Harlesden

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					District Centre. Details for this strategy are set out in Policy TCC1.
SP6/21	SP6	Support designation of Old Oak High Street as a major town centre	1	Royal Borough of Kensington and Chelsea	Noted.
SP6/22	SP6	The cultural quarter should include an arts centre and studio space for the local community.	1	Chloe Freemantle	Noted. The provision of a cultural quarter would enable the potential provision of an arts centre and studio space.

Strategic Policy SP7: Connecting People and Places

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/1	SP7	Wormwood Scrubs Street should not be open to traffic. Its role should be clarified.	16	Old Oak Interim Neighbourhood Forum, TITRA; Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. The intention is that Wormwood Scrubs Street is for pedestrians, cyclist and access only vehicles to reduce demand along this east-west route.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP7/2	SP7	The proposed Old Oak High Street is not deliverable and would have a negative impact on the Birchwood Nature Reserve and Canal. Park Road should be main north south route in the development area. Early delivery of the High Street will not be possible. The High Street will be series of disconnected streets.	1	The Inland Waterways Association-Middlesex Branch	Change proposed. The alignment of Old Oak High Street, now named Old Oak Street, has been revised, in recognition of the longer-term deliverability of the Elizabeth Line depots but there is a still a longer term aspiration to deliver a connection over the canal in this location. The Birchwood Nature Reserve and Canal will be protected.
SP7/3	SP7	The number of bridge crossings over the canal should be minimised. This number of crossings in a short distance will compromise the proposed linear park.	1	The Inland Waterways Association-Middlesex Branch	Change proposed. Policy SP8 along with policy EU1 and EU2 all promote the requirements for open space and urban greening. OPDC believe that additional bridges will ensure that better connections are made to the linear park, promoting its use for more vunerable road users. One bridge connection has been removed due to work showing the feasibility of a hybrid bridge solution for an eastern connection over the Grand Union Canal.
SP7/4	SP7	Welcome text supporting water borne movement, including freight, on the canal.	1	The Inland Waterways Association-Middlesex Branch	Noted. No change proposed.
SP7/5	SP7	Public transport should be provided with the same level of priority as pedestrians and cyclists in transport hierarchy.	1	TfL	No change proposed. OPDC see clear merit in producing a robust hierachy to influence user behaviour and identify the core principles for healthy streets. This starts with

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					identifying the most vunerable road uses and ensuring that infrastructure and options are available to encourage sustainable travel behaviour across the site.
SP7/6	SP7	Policy T4 on mode shift and parking should be included in SP7 as they are strategic policy matters.	1	TfL	No Change proposed. SP7 already covers the need to minimise jourrneys by private car and to encourage walking, cycling and public transport use which will lead to modal shift. Specific car parking standards are considered a development management issue and not appropriate for inclusion in a strategic policy.
SP7/7	SP7	TfL recommends that Policy b) part iv could be strengthened; beyond minimising the need for use of private vehicles, OPDC should actively discourage their use including through the respective Borough traffic reduction strategies, consistent with the draft MTS.	1	TfL	Change proposed. OPDC has strengthened the policy
SP7/8	SP7	The need to improve safety, accessibility, connectivity and permeability should be included in SP7 as they are key mayoral transport policies.	1	TfL	Change proposed. Text has been amended to add this requirement.
SP7/9	SP7	Reference to Crossrail on map should be amended to Elizabeth Line.	1	TfL	Change Proposed. The map has been amended to say the Elizabeth Line.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/10	SP7	Consistent colours and terminology should be used on all maps.	1	TfL	Change proposed. Figures have been updated and consistent colours and terminology have been used.
SP7/11	SP7	The form and function of Park Road needs to be clarified because currently it is not clear from the policy and work has been undertaken on this which is at odds.	2	TfL and Old Oak Park Ltd	Change proposed. The text for the form and function of Park Road has been amended to reflect recent transport and masterplanning work. This detail will be clarified in SP7 and further provided in P2.
SP7/12	SP7	Policy should mention the role of facilitating and managing efficient servicing and delivery activities.	1	TfL	No change proposed. The policy references the need for efficient servicing of land uses and servicing and delivery activities are outlined in detail in Policy T7.
SP7/13	SP7	Supporting text should acknowledge potential for early delivery of a new bridge link from EMR to an improved Willesden Junction Station.	1	HGH Planning on behalf of Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. This link forms part of Old Oak Street in the local plan. Within P2 the supporting text discusses the aspiration for the early delivery of this link.
SP7/14	SP7	Acknowledge that early delivery can happen due to construction of first part of Park Road at Oaklands South	1	HGH Planning on behalf of Genesis	No change proposed. The timing of Park Road is provided in the IDP and the site allocation information is provided within SP10. This is sufficient information for the Local Plan.
SP7/15	SP7	Figure 3.8 and 4.12 indicate different forms of vehicular links from Scrubs Lane. This needs to be amended in line with the transport and masterplan work that has been undertaken	1	Old Oak Park Limited	Change Proposed. OPDC has amended the figures to ensure they are accurate and consistent.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/16	SP7	Support for connectivity	1	NHS London Healthy Urban Development Unit	Noted. No change proposed.
SP7/17	SP7	Support Scrubs Lane as an important location for early development	1	DP9 on behalf of Fruition properties	Noted. No change proposed.
SP7/18	SP7	The Council welcomes working with the OPDC to improve the connections between the OPDC area and the adjoining Kensal Canalside Opportunity Area. Needs to be in text for SP7.	1	RB Kensington and Chelsea	No change proposed. Reference to connections to Kensal Canalside are made in the supporting text to SP1.
SP7/19	SP7	Support policy. The need to work with a number of stakeholders in order to deliver infrastructure should be reflected in the policy and the policy wording should be ambitious- i.e. 'sufficient' infrastructre isn't ambitious enough.	1	LB Hammersmith and Fulham	No change proposed. The need to work with a number of stakeholders is captured as a policy in DI2.
SP7/20	SP7	Paragraph deals with the need for transport infrastructure to seamlessly integrate into the development.	1	LB Hammersmith and Fulham	Noted. No change proposed.
SP7/21	SP7	LBHF is keen to continue to work with OPDC to understand and mitigate the impact of development upon LBHF residents and the local road network.	1	LB Hammersmith and Fulham	Noted. No change proposed.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/22	SP7	3.76 should also reflect the sensitive nature of the Grand Union Canal as a nature and conservation site that will be a key feature for the future of this development.	1	LB Hammersmith and Fulham	No change proposed- SP8 outlines this as a key point and expands on the subject.
SP7/23	SP7	Policy is sound	1	Friary Park Preservation Group	Noted. No change proposed.
SP7/24	SP7	Support the Sustainable Transport Hierarchy	1	Brent Cyclists	Noted. No change proposed.
SP7/25	SP7	There is a risk that new routes within the development will affect safety on roads outside of the development must be mitagated against. Roads through the development should have no through route for traffic.	1	Brent Cyclists	No change proposed. SP7 and the relevant place policies indicate the need for roads within the development to be designed to not encourage through traffic and the importance of new and existing roads being designed according to the Healthy Streets approach.
SP7/26	SP7	Health Streets principles must be delivered on all new streets.	1	Brent Cyclists	Noted. Policy SP7 and T1 promote this. No change proposed.
SP7/27	SP7	Concern that the High Street will be built to narrowest allowable width within guidelines.	1	Brent Cyclists	Noted. OPDC intend for Old Oak Street to have a generous width to cater for all users and be resilient to future transport changes. No change proposed.
SP7/28	SP7	Development should mitigate turbulence for road users where it occurs.	1	Brent Cyclists	Noted. No change proposed.
SP7/29	SP7	Support aim to prevent through road for private vehicles.	1	Brent Cyclists	Noted. No change proposed.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/30	SP7	Aim for "specific character and function" must not impact on walking and cycling safety.	1	Brent Cyclists	Noted. In line with the sustainable transport hierarchy, walking and cycling will be at the forefront of the design of streets. No change proposed.
SP7/31	SP7	Canal freight transport must not impact pedestrian and cycle movements along canal.	1	Brent Cyclists	Noted. If moorings on the canal are introduced, they will be designed to ensure they do not impede walking and cycling movements to adhere to the sustrainable transport hierarchy. No change proposed.
SP7/32	SP7	Policy will help mitigate risk of traffic congestion.	1	David Craine	Noted. No change proposed.
SP7/33	SP7	Important to develop walkable neighbourhoods and a sustainable movement network within the Opportunity Area and connecting neighbouring communities	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. In line with the sustainable transport hierarchy, walking and cycling will be at the forefront of the design of streets. No change proposed.
SP7/34	SP7	The plan does not adequately address how rail and bus connections will be delivered to serve the area	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. The rail figure with Policy T5 indicates the rail connections and stations that will be available to serve the development area. The bus figure within Policy T6 shows the bus network which will serve the area. Infrastructure requirements are also set out in OPDC's Infrastructure Delivery Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP7/35	SP7	Support delivery of Old Oak High Street	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
SP7/36	SP7	There is not a proposal to provide a transport link between each of the 'Places'. This will be particularly important to interconnect key residential areas with the major elements of Social Infrastructure, if in the case of medical and educational facilities, these are to be centralised. A unified transport system covering each of main streets shown on Figure 3.8 – Proposed Connections, would be a good starting point.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The transport networks are shown in the figures associated with policies T2, T3, T5 and T6 and in the Infrastructure Delivery Plan have been developed to ensure there are connections between all of the "Places".
SP7/37	SP7	Need to recognise that the area is not flat	13	Hammersmith Society, Wells House Road	No change proposed. OPDC recognises that there are signficant level challenges across

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	the site. All walking and cycling networks will have a minimum of 1 in 20 gradient to ensure the site is accessible.
SP7/38	SP7	The plan should not be considered postively prepared unless it includes a plan for an internal transit system.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. SP7 and the transport policies indicate the proposals for the transport network across Old Oak and Park Royal, which provides for a variety of means of travel across the area.
SP7/39	SP7	Policy is not positively prepared as it does not adequality promote modal shift from car use, and text should be added to require the active marketing of public transport in new development to rectify this.	1	John Cox	No change proposed. The Local Plan promotes modal shift from car use by ensuring the healthy streets approach is the overarching policy for all transport proposals. T4 promotes low and car free development. SP7, T 1, T2, T2, T5 and T6 promote walking, cycling and public transport use.
SP7/40	SP7	Policy SP7 is too detailed and it is questionable whether it should be a strategic policy.	13	Old Oak Interim Neighbourhood Forum, Wells House Road	No change proposed. Policy SP7 outlines the wider plans across the area to connect people and places. It is appropriate as a

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Strategic Policy as it deals with the overarching aims to ensure good connectivity across the area. The Places and transport policies then provide more detail.
SP7/41	SP7	Support minimising need to travel but this cannot be achieved by resisting mixed use on strategic industrial location.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the area's London-wide role and the ongoing demand for industrial space. A mix of uses within SIL would undermine its core function as a reservoir or land for industrial uses. Transport policies seek to limit car parking and would require travel plans and transport assessments.
SP7/42	SP7	Need to recognise that passage along new streets may not be straightforward	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. OPDC aims to deliver high quality, legible streets to ease navigation.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP7/43	SP7	Walking distances between the stations are excessive compared to most transport interchanges.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan shows the connections between stations which will be as direct as possible. A range of modes will be available for people to have choice with regards to the way they interchange between stations.
SP7/44	SP7	Allowing mixed use development in SIL would have a positive impact on travel patterns.	14	TITRA; Midland Terrace, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the area's London-wide role and the ongoing demand for industrial space. A mix of uses within SIL would undermine its core function as a reservoir or land for industrial uses. Transport policies seek to limit car parking and would require travel plans and transport assessments.
SP7/45	SP7	Plan for categories of users with different needs and travel objectives	13	Grand Union Alliance, Wells House Road Residents Association,	No change proposed. The Sustainable Transport Hierachy and Healthy Streets policies in SP7 and T1 promote sustainable

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	travel and includes choice for travellers with different needs.
SP7/46	SP7	Transport improvements should be part of a clear masterplanned approach	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
SP7/47	SP7	Old Oak Common Station must have east west access	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is promoting east-west access at Old Oak Common station as indicated in the network figures in SP7 and the transport chapter. OPDC is promoting this and working with HS2 Ltd to deliver this.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/48	SP7	Scale and the proposals for the A40 and A406 need outlining.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Both the A40 and A406 are strategic roads and under TfL's jurisdiction. The A40 study is provided as a supporting study to the local plan which outlines the proposals that were investigated by TfL.
SP7/49	SP7	Park Royal transport improvements are required and provision of grade separation is not the answer.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Grade separation is not a proposal being investigated by OPDC for Park Royal. The Park Royal Transport Strategy is provided as a supporting study and outlines the transport proposals that have been investgated. Required improvements are referenced in OPDC's Local Plan and in the Infrastructure Delivery Plan.
SP7/50	SP7	Deliverability of Old Oak High Street if Elizabeth Line Depot is retained during plan period	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	Change proposed. The Local Plan no longer shows the Elizabeth Line depot as being a development site within the plan period but OPDC will work with Crossrail to investigate future connections across the Elizabeth Line depot.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP7/51	SP7	Lack of precedents for similar scale car free developments.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No Change proposed. OPDC is encouraging car-free development to ensure people travel sustainably. There are a number of precedents for car free developments in King's Cross, Vauxhall and Stratford.
SP7/52	SP7	Innovative scenarios should be considered and made publicly available.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. A key policy in SP7 and T1 is to ensure streets are future-proofed for changes in the surrounding context, life-style and technological changes. Innovative transport interventions like autonomated vehicles and drones will be investigated for Old Oak and Park Royal when more information is known about them.
SP7/53	SP7	Align transport policies with those of boroughs, Transport for London and other transport operators to reduce existing congestion in the surrounding road network.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No Change Proposed. OPDC worked collaboratively with TfL, Network Rail, HS2 Ltd and the local boroughs to ensure the transport policies were aligned.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP7/54	SP7	Coordination of proposals and discussions with communities for walking and cycling improvements should be carried out.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Consultation has been undertaken as part of the Local Plan and engagement will be undertaken as part of future planning applications.
SP7/55	SP7	Refer to HS2-WLL link and raft	1	West London Line Group	No change proposed. These proposals are not being carried forward by DfT and therefore OPDC is not in a position to include these proposals in the Local Plan
SP7/56	SP7	Refer to conference/exhibition/performance facility above the raft	1	West London Line Group	No change proposed. These proposals are not being carried forward by DfT and therefore OPDC is not in a position to include these proposals in the Local Plan. However, the Local Plan supports the potential for catalyst uses, which could include a convention facility, subject to the proposal according with other relevant planning policy.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/57	SP7	Seamless interchange will not be delivered and OPDC must meet the ever growing demand for rail in general and especially between these three facilities (Clapham Junction, Heathrow and OOC).	1	West London Line Group	Noted. OPDC is working with Network Rail, TfL, DfT and HS2 Ltd to create a high quality interchange between all stations in Old Oak and Park Royal.
SP7/58	SP7	Support the principle of healthy streets however connection to overground stations will be windy	1	West London Line Group	Noted. Policy D6 requires consideration to be given to amenity, which includes wind.
SP7/59	SP7	Objections to the Old Oak Common Lane station bridge	15	Old Oak Interim Forum and TITRA and Midland Terrace, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan shows an east-west connection between North Acton and the OOC station via the Overground station. Technical work undertaken by TfL indicated this connection should be a bridge. The connection is currently unfunded and further work is required to understand the form of it that will be delivered.
SP7/60	SP7	Concern regarding the position of Old Oak High Street and it not adequately serving Harlesden Town Centre/ removing activity on Station Road and to the west of Willesden Junction station routing up to Harlesden.	1	London Borough of Brent	No change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local Plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP7/61	SP7	Request for early delivery of enhancements to Willesden Junction station and connections	3	LBB, LBHF, HGH Planning on behalf of Queens Park Rangers Football Association and Stadium capital	No change proposed. OPDC shares the aspiration to enhance Willesden Junction station and deliver connections at the earliest opportunity. This will require collaborative working with landowners, TfL and Network Rail
SP7/62	SP7	Support the emphasis on the sustainable transport hierarchy and requirement for use of consolidation centres where appropriate. Would encourage OPDC to identify how consolidation centres may be phased across the area.	1	LWARB	No Change Proposed. OPDC does not consider it appropriate to allocate a site as a consolidation centre at this point in time. OPDC requests developers to explore the opportunity to use existing consolidation centres as part of their construction logistics plan.
SP7/63	SP7	Improvements in public transport and improved cycle and walking infrastructure is required to encourage modal shift.	1	Park Royal Business Group	Noted. This is supported in OPDC's sustainable transport hierarchy and the Local Plan sets out the infrastructure enhancements required to help support this modal shift.
SP7/64	SP7	Welcome acceptance that better transport solutions are required to support Park Royal.	1	Park Royal Business Group	Noted.
SP7/65	SP7	Accessible, efficient and affordable public transport spreading out from transport hubs should be a priority to minimise traffic congestion and to promote OPDC's policy of 'no cars'.	1	West Twyford Residents Association	Noted. It is agreed that public transport should be prioritised over private vehicular movements along with the promotion of active transport including walking and cycling.
SP7/66	SP7	The Local Plan does not give recognition of the fact that the new	13	Old Oak Interim Neighbourhood Forum,	No change proposed. Both SP7 and the transport chapter indicate the need for

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		homes and jobs are being implanted in an area of London where the road and public transport networks are under pressure		Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	enhanced infrastructure and to alleviate congestion in order to cater for the transport demands generated by the development.

Strategic Policy SP8: Green Infrastructure and Open Space

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP8/1	SP8	Welcome the positively planned approach to green infrastructure	1	Mayor of London	Noted
SP8/2	SP8	OPDC should refer to engaging closely with neighbouring London Boroughs, on the basis of a duty to co-operate, to ensure that the quality of the "wider environment", including green and open spaces, is not negatively impacted by any nearby developments.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Duty to Cooperate is a statutory duty during plan-making. OPDC has produced a Duty to Cooperate Statement as a supporting study to the Local Plan which sets out the how and when OPDC has engaged with proscribed bodies in the production of the Local Plan. Details on OPDC's approach to the Duty to Cooperate is also included in the supporting text to DI3 and in the annex to the Local Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP8/3	SP8	Diageo considers that the Lakeside Drive site could provide new open space and could be shown on figure 3.11. The diagram should also indicate the existing open space around the Diageo lake within the First Central development.	1	Diageo Plc	No change proposed. The Lakeside Drive site is located between a road and a logistics operation. It ranges in width from 19 metres to 22 metres and is considered to be of sufficient width to provide a range of development typologies and to be deliverable. OPDC does not consider it appropriate through the Local Plan to designate the site as an open space to offset the loss of public open space elsewhere. In accordance with Policy EU1, a proposal would need to come forward and propose any off-set and include measures to ensure that any replacement open space is of an equal or better quantum, quality and access and replaces the lost open space's function.
SP8/4	SP8	The diagram should also indicate the existing open space around the Diageo lake within the First Central development.	13	Friends of WWS, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The existing open space in this location is not publicly accessible. The figure here only shows publicly accessible open space so it is not appropriate for this open space to be shown in the figure.
SP8/5	SP8	In reference to figure 3.11, suggest that the proposed GUC Linear Park should stretch along both the southern and northern	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Securing linear space along the northern edge will be challenging within Park Royal SIL. The proposal is however to provide off-side public open space on Old Oak and in the Channel Gate place.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		boundary of the canal for its entire length			
SP8/6	SP8	Welcome the 30% for open space. Suggest that the indicative areas of search for the new parks illustrated in Figure 3.11 are further refined and supported in Chapter 4. Requirements of the Water Framework Directive should be mentioned.	1	Environment Agency	Change proposed. At this stage it is too early to further refine the exact areas that will be allocated for parks and green spaces. However, further work has been undertaken in Old Oak North to refine the locations of public open spaces in this place. The supporting text to Policy EU3 reference to the Water Framework Directive. The place policies in chapter 4 appropriately reflect the need for the delivery of these local parks.
SP8/7	SP8	Broadly support the policy to provide 30% open space but want to ensure it is achieved.	15	LBHF, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
SP8/8	SP8	Policy is unsound because it doesn't address monitoring	1	Friary Park Preservation Group	No change proposed. OPDC has a set of key performance indicators which include for delivery of or loss of green infrastructure
SP8/9	SP8	Exclude WWS from Local Plan and provide more open space within OO.	1	Sarah Abrahart	No change proposed. Wormwood Scrubs forms part of the OPDC area for planning purposes and therefore must appear in the Local Plan. OPDC is aware of the need to preserve

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Wormwood Scrubs and ensure its long-term role as an important area of MOL that is accessible and open to all the community. OPDC have carried out extensive work to understand how much open space is required to support the new development and is consulting on this provision. The proposal is to include a wide range of public open spaces to accommodate the different needs of the community including provision of 3 local parks and 30% public open space.
SP8/10	SP8	Support provision of 3 new local parks, but clarify funding, ownership and management in Local Plan.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Funding will be secured through a variety of sources in accordance with Policy DI1. OPDC recognises that securing funding for management and maintenance of green spaces is important. Funding mechanisms however will vary across the area and will be subject to negotiations and agreement with a number of parties. OPDC therefore do not consider that it is appropriate to include this in the Local Plan.
SP8/11	SP8	Ensure developers contribute fully to the open space provision	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. These detailed requirements are covered in Policy EU1.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
SP8/12	SP8	Canal forms an important part of the open space network - refer to comment in Places section	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The Grand Union Canal is referenced in the policy.
SP8/13	SP8	Railway embankments should be recognised as part of the open space network	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Noted. Figure 6.3 in policy EU2 identifies sites of importance for nature conservation including railway embankments. The policy recognises the importance of these area and protects them or requires adequate compensatory provision if they are removed.
SP8/14	SP8	Cemeteries should not be regarded as meeting developers open space requirements	13	Hammersmith Society (Mark Walker), Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. Noted. Policy EU1 sets out clear requirements for provision of open space. This policy does not support the use of cemeteries to offset their requirements. Policy EU2 protects existing areas of open space including cemeteries.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP8/15	SP8	Support open space target but it may impact on densities and affordable housing provision	13	Old Oak Interim Neighbourhood Forum (Mark Walker), TITRA (Dave Turner), Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The policy approach is supported by evidence in OPDC's Environmental Standards Study, which has benchmarked against other developments in London. The requirements for open space will need to be balanced against the requirements for affordable housing, in accordance with policy DI1 and any scheme would be assessed in terms of its impact on amenity and other environmental issues.
SP8/16	SP8	Ensure open space remains publicly accessible	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. This would be secured through legal agreements or condition.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP8/17	SP8	Green Infrastructure and Open Space Strategy and Management Plan lacks detail particularly around Green Space Factor and Green Points system implementation	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The name has been changed to the Urban Green Factor in line with the new policy in the draft London Plan (2017). The London Plan provides guidance on the application of the Urban Greening Factor and further SPG is proposed by the Mayor on guidance and its application.
SP8/18	SP8	Work with the boroughs to create additional green infrastructure beyond the OPDC area	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy EU1 sets out clear requirements for provision of open space. OPDC will work with the host boroughs to support green space provision where feasible. However, OPDC is not the planning authority for the area outside of OPDC and therefore its role is more limited in terms of green infrastructure provision.
SP8/19	SP8	Lack of guidance for active play	1	Grand Union Alliance	Change proposed. Policy D9 provides guidance for multi-functional play. The supporting text has been strengthened to make reference to encouraging active lifestyles. Mayor policy also applies to the area. London Plan policy has not been repeated here and the Mayor's Play and Informal Recreation SPG also applies to the area.

Strategic Policy SP9: Built Environment

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP9/1	SP9	There should be a hundred metre buffer between existing communities and new developments.	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the need to deliver appropriate standards of amenity for existing residential areas as being an important component in the design and delivery of development proposals. These proposals will need to be considered on a case by case basis. As such Local Plan policies SP9, D4, D5 and D6 with London Plan policies and national guidance will be used to ensure existing residential areas benefit from appropriate standards of amenity.
SP9/2	SP9	The document does not include a density map as per the 1st draft Local Plan. Should revert to having the density ranges that were in the Reg 18 draft Local Plan	13	Wells House Road Residents Association, Midland Terrace Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, St Quintin and Woodlands Neighbourhood Forum	Change proposed. Average density information has been provided within the supporting text to SP9. OPDC's Tall Building Statement provides information for the definition and location of tall buildings within the OPDC area.
SP9/3	SP9	Wish to be involved in the development of a list of community assets	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted. Assets of Community Value are nominated by community groups and designated by the local Borough. Once

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	designated, ACVs can be considered as material considerations in planning decisions.
SP9/4	SP9	Wish for the area not to become an area of poor quality design	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC wishes to support the delivery of a high quality built environment. This is embedded in the Local Plan's Spatial Vision and Spatial Vision Narrative 1. To realise this aspiration, national guidance, London Plan policies and relevant Local Plan policies such as SP2, SP9, D1, D2, D4 and D5 will be implemented.
SP9/5	SP9	The densities proposed in the Local Plan exceed established guidelines. The Plan is therefore unsound.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF. The draft London Plan does not include a density matrix as it has been recognised by the Mayor that it did not appropriately recognise local context. The draft London Plan policy D6 recognises that appropriate densities should be determined through consideration of the site context, access

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					to public transport accessibility and the capacity of surrounding infrastructure.
SP9/6	SP9	The plan is not specific about what are acceptable building heights or what is meant by tall buildings. Without this, the plan lacks transparency and therefore does not accord with the NPPF. The indicative densities are buried in the DCS and are not clearly set out in the Local Plan	14	TITRA, Midland Terrace Residents Association, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Policies D5 and SP9 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8(B) as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings, but within Old Oak North and Old Oak South there is a need for flexibility in the approach to achieving homes and jobs targets that will enable a response to site specific circumstances and the longer term development trajectory. No change proposed. OPDC considers policies SP9 and D5 are consistent with the requirements of the NPPF. Density ranges are defined within the DCS to

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					define the development capacity of the OPDC area in accordance with national guidance. Policies SP9 and D5 provide guidance for the location of sensitive areas where densities and buildings should provide an appropriate response.
SP9/7	SP9	Support policies requiring development to respond to local context, in particular sensitive locations such as open spaces.	16	The Friends of Wormwood Scrubs, David Craine, ArtWest, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
SP9/8	SP9	Views from the Wormwood Scrubs should be given appropriate protection, and the Plan should clearly restrict building heights along the northern boundary of the scrubs.	14	The Friends of Wormwood Scrubs, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. Policy D7 provides guidance for managing the impact of development proposals on views from Wormwood Scrubs. Local Plan policies SP9, D5, P1 and P1C1 alongside London Plan policy 7.7, national guidance provides guidance for the location of building heights along the southern edge of Old Oak South. Policy P1 identifies that tall buildings should be located around Old Oak Common Station with buildings heights

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	appropriately responding to Wormwood Scrubs as Metropolitan Open Land.
SP9/9	SP9	Welcome policies requiring development to respond to canal as sensitive location and heritage asset, but concerned this is not justified by evidence Grand Union Canal Massing and Enclosure Note.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P3 provides guidance for "delivering heights of generally 6 to 8 storeys" with "opportunities for tall buildings at key crossing points" along the Grand Union Canal. This is based on the recommendations of the Grand Union Canal Massing and Enclosure Note. This note considers enclosure of potential development at points along the canal. It recognises that enclosure is one element in guiding building heights alongside London Plan, Local Plan and national guidance. The recommendation of delivering a range of generally 6 to 8 storeys that is embedded in Policy P3 is considered to be sufficiently flexible to enable the delivery of heights above and below this range.
SP9/10	SP9	Midland Gate site should not be shown as existing residential area due to recent commercial use.	1	Castlepride Limited	Change proposed. Figure 3.14 has been amended to remove Midland Gate from the depicted residential area.
SP9/11	SP9	'Nationally listed' should be 'statutory listed'	1	London Borough of Ealing	Change proposed. Key for Figure 3.14 has been corrected to state Statutory Listed.
SP9/12	SP9	Support approach to design of the built enivornment to optimise wider benefits	1	Association for Consultancy and Engineering (ACE)	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP9/13	SP9	Europa Studios should not be identified as a non-designated heritage asset.	1	Old Oak Park Limited	Change proposed. To reflect its current status of not being on the Local Heritage Listings, Europa Studios has been removed as a Local Heritage Listings. However, this does not prevent it from being considered as a non-designated heritage asset.
SP9/14	SP9	Policy should state that if loss of assets is proposed then justification is required in accordance with policy D8	1	Old Oak Park Limited	No change proposed. This is dealt with in Policy D8 and OPDC does not consider it appropriate to repeat this here.
SP9/15	SP9	Agreement that development needs to be optimised	1	A40 Data Centre B.V	Noted.
SP9/16	SP9	Agreement that proposals should provide appropriate amenity	1	A40 Data Centre B.V	Noted.
SP/17	SP9	Refer to listed buildings in RBKC including Kensal House and Day Nursery and St Charles Hospital and Kensal Cemetery being a Grade 1 Listed Registered Park and Garden.	1	Royal Borough of Kensington and Chelsea	Change proposed. Kensal House and Day Nursery, St Charles Hospital have been depicted as Statutory Listed assets. Kensal Cemetery has been depicted as Grade 1 Listed Registered Park and Garden.
SP9/18	SP9	References to 'High quality' should be given strong definition in policies, measurable specific targets, and relevant key performance indicators to clarify OPDC's expectations, and to define what 'success' will look like	1	Environment Agency	No change proposed. Policy SP9 defines what the highest design quality should comprise. Relevant elements of this policy are reflected in the Local Plan Key Performance Indicators.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP9/19	SP9	Applicants should be aware of other proposals in development that are in proximity. Acknowledgement of this in para 3.93 would be beneficial to the built environment.	1	London Borough of Hammersmith and Fulham	Change proposed. Supporting text to SP9 has been amended to reflect cumulative impacts.
SP9/20	SP9	SP9 is sound, positively prepared and / or legally compliant.	3	Raymond Gill, Friary Park Preservation Group, A Somefun	Noted.
SP9/21	SP9	Policy is unsound (no reason given)	1	Sarah Abrahart	No change proposed. OPDC considers policy SP9 to be sound.
SP9/22	SP9	Densities are to high and exceed London Plan targets.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. In parts of the OPDC area, residential development is likely to exceed the figures set out in the London Plan's density matrix; however, this approach is supported by paragraphs 7.5.7 and 7.5.8 in the Mayor's Housing SPG and in the Old Oak and Park Royal OAPF. The draft London Plan does not include a density matrix and requires proposals to be optimised through a design-led approach.
SP9/23	SP9	Support principle of policy but design is subjective and have not been impressed with schemes granted to date	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	Noted. OPDC is committed to developing a high quality built environment. The Local Plan contains a range of detailed policies to ensure that development delivers high quality design and high standards of sustainability.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP9/24	SP9	Concerns with reference to high densities and tall buildings. Heights should be under 20 storeys and densities below 350 units per hectare.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. OPDC's Tall Building Statement provides information supporting this approach. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations. OPDC's Development Capacity Study sets out the methodology undertaken to define the development capacity of the OPDC area based on Local Plan supporting studies and development scheme precedents that meets London Plan homes and jobs targets.
SP9/25	SP9	Support approach to heritage assets and designation of the Cumberland Park Factory Conservation Area	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP9/26	SP9	OPDC should compile a list of unregistered heritage assets for the whole area.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC has consulted on its proposed local heritage listings.
SP9/27	SP9	OPDC's Place Review Group should have representation from community members	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	OPDC's Place Review Group comprises a panel of built environment experts to provide independent advice for development proposals. A community forum has been established to inform the development management process.
SP9/28	SP9	Planning applications are unduly influencing policy development. This and policies DI1 and DI2 are unjustified.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The Local Plan has been developed based on a significant number of supporting studies to provide an evidence based approach to ensure development of Old Oak and Park Royal is plan-led. OPDC considers

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	policies DI1 and DI2 are sound based on robust and deliverable evidence base.
SP9/29	SP9	Insufficient justification for tall buildings and demonstration that this will deliver lifetime neighbourhoods has been provided. The Plan does not provide enough clarity on future building heights, locations of tall buildings or definitions of tall buildings. A map of tall building locations should be provided. Indicative building heights of 40 storeys + are not justified. Density information in DCS is not reflected in the Local Plan This does not conform with London Plan policy 7.7 or NPPF para 58 and 59.	28	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Wells House Road Residents Association, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Hammersmith Society, ArtWest, St Quintin and Woodlands Neighbourhood Forum, Nicky Guymer, Bruce Stevenson, Tom Ryland, Oonagh Heron, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, TITRA, Grand Union Alliance, Midland Terrace Residents, Nye Jones	Change proposed. Further wording has been inserted into the supporting text of SP9 to clarify the average densities expected in the OPDC area based on DCS outputs to achieve homes and jobs targets. Change proposed. Policies D5 and SP9 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8(B) as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					but within Old Oak North and Old Oak South there is a need for flexibility in the approach to achieving homes and jobs targets that will enable a response to site specific circumstances and the longer term development trajectory. No change proposed. OPDC considers policies SP9 and D5 are consistent with the requirements of NPPF paragraphs 58 and 59.
SP9/30	SP9	Only MOL and SINCS are included in map 3.14. Other spaces should be included.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The map supporting policy SP8 has been amended to include all publicly accessible open space.
SP9/31	SP9	Carry out a detailed analysis of actual land available for housing supply once all the other requirements for land have been taken into account, e.g.: employment, transport (particularly roads), social infrastructure and green spaces.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. OPDC's Development Capacity Study has taken into account the need to provide non-residential floorspace and the need for public realm and streets. The capacity figures are based on the net developable area.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP9/32	SP9	Support proposals for new bridges and underpasses, which must be designed to a high standard and need to be perceived as safe to use	1	Brent Cyclists	No change proposed. ODPC will promote the use of high quality materials to ensure bridges and underpasses are well designed and therefore well used

Strategic Policy SP10: Integrated Delivery

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP10/1	SP10	Service providers should be party to all funding and delivery mechanisms.	1	Hammersmith and Fulham Council	Noted.
SP10/2	SP10, Figure 3.16	Figure should be amended to remove Lakeside Drive as a 0-5 year development site, but include the open space on Twyford Abbey Road	1	Diageo Plc	No change proposed. Officers do not propose to designate open space at Twyford Abbey Road as a development site and land at Lakeside Drive as an open space. Figure 3.16 therefore does not require amending on this basis.
SP10/3	SP10	Support the principle of bringing forward development in advance of the phasing identified in Figure 3.16	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Noted.
SP10/4	SP10	Welcome the positively planned approach to physical and social infrastructure	1	Mayor of London	Noted

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP10/5	SP10	Welcome recognition in SP10 that developers should contribute 'appropriately and proportionately to infrastructure.	1	Old Oak Park Ltd	Noted.
SP10/6	SP10, Para 3.109	It should also be recognised that the equalisation mechanism would be applied between early sites that come forward ahead of new infrastructure yet rely on it, and later developments which provide the infrastructure.	1	Old Oak Park Ltd	Change proposed. Further wording has been inserted to clarify the workings of the equitable equalisation mechanism, including that it would apply to early sites coming forward in advance on on-site infrastructure, the sites delivering the infrastructure and later sites contributing towards that infrastructure through a retrospective pooling contribution.
SP10/7	SP10	Support Policy SP10	18	Healthy Urban Development Unit, Environment Agency, Hammersmith and Fulham Council, Friary Park Preservation Group, Hammersmith Society, Education and Skills Funding Agency, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
SP10/8	SP10, Para 3.105	Support para 3.105 and will seek to support OPDC to ensure development contributions are sought for specific and wider infrastructure needs.	1	Hammersmith and Fulham Council	Noted.
SP10/9	SP10	Support requirement for an Infrastructure Delivery Strategy, but reference should be made to service providers being involved in discussions in para 3.109	1	Hammersmith and Fulham Council	Change proposed. Text has been added to the paragraph to require developers to hold early discussions with infrastructure service providers.
SP10/10	SP10, 3.111	Supports joint working to manage impacts on amenity and on the highway network	1	Hammersmith and Fulham Council	Noted.
SP10/11	SP10	The policy is not effective as delivering development as early as possible will not realise wider benefits and support sustainable development.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The policy is considered effective. Delivering development early will help meet the need for homes, jobs and services in the area and also help to meet more strategic needs. Policies across the plan require that impacts of development are appropriately mitigated. This includes securing the neccessary infrastructure to support development (SP10 and DI2), mitigating impacts during construction (SP10 and T8) and applying the agent of change principle when considering issues such as noise and vibration (EU5).

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SP10/12	SP10	When considering infrastructure, need to factor that there will be demands arising from other growth outside of the OPDC area	1	West London Line Group	Noted. In accordance with the Duty to Cooperate, OPDC has been in discussions with other local authorities and public bodies to understand whether needs outside of OPDC's area are also required to met through planning policy and where necessary and appropriate, these requirements have been addressed in the Local Plan.
SP10/13	SP10, Figure 3.16	Twyford Tip site should be identified as being deliverable within 0-5 years in the phasing diagram	1	Ashia Centur Limited	No change proposed. OPDC has undertaken a study looking at the viability of delivery of development options on the Twyford Tip site. This has shown that the site is not likely to be viable to be delivered for development, given its significant contamination. OPDC therefore does not consider the site to be deliverable within the next 5 years.

4. Places

Introduction

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P/1	Introduction	Place policies P7 and P8 should cross reference to Policy DI1	1	Segro	No change proposed. The introduction to the places identifies that all place policies have policy links to all delivery and implementation policies.

All Place Policies

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P/2	ALL	Place policies should be identified as non-strategic policies.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as

					how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P/3	ALL	Air quality guidance should be included in place policies. Air quality needs to be monitored.	15	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton; John Cox; Catherine Sookha;	No change proposed. Place specific air quality guidance is provided where OPDC's Air Quality Strategy has identified specific locations for interventions. Guidance for air quality for the whole OPDC area is provided in Policy EU4. Air quality monitoring is carried out by Brent, Ealing and Hammersmith and Fulham Council's as part of the designated Air Quality Management Areas that cover the entirety of the OPDC area.
P/4	ALL	The 'Places' chapter should provide a clearly defined spatial vision, together with proposals which seek to actively promote and facilitate the delivery of industrial intensification.		CBRE (on behalf of SEGRO);	No change proposed. The vision and policies already support intensification across Park Royal.
P/5	ALL	Support references to benefits of circular economy in the Places chapter regarding the exchange of goods and services and resource use.	1	LWARB	Noted.
P/5	ALL	The Place specific policies should make specific mention	1	Sport England	No Change proposed. Place policies only deal with matters specific to each place. The design

		to Active Design so that principles are engrained in new development.			chapter deals with supporting active lifestyles, as does policy SP3.
P/6	ALL	Targets for place policies are unjustified	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the homes and jobs targets for each place are justified. These are based on development capacity information set out in OPDC's Development Capacity Study. This has been developed in accordance with National Planning Practice Guidance for Housing and Economic Land Availability Assessments. The Development Capacity Study is based on development capacity information set out in the Old Oak North Development Framework Principles, the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document provided specific information for development capacity for the Development Capacity Study.
P/7	ALL	The policies are too detailed and should instead be replaced by area action plans and neighbourhood plans	15	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does

					consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P/8	ALL	Place policies P4, P5 and P7 are too vague about protecting existing open space.	1	Sport England	No change proposed. The requirements for protecting open space are set out in Policies SP8 and EU1. Place policies only deal with place specific policy issues.
P/9	ALL	The large HGV-friendly street signs on the Slough trading estate should be learnt from.	1	Park Royal Business Group	No change proposed. The need for improved wayfinding is already covered by P4, P5 and P6.
P/10	ALL	There are issues with planning enforcement, transport links, infrastructure and road safety in Park Royal	1	Praveen Anand	No change proposed. OPDC has full planning enforcement powers and will act on individual cases where information relating to a breach of planning control has been provided. The Park Royal Place and Transport Policies all recognise the need for transport and infrastructure improvements including supporting improved bus services and walking/cycling routes. Policy P7 covering North Acton supports the delivery of a mix of town centre uses to help support the needs of local communities.
P/11	ALL	Support provision of green infrastructure across Park Royal, including food growing	15	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	Noted.

				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Old Oak Neighbourhood Interim Forum; Regents Network; Turley (on behalf of Ashia Centur Limited)	

Place Policy P1: Old Oak South

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1/1	P1	The Local Plan should support the delivery of a conference/exhibition/performance facility close to Old Oak Common station	1	West London Line Group	No change proposed. The Local Plan supports the creation of a major town centre along Old Oak High Street and within Policy SP6, supports the potential for catalyst uses, which could include a conference/exhibition/performance facility. However, OPDC does not propose to allocate land for such a use and considers it appropriate to maintain flexibility over what catalyst uses may be appropriate in the area and judge any proposals against relevant planning policy and specifically Policy TCC8 (Catalyst Uses).
P1/2	P1	Old Oak South cannot deliver high density development with tall buildings with the current HS2 Ltd plans to naturally ventilate the station. The Local Plan cannot therefore be considered justified or effective	1	HS2 Ltd.	Change proposed. A decision has now been taken by DfT and HM Treasury to mechanically ventilate the station. Notwithstanding this, OPDC has undertaken more detailed development capacity modelling that has resulted in a reduced quantum being identified for the HS2 station triangle site and this change in capacity has been

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					reflected in the Old Oak Common station and surrounds allocation.
P1/3	P1	Acknowledge that Oaklands South development delivering Park Road can help open up Old Oak North	1	Genesis	Change proposed. Supporting text to Policy P1 has been amended recognising the role of Park Road in providing access to Old Oak North.
P1/4	P1	Development capacity proposed on the HS2 station and surrounds is not justified. This level of development would not be supported by enabling works currently proposed by HS2. Suggest that policies are drafted more flexibly to allow for a range of development scenarios.	1	HS2 Ltd.	Change proposed. The capacity for the HS2 triangle site has been revised following further development capacity work to align with the proposed HS2 enabling works.
P1/5	P1	Figure 4.3 does not show Wormwood Scrubs Street, despite clear references to the delivery of this street in the policy and supporting text.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC has labelled Wormwood Scrubs Street on figure 4.3.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1/6	P1	Disagree with the need for more than the green bridge connection between Old Oak and Wormwood Scrubs, and don't see the need for a cycling route to the Scrubs from Old Oak. Further feasibility work is required to support the entrance to Wormwood Scrubs from the bridge.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Wormwood Scrubs Act (1879) states that Wormwood Scrubs should be held “upon trust for the perpetual use thereof of the inhabitants of the metropolis for exercise and recreation”. Providing access to the Scrubs for the new residents, employees and visitors within Old Oak accords with the Act; however, any access would need to be sensitively designed to minimise its impact on the ecological value of the Scrubs and would need full agreement from the Wormwood Scrubs Charitable Trust.
P1/7	P1	Unclear on how development will "celebrate" the Scrubs.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Celebrating Wormwood Scrubs is envisaged to be delivered by the policies within the Local Plan including its conservation and enhancement.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1/8	P1	Place policies for P1, P2 and P11 are too vague with regards to financial contributions for Harlesden Town Centre from new commercial development in the Old Oak commercial centre. Policies should clearly require that contributions will have to be secured.	2	London Borough of Brent, Harlesden Neighbourhood Forum	Change proposed. Policy P1(g) and supporting text have been relocated to policy TCC1.
P1/9	P1	The Elizabeth Line depot is not likely to be brought forward for the delivery of homes and jobs within the plan period. Reference to it being delivered within the plan period should be removed from the Local Plan.	3	Mayor of London, Transport for London (Group Planning), Transport for London (Commercial Development)	Change proposed. OPDC agrees that it is unlikely that this site will be brought forward in the Plan period. The development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan. The Old Oak South allocation has also been revised to remove the Elizabeth Line and retitled Old Oak Common station and surrounds. The Local Plan continues to support the potential for the earlier delivery of the Elizabeth Line depot during the plan period and also in the longer term.
P1/10	P1	Amend wording to reference development of business case for potential bridge connections to the north in addition to Old Oak High Street.	1	Transport for London (Group Planning)	Change proposed. Wording has been added to policy P1 supporting text to reflect outputs of the Old Oak North Development Framework Principles in defining connections between Old Oak South and Old Oak North.
P1/11	P1	Oaklands supports delivery of Place vision, and commencement should be acknowledged.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	No change proposed. Following completion of the Oaklands development it will be depicted as an existing residential neighbourhood.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1/12	P1	It is appropriate that land in Old Oak South be developed to a high density. Tall buildings will be appropriate.	1	Mayor of London	Noted. This is supported through policies in the Local Plan.
P1/13	P1	Consider ‘sensitively respond’ to be more appropriate than ‘appropriately responding’	1	London Borough of Hammersmith and Fulham	No change proposed. Existing residential areas and Wormwood Scrubs are identified in Policy SP9 to be sensitive locations. 'Appropriately responds' is consistent with the approach taken in SP9 with regards to building heights and is considered to provide sufficient policy guidance to ensure building heights respond to sensitive locations.
P1/14	P1	Policy is sound	1	Friary Park Preservation Group	Noted.
P1/15	P1	Plans should reflect the green space proposed by HS2 Ltd. between Wells House Road and Old Oak Common Station.	12	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Wells House Road Residents Association, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that this is an important development site to optimise development capacity around the station. Development on this site is supported by HS2 Ltd, subject to it not conflicting with the effective operation of the station.
P1/16	P1	Definition for a "community hub" should be included for clarity.	1	Diocese of London	Noted. Reference to community hubs have been replaced to referencs to OPDC's Infrastructure Delivery Plan. This provides information for

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					requirements for community facilities. These are defined in the glossary.
P1/17	P1	Policy is unsound	1	Sarah Abrahart	No change proposed. OPDC considers Policy P1 to be sound.
P1/18	P1	Policy should state that residential enclaves are not overshadowed by development that is out of scale with them or more than six storeys in height.	19	Nicky Guymer, Bruce Stephenson, Mark Walker, Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the need to deliver appropriate standards of amenity for existing residential areas as being an important component in the design and delivery of development proposals. These proposals will need to be considered on a case by case basis. As such Local Plan policies SP9, D4, D5 and D6 with London Plan policies and national guidance will be used to ensure existing residential areas benefit from appropriate standards of amenity.
P1/19	P1	The Crossrail depots cannot be redeveloped and the HS2 station site cannot accommodate significant capacity without being decked which HS2 do not support.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara,	Change proposed. OPDC agrees that it is unlikely that this site will be brought forward in the Plan period. The development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan. The Old Oak

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Without these two issues being addressed, the Plan is unsound.		Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	South allocation has also been revised to remove the Elizabeth Line and retitled Old Oak Common station and surrounds. The Local Plan continues to support the potential for the earlier delivery of the Elizabeth Line depot during the plan period and also in the longer term.
P1/20	P1	Concerns about design of planned Old Oak Common Station and provision of bus routes to the station	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC will work closely with HS2 to deliver a state of the art, exceptionally designed 21st century multi-modal transport interchange. Policy P1C1 provides guidance to inform the design of the station.
P1/21	P1	A design competition for the Old Oak Common Station should be carried out	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	Noted. OPDC will work closely with HS2 to deliver a high quality design process.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P1/22	P1	Alternative sites for a primary school should be considered.	1	Transport for London (Commercial Development)	No change proposed. Policy TCC4 provides a mechanism for identifying alternative primary school locations. The need for an approach which responds to change in development and population requirements is set out in the supporting text. As identified in Policy SP10, an equitable equalisation mechanism and retrospective pooling contribution mechanism will be used to fund the delivery of facilities.
P1/23	P1	Costs of delivering decking above the depot should be considered. Statement of Common Ground sought.	1	Transport for London (Commercial Development)	Change proposed. OPDC has removed the delivery of development on the Elizabeth Line depot from the Plan period. As such the consideration of the costs of decking is beyond the role of the Local Plan. OPDC will continue to work with TfL to explore deliverability of the site.
P1/24	P1	Development of sites before the Elizabeth Line Depot should not preclude its development.	1	Transport for London (Commercial Development)	No change proposed. Policy SP10 provides policy to ensure all development complements and does not unduly restrict development on adjacent and connected sites.
P1/25	P1	Design of Old Oak Common Station should not focus on delivering an iconic or feature	1	Transport for London (Commercial Development)	No change proposed. OPDC considers that P1C1 Vision and Policy P1C1 provide appropriate guidance to ensure the station is integrated with surrounding areas.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		standalone station to support development around the station.			
P1/26	P1	Question if a specific number of jobs is required and whether these will be deliverable given uncertainty around the Crossrail depots, decking around the station and changes in the office market.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. To ensure OPDC can demonstrate the Local Plan is in general conformity with the London Plan employment target. The economic floorspace from which job figures are derived is required to be defined in accordance with NPPF paragraph 161 and NPPG guidance on Housing and Economic Land Availability Assessments. Any amendments to development capacity will be reflected in revisions to be Local Plan and related supporting evidence studies.
P1/27	P1	Support meanwhile uses in Old Oak South	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Jeremy Aspinall, Thomas Dyton	
P1/28	P1	Policy should specify building heights in around Old Oak Common Station	15	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Old Oak Common Station and surrounding areas are identified as longer term development sites. As such, the provision of policies defining specific building heights at this point in time is not considered to be appropriate. Policy SP9 identifies this area as appropriate for tall buildings in principle but also continues to require proposals to accord with all relevant policies in national guidance, the London Plan and the Local Plan.
P1/29	P1	The rail interchange will be a focus for development but the station cannot form a heart for the development.	1	Regents Network	No change proposed. OPDC considers that Old Oak Common Station has the potential to be a destination at the heart of a new major town centre and commercial centre reflecting the development potential and high levels of public transport accessibility.
P1/30	P1	Figure 4.4: Kings Cross is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Kings Cross to be an appropriate precedent.
P1/31	P1	Figure 4.5: More London is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers More London to be an appropriate precedent.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1/32	P1	Figure 4.6: Bankside is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Bankside to be an appropriate precedent.
P1/33	P1	Figure 4.7: St. Andrews, Bow is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers St. Andrews, Bow to be an appropriate precedent.
P1/34	P1	Figure 4.9: Rotterdam Central Station is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Rotterdam Central Station to be an appropriate precedent.
P1/35	P1	Figure 4.10: St. Pancras Station is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers St. Pancras Station to be an appropriate precedent.
P1/36	P1	Figure4.11: Lierge-Guillemins Station is an inappropriate precedent	1	Regents Network	No change proposed. OOPDC considers Lierge-Guillemins Station to be an appropriate precedent.
P1/37	P1	Consultation with Friends of the Wormwood Scrubs and agreement of the Wormwood Scrubs Charitable Trust and Hammersmith and Fulham Council are essential for any proposals for the Scrubs.	14	TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The supporting text sets out OPDC's commitment to agreeing any proposals with the Wormwood Scrubs Charitable Trust and Hammersmith and Fulham Council and consulting with the Friends of Wormwood Scrubs.
P1/38	P1	The vision for a commercial centre on the Crossrail Depot site is not deliverable, and the site will be a	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC is seeking to deliver a range of projects to improve the environment and activate areas along the Grand Union Canal,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		blight on the canal and wider area for many years. Options for full or partial relocation should be outlined.			including north of the Elizabeth Line Depot. This is supported by Policy TCC9 in the Local Plan. Change proposed. OPDC agrees that it is unlikely that this site will be brought forward in the Plan period. As such, the development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan. The Old Oak South allocation has also been revised to remove the Elizabeth Line and retitled Old Oak Common station and surrounds. The Local Plan continues to support the potential for the earlier delivery of the Elizabeth Line depot during the plan period and also in the longer term.
P1/39	P1	The ideas about access from the built up areas into the Wormwood Scrubs are not clearly described in the Local Plan.	1	Wormwood Scrubs Charitable Trust	No change proposed. The figure sets out the indicative location of new and improved access points to Wormwood Scrubs. This level of detail is appropriate for the role of the Local Plan.
P1/40	P1	The Trust welcomes the statement that the OPDC will agree any proposals with the Wormwood Scrubs Charitable Trust.	1	Wormwood Scrubs Charitable Trust	Noted.
P1/41	P1	Entrance to Old Oak Common Station should be from the east to Scrubs Lane.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier,	No change proposed. OPDC is working closely with HS2 Ltd and DfT to ensure the HS2 station provides appropriate access.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P1/42	P1	Access from Old Oak Common Station to Wormwood Scrubs should not be provided.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The plan indicates a longer term access south from Old Oak station to Wormwood Scrubs to cater for demand from the south to access the station and the new amenities being delivered in Old Oak.
P1/43	P1	Gradient and design of Old Oak High Street. Retention of Elizabeth Line Depot will require a long bridge over the depot.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. Connections to Old Oak North, via Old Oak Street can be achieved to the east of the depot where bridging requirements are much shorter.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

P1C1: Old Oak Common Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P1C1/1	P1C1	An additional level should be created above ground in the Old Oak Common station to connect in local rail services	1	West London Line Group	No change proposed. This option was explored as part of Grip 2 work for the London Overground stations. Due to high cost and impact on services, this option is not supported by TfL, DfT or HS2 and OPDC does not propose to safeguard land for this option in the Local Plan.
P1C1/2	P1C1	The Local Plan should specify the amount of structural foundations required within the Old Oak Common station	1	West London Line Group	No change proposed. Structural foundations are not a planning matter, being governed bu Building Regulations and in any case, for Old Oak Common Station are a matter for the London - West Midlands Act 2017.
P1C1/3	P1C1	Old Oak Common station policy should support enhanced access to and from the OPDC area and facilitate the widest possible range of journey options	1	West London Line Group	No change proposed. The need for the Old Oak Common station to deliver excellent local, regional and national connections is referenced in the Vision for Old Oak South. The importance of the connectivity brought by the station is also referenced in the Spatial Vision and Policy SP1.

P1C1/4	P1C1	Para OOC.7 should clarify that the 250,000 passengers figure is per day. Question this assumption as it may not include population assumptions from Old Oak and Park Royal and evidence shows that historic estimates of interchange numbers underestimate.	1	West London Line Group	Change proposed. Wording has been inserted to clarify that the 250,000 passenger figure is per day.
P1C1/5	P1C1	Time period for station demand figures needs to be clarified.	1	Transport for London (Group Planning)	Change proposed. It is appropriate to provide clarity regarding the year modelling had been carried out and the supporting text has been amended.
P1C1/6	P1C1	Policy diagrams for Old Oak South Place are unsound. Policy diagrams should reflect both end-state aspirations and HS2's currently committed Act scheme.	1	HS2 Ltd.	Change proposed. OPDC has amended the figure to show a diagram depicting HS2's currently committed scheme within the High Speed Rail (London - West Midlands) Act 2017 scheme for 2026 to demonstrate how the area will change.
P1C1/7	P1C1	Public open spaces and station squares should promote natural green landscaping, trees etc. rather than swathes of hard surfacing. Tree lined routes can help promote legibility. Maintenance and management plans, materials for public realm	1	London Borough of Hammersmith and Fulham	Noted. The supporting text identifies that the Old Oak South Local Park will comprise a number of connected spaces ranging from hard landscaped station stations with civic functions to green pocket parks. Noted. Policy EU2 provides guidance for urban greening. Change proposed. Maintenance and management plans for open spaces and materials should be consulted with the relevant borough where appropriate. This requirement has been added to relevant policies.

		improvements must be agreed with the Boroughs.			
P1C1/8	P1C1	Old Oak Common Station needs to carefully design to provide ample cycle parking.	1	London Borough of Hammersmith and Fulham	Noted. OPDC will work closely with HS2 to ensure sufficient provision of cycle parking.
P1C1/9	P1C1	Development needs to take into account quality and appearance.	1	London Borough of Hammersmith and Fulham	Noted. Policies SP9, D2, D4, D5, London Plan policies and national guidance will be used to delivery high quality design of development.
P1C1/10	P1C1	The HS2 Station design (internal) and surrounds (external area) must address and support the growth in population; the regeneration ambitions of the Local Plan which will connect the station to surrounding stations.	1	London Borough of Hammersmith and Fulham	Noted. OPDC will work closely with HS2, DfT and TfL to ensure Old Oak Common Station supports the increase in population and is well connected to other stations. Policies SP7, P1, P1C1 and P2 provide this guidance in the Local Plan.
P1C1/11	P1C1	There are doubts that Old Oak Common Station will be built.	1	Friary Park Preservation Group	Noted. The enactment of the High Speed Rail (London - West Midlands) Act 2017 confirms that HS2 will be delivered. Site works are now underway.
P1C1/12	P1C1	Policy is sound	1	Diocese of London	Noted.
P1C1/13	P1C1	Policies requiring transport infrastructure, namely the HS2 station, to support planned growth in the OPDC area are unsound. The policies would require works to cater for additional station capacity outside of HS2's scope as set out in the Act. For the policies to be sound they should accurately reflect HS2's set scope for station capacity and be more flexible	1	HS2 Ltd.	No change proposed. The policy is considered to provide sufficient reference to the HS2 Act and flexibility to accommodate future capacity.

		on aspirations for future capacity.			

Place Policy P2: Old Oak North

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P2/1	P2	Should make use of West London Line viaduct space for town centre uses	1	West London Line Group	Noted. Old Oak North Development Framework Principles recommends the delivery of a viaduct and delivery of town centre uses around the potential Hythe Road Station. This is reflected in the policy.
P2/2	P2	Construction of an initial phase of Old Oak High Street truncated by the canal and Crossrail depot will not encourage early activation in Old Oak North.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Old Oak North Development Framework Principles demonstrates that connections from Scrubs Lane, Old Oak Common Lane via key routes will support early activation of Old Oak North.
P2/3	P2	Town centre uses at Grand Union Square and other major canal crossings should be restricted to facilitate the new Local Park.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers that retail, leisure and community uses have the potential to complement and support activiation of the proposed Grand Union Canal Local Park.
P2/4	P2	Policy should reference benefits of early delivery of new bridge link to Willesden Junction Station.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted. OPDC considers Policy P2 provides sufficient guidance for the delivery of new connections to Willesden Junction that reflects current phasing of development.
P2/5	P2	Careful consideration should be given to the environment created by the Old Oak Sidings Waste Site and impacts on residential	15	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis, Victoria Hollertz, TITRA, Wells House Road	No change proposed. The requirement for new or enhanced waste sites to minimise environmental impacts is covered in Policy EU6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		development. Policy should go further in supporting health and well being to mitigate the impact on existing waste management sites on residential areas.		Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P2/6	P2	Policy should acknowledge that EMR site could come forward earlier than currently envisaged.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Policy DI2 provides guidance that ensures all development proposals are brought forward as early as possible.
P2/7	P2	Policy should state that tall buildings may be appropriate near to the bridge leading to Willesden Junction Station.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. OPDC considers that Policy P2 provides sufficient guidance for the location of tall buildings in Old Oak North based on evidence base.
P2/8	P2	Smaller residential units do not need to be focussed around the small business hub.	1	Old Oak Park Limited	Change proposed. Policies relating to the location of smaller units have been removed from policy P2.
P2/9	P2	Reprovision of creative businesses (in terms of quantum, type or reprovision of businesses) is not appropriate. Rolls Royce Building should not be identified to have the opportunity to deliver space for meanwhile uses.	1	Old Oak Park Limited	No change proposed. Policy E2 provides guidance for the reprovision of existing businesses outside of SIL. The Rolls Royce Building is proposed to be Locally Listed and the envisaged retention in the short/medium would place this as an appropriate location for meanwhile uses.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P2/10	P2	Level of detail on meanwhile uses is inappropriate. Suggested that this is removed	1	Old Oak Park Limited	Change proposed. Detailed guidance for meanwhile uses has been removed to avoid repetition with Policy TCC9.
P2/11	P2	Northern viaduct solution for Hythe Road Station will make the sustainable drainage solution difficult to achieve	1	Old Oak Park Limited	No change proposed. OPDC considers Policy EU3 provides an appropriate framework to inform site specific interventions to deliver sustainable drainage infrastructure appropriate to the role of a Local Plan.
P2/12	P2	Greater clarity required about locally listed buildings in OON	1	Old Oak Park Limited	Noted. OPDC has consulted separately on its proposed local heritage listings.
P2/13	P2	Greater clarity required on whether development in OON should deliver or facilitate the walking/cycling bridge to Wormwood Scrubs	1	Old Oak Park Limited	No change proposed. Policy P2 provides information regarding retrospective pooling contributions
P2/14	P2	The level of detail provided in the policy is beyond what should be included in a Local Plan and would be more appropriately addressed through a masterplan planning application	1	Old Oak Park Limited	No change proposed. OPDC considers the level of detail provided is appropriate.
P2/15	P2	Support for delivery of 5000 new jobs and 2400 new homes in first 10 years	1	Fruition Properties	Noted.
P2/16	P2	The large waste sites need to be encouraged to move on at the earliest opportunity.	1	Victoria Hollertz	No change proposed. Old Oak Sidings waste site is required to meet Hammersmith and Fulham's waste appointment targets for the London Plan period. The site also has the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					potential to support the management of waste during the construction of Old Oak and contribute to a district heating/energy network. As such, the Old Oak Sidings waste site is safeguarded for the Local Plan period.
P2/17	P2	Support OON11 and OON12 and activation of Old Oak High Street.	1	Victoria Hollertz	Noted.
P2/18	P2	Support OON18 and target for new green space.	1	Victoria Hollertz	Noted.
P2/19	P2	Support OON24 and protecting heritage.	1	Victoria Hollertz	Noted.
P2/20	P2	There is concern that the policy commitment to the inclusion of energy from waste is premature given that no assessments of the requirements of such a proposal or the potential impacts has been carried out or included as part of the Local Plan consultation.	1	London Borough of Hammersmith and Fulham	No change proposed. The policy does not commit to delivering energy from waste. Any use would need to comply with OPDC's air quality policy and other material planning considerations. OPDC has undertaken a study looking at the air quality impacts from Energy from Waste at Old Oak Sidings and this supports the Local Plan.
P2/21	P2	There is no mention of OPDC's plans to relocate the EMR waste management site in Policy P2 and EU6. The safeguarded status of the Old Oak Sidings (Powerday) site should also be included.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy P2 safeguards Old Oak Sidings for waste management and apportionment purposes. The loss of EMR as a waste site would be managed through the policy requirements set out in EU6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P2/22	P2	OON.8, OON.12, OON.19 Areas inappropriate for housing would also be appropriate for artist space; artists' workspaces during the development stages could be very beneficial to the OPDC; Arts Centre Space offering workshops etc. could be included to feed into the community leisure, activity and social needs.	1	ArtWest	Noted. Employment floorspace referenced includes artist space. Policy TCC9 sets out guidance to support meanwhile uses.
P2/23	P2	Development should be encouraged to retain parts of the Rolls Royce Building and / or canalside warehouses for reuse by creative uses.	14	Hammersmith and Fulham Historic Buildings Group, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy D8 and P2 provide guidance for conserving and enhancing existing locally listed buildings including Rolls Royce Building and adjacent canalside engineering works. NPPF paragraph 126 provides guidance for the viable reuse of heritage assets.
P2/24	P2	Supportive of Cargiant reducing densities and proposing to retain the Rolls Royce building.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P2/25	P2	Without a commitment to the delivery of Hythe Road Station, the densities in Old Oak North are unjustified resulting in the policy being ineffective.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Development capacities and densities for Old Oak North are informed by a range of elements including existing and planned transport capacity. This includes improvements to existing stations and proposed new stations such as Old Oak Common Station and Hythe Road Station. The Public Transport Accessibility Levels generated by Old Oak Common Station, improvements to Willesden Junction Station and existing/planned bus routes supports the development capacity identified for Old Oak North without solely relying on improved public transport access generated by Hythe Road Station. The policy supports the delivery of the highest public transport levels to support density of development.
P2/26	P2	Support proposed Hythe Road Overground station, subject to it allowing for retention of artists' studios	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P2/27	P2	The housing targets or Old Oak North (Policy P2) appear more realistic and acceptable having been reduced by a third by the landowners from their original proposals. Welcome OPDC amending homes target to reflect Cargiant's figures but this has resulted in an increased target for Scrubs Lane.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Residential development capacity along Scrubs Lane has been identified using National Planning Practice Guidance Housing and Economic Land Availability Assessment guidance based on the Scrubs Lane Development Framework Principles capacity assessment.
P2/28	P2	Support the delivery of the viaduct option within Old Oak North.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P2/29	P2	Strongly support reprovision of creative business space	15	Old Oak Interim Neighbourhood Forum,	No change proposed. The employment policies support the reprovision of existing employment

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		but E1 will not ensure that this is re-provided at realistic rent levels for artists.		TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	floorspace, including creative business space. Supporting text to E2 sets out the approach to ensure reprovided floorspace is affordable. This would also include creative business space.
P2/30	P2	Figure 4.13: Elephant Park is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Elephant Park to be an appropriate precedent.
P2/31	P2	Figure 4.14: City Island is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers City Island to be an appropriate precedent.
P2/32	P2	Figure 4.15: Barking Town Centre is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Barking Town Centre to be an appropriate precedent.
P2/33	P2	Figure 4.16: Handyside Park, Kings Cross is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Handyside Park to be an appropriate precedent.
P2/34	P2	Figure 4.19: Granary Square, Kings Cross is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers Granary Square, Kings Cross to be an appropriate precedent.
P2/35	P2	Figure 4.20: The Grand Canal Square, Dublin is an inappropriate precedent	1	Regents Network	No change proposed. OPDC considers the Grand Canal Square to be an appropriate precedent.
P2/36	P2	It is appropriate that land in Old Oak North be developed	1	Mayor of London	Noted. This is supported through policies in the Local Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		to a high density. Tall buildings will be appropriate.			
P2/37	P2	Policy is overly prescriptive in identifying where there should be greater concentrations of family and smaller units. It should be dealt with through the masterplanning application	1	Old Oak Park Limited	Change proposed. Policies relating to the location of family sized units and smaller units have been removed from policy P2.
P2/38	P2	Support Policy P2l in broad terms	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

P2C1: Grand Union Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P2C1/1	P2C1	More detail required on types of facilities proposed for canal boaters.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers Policy P3 provides sufficient guidance to deliver new canal facilities.
P2C1/2	P2C1	Observe omission of Figure 36 from previous Draft Local Plan in revised draft.	1	The Inland Waterways Association-Middlesex Branch	Noted. Computer Generated Images are not included within the Revised Draft Local Plan.
P2C1/3	P2C1	Final station design proposals for proposed Hythe Road Overground station are still to be developed, and the station should be referred to as "potential".	1	Transport for London (Group Planning)	Change proposed. References to the Hythe Road Overground Station have been amended to refer to it as a potential station where appropriate.
P2C1/4	P2C1	P2C1 is too detailed and better suited for a planning brief informed by the Old Oak Masterplan and Old Oak Park Masterplan planning application.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. P2C1 has been removed to avoid duplication with policy P2.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P3/1	P3	Broadly support the proposed approach to the Grand Union Canal	1	Canal and River Trust	Noted.
P3/2	P3	Canal River Trust are incorrectly recognised as landowner of the Grand Union Canal, whereas they are in fact just a management organisation. Unless this is recognised, it has impact on the soundness of the Local Plan consultation.	1	Regents Network	No change proposed. OPDC has confirmed with the Canal and River Trust that for the purposes of the Local Plan, references to the organisation as a landowner is appropriate.
P3/3	P3	Historic attempts were made to deliver a northern towpath along the Grand Union Canal, and the land to allow for this may still be in public ownership.	2	Regents Network	Noted. This information will be used to inform future detailed proposals.
P3/4	P3	Concerns of the proposal for the southern towpath to deliver a 2-way cycle lane. Width of tow path should be increased.	24	Regents Network, Canal & River Trust, ArtWest, Nicky Guymer, Bruce Stephenson, Hammersmith Society, Oonagh Heron, Mark Walker, West Twyford Residents Association, Old Oak Interim Neighbourhood Forum, Dave Turner, Regents Network, TITRA, Midland Terrace	Change proposed. Policy P3 has been amended to reflect the character and transport roles of the towpath while recognising width restrictions to support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P3/5	P3	Intention to focus A3 and A4 uses onto the canalside adjacent the canal is supported, though negative impacts should be considered through detailed design.	1	Regents Network	Noted. Policy P3 provides guidance to ensure land uses support the activation of the canal and canalside spaces.
P3/6	P3	Concern that uniform building heights of 6-8 storeys along the canal will have a negative impact on amenity, and that amenity standards are not high enough.	2	Canal & River Trust, The Inland Waterways Association-Middlesex Branch	Change proposed. To recognise the need for building heights to respond to site specific circumstances, supporting text to P3 has been amended to highlight the need to provide appropriate enclosure along the canal. It should be noted that any proposal will need to accord with all other relevant planning policy and material considerations to provide appropriate levels of amenity and a high quality built environment.
P3/7	P3	Crossing points may not be best locations for taller	15	Canal & River Trust, Old Oak Interim	No change proposed. To respond to public transport access and support legibility where

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		buildings along the Canal. Tall buildings will obstruct views and vistas along the canal and use for wayfinding is questionable.		Neighbourhood Forum, The Inland Waterways Association-Middlesex Branch, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	major routes cross the canal, tall buildings are considered to be appropriate. Proposals for tall buildings at these locations will be considered on a case by case basis and will be determined using all other relevant planning policy and material considerations.
P3/8	P3	Policy should make clear that assessment of building heights will consider impact on heritage, character, biodiversity and amenity will be made at application stage. Retention of Birchwood Nature Reserve is supported.	4	Canal & River Trust, Sarah Abrahart, ArtWest, Regents Network	No change proposed. Assessment of buildings heights will be carried out in accordance with national guidance, London Plan policies and Local Plan policies (specifically policies SP8, SP9, D8, D5 and D6).
P3/9	P3	The CRT have no in principle planning objections to the proposed canal crossings. New crossings require the CRT's agreement, but role of secretary of state and highway authority should also be highlighted.	1	Canal & River Trust	Change proposed. OPDC considers highlighting the need for Canal and River Trust's and other stakeholder's agreement for crossings should be referenced within the supporting text to policy P3.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P3/10	P3	New bridges will need to be of high quality to ensure high quality public realm. Stronger wording should be provided	1	Canal & River Trust	No change proposed. Requirements for high quality design of buildings and the public realm are made in Policies D2 and D4.
P3/11	P3	The CRT are not convinced of the need for a bridge crossing within the Channel Gate area, but have no objection to its inclusion in the plan.	1	Canal & River Trust	Noted. Further detailed feasibility studies for a bridge in this location will be undertaken following the release of sites for development.
P3/12	P3	Opportunity may exist to re-use the Brunel Bridge from Paddington within the Old Oak development area.	1	Canal & River Trust	Noted.
P3/13	P3	Support for new permanent and temporary moorings. CRT suggest strengthening policy wording to provide stronger support. Detailed issues such as servicing and infrastructure when the CRT assess individual applications.	15	Canal & River Trust, Hammersmith Society, Regents Network, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the policy gives appropriate support to moorings.
P3/14	P3	Text should be added to Policy P3 to to protect the waterway from adverse impacts from new	1	Canal & River Trust	Change proposed. OPDC has amended the Local Plan to highlight the need to manage impacts of structural integrity on the canal.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		development, including structural integrity and land stability.			
P3/15	P3	CRT support the intention of a linear park along the Canal and feel consideration should be given at detailed design stage to how this will connect with other green spaces. Also welcome requirements for appropriate light levels given adverse impact on foraging bats.	14	Canal & River Trust, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P3/16	P3	Where appropriate, development contributions should be sought for improvements of the environmental quality of the canal.	1	Canal & River Trust	Change proposed. The supporting text has been amended to seek contributions.
P3/17	P3	Welcome support for waterborne freight transport but feel the Plan could be stronger in requiring developers to consider its use.	2	Canal & River Trust, Regents Network	No change proposed. Policy T7 requires development to maximise the use of more efficient and sustainable ways of delivering freight including by water.
P3/18	P3	Welcome designation of Grand Union Canal as a separate Place.	1	The Inland Waterways Association-Middlesex Branch	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P3/19	P3	Welcome vision for canal towpath.	1	The Inland Waterways Association-Middlesex Branch	Noted.
P3/20	P3	No locations for new water spaces have been identified. Unless such spaces are safeguarded it is unlikely they will be realised.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P3 provides guidance for the delivery of new basins and waterspaces. Specific locations have not been identified to enable a flexible approach to their delivery.
P3/21	P3	Precedent of Chicago Riverwalk is inappropriate for the Grand Union Canal.	2	The Inland Waterways Association-Middlesex Branch, Regents Network	No change proposed. OPDC considers Chicago Riverwalk to be an appropriate precedent.
P3/22	P3	Support approach to Grand Union Canal and proposal to implement a Conservation Area along its length.	15	London Borough of Ealing, Raymond Gill, Hammersmith and Fulham Historic Buildings Group, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P3/23	P3	Conflict between pedestrians and cyclists needs to be addressed along the towpath.	1	Bernie Timmins	Noted. To support the southern towpath's designation as part of the National Cycle Network and as a proposed TfL Quietway while reflecting width restrictions along its length,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					OPDC considers that OPDC's Public Realm, Walking and Cycling Strategy's recommendations to deliver a shared walking and cycling route is appropriate. This would be delivered in accordance with policy P3 and T2 which provides guidance to support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.
P3/24	P3	In Policy P3 Grand Union Canal subsection o) i) there is a typo “twith”.	1	Royal Borough of Kensington and Chelsea	Change proposed. Typo to be corrected.
P3/25	P3	Recommend that P3 is amended to reference the Water Framework Directive and the absolute requirement for changes not to result in deterioration of the waterbody and by including the improvement measures in the Infrastructure Delivery Plan.	1	Environment Agency	Change proposed. OPDC has made reference to the Water Framework Directive within the supporting text to Policy P3 and EU3.
P3/26	P3	Paragraph 165 of the NPPF promotes Planning Policies drawing on River Basin Management Plans and we feel that the Local Plan and relevant evidence base documents could be added to ensure that this is achieved.	1	Environment Agency	Change proposed. Policy EU3 has been amended to make reference to the Thames River Basement Management Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Seek to work with OPDC and the Canal and River Trust to understand what clean water discharge modifications may look like			
P3/27	P3	There is no information about funding developments on the Grand Union Canal.	1	Friary Park Preservation Group	No change proposed. Potential funding of infrastructure is set out in policy DI1. Funding of development will be provided by the relevant developer.
P3/28	P3	P3 should clarify future environmental controls for transporting waste via the canal.	20	Nicky Guymer, Bruce Stevenson, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, TITRA, Midland Terrace Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The supporting text has been amended to include new wording clarifying environmental controls for transporting waste via the canal.
P3/29	P3	The canal is an important space for green space, leisure, sport and creating an	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		attractive environment that preserves heritage.		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P3/30	P3	Support Canal and River Trust comments for regulation 18 Local Plan.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P3/31	P3	Support green corridor on north of the canal but this should go behind the warehouses.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy P3 sets the principle for delivering a new Local Park along the Grand Union Union Canal. Further detailed work will need to be undertaken to identify the specific location and boundaries of the park.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P3/32	P3	Support proposal for buildings to be 6-8 storeys (maximum) but do not agree with taller elements at node points.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. To respond to public transport access and support legibility where key routes cross the canal, tall buildings are considered to be appropriate. Proposals for tall buildings at these locations will be considered on a site by site basis and will be determined using all other relevant planning policy and material considerations.
P3/33	P3	Support the use of the canal for heating and cooling.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P3/34	P3	Oppose longer term moorings along the Grand Union Canal	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. OPDC considers that longer-term moorings alongside temporary and shorter term moorings will play a role in supporting the historic canalside character, meeting housing need and activating the canal.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P3/35	P3	Support potential for boating and canoeing on the Grand Union Canal	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P3/36	P3	Marinas should be encouraged to activate the canal.	1	West Twyford Residents Association	Noted. Policy P3 supports the delivery of new basins and waterspaces.
P3/37	P3	The Local Plan should recognise that a local water transport service is being set up on the doorstep of the OPDC area. This is being delivered by the Mayor's London Waterways Commission Freight Group, in association with UCL University College London, the Commercial Boat Operators Association and the Just Space Network	1	Regents Network	No change proposed. OPDC considers P3 provides appropriate supporting guidance for water transport services.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P3/38	P3	The Local Plan does not adequately deal with the Grand Union Canal with limited mention of it.	1	Regents Network	No change proposed. OPDC considers that the provision of guidance for the Grand Union Canal in the Spatial Vision, Strategic Policies, P3 and relevant development management policies provides a sufficient level of detail and consideration of the canal.
P3/39	P3	The Local Plan should not be as supportive of canal moorings for residential boats	1	Regents Network	No change proposed. OPDC considers that residential moorings alongside other types of moorings will play a role in supporting the historic canalside character, meeting housing need and activating the canal.
P3/40	P3	Canal moorings should not be seen as a way of meeting need for homes	1	Regents Network	No change proposed. OPDC considers that residential moorings contribute to meeting housing need.
P3/41	P3	Should have a policy supporting the provision of a narrowboat hire centre	1	Regents Network	No change proposed. OPDC considers that specifically requiring the delivery of a narrowboat hire centre goes beyond the role of a Local Plan. Policy P3 provides guidance for the delivery of supporting infrastructure for moorings.
P3/42	P3	References to a Cycle Quietway along the Grand Union Canal should be removed. The Public Realm, Walking and Cycling Strategy does not come up with a workable solution for the quietway.	1	Regents Network	No change proposed. To reflect emerging proposals, OPDC considers it appropriate to make reference to the proposed TfL Quietway. OPDC also considers that OPDC's Public Realm, Walking and Cycling Strategy's recommendations to deliver a shared walking and cycling route is appropriate. This would be delivered in accordance with policies P3 and T2 which provide guidance to support the delivery of a high quality, safe, accessible and inclusive

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					walking environment across Old Oak and Park Royal.
P3/43	P3	Support use of Here East as a precedent	1	Regents Network	Noted.
P3/44	P3	Proposed walking/cycling route along canal in front of Powerday site would preclude movement of waste by water and conflict with other policies SP7 and EU6.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P3 sets the principle for delivering a new walking and cycling route along the northern edge of the Grand Union Union Canal. Further detailed work will need to be undertaken to identify the location and extent of this route.
P3/45	P3	It is unclear how the trend to more public activities and public spaces along the canal will be managed and married with the character of the canal corridor.		London Borough of Hammersmith and Fulham	No change proposed. OPDC considers Policy P3 to provide an appropriate level of guidance for a Local Plan for the use and character of the canal. OPDC is developing a Waterspace Strategy and is designating a conservation area for the full length of the canal within the OPDC area which will provide further guidance for the use and character of the canal.

P4: Park Royal West

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P4/1	P4	The Local Plan should make reference to the extant planning permission on the Twyford tip site	1	Ashia Centur Limited	No change proposed. The supporting text to Policy P4 notes that the site has extant planning permission. However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use and therefore it is proposed to remain designated as part of the Strategic Industrial Location (SIL).
P4/2	P4	Policy does not identify potential open spaces along the canal within Park Royal. Should prioritise delivering at least 10m either side of canal as open space.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P4 already refers to improving green spaces along the canal and Policy P3 sets out detailed criteria for the entire length of the Grand Union Canal including opportunities for green infrastructure. As detailed in the Heritage Study, the character of the canal varies along its length, and from a heritage perspective, it is recommended that the diversity of different sections of the canal - as open or enclosed; vibrant or tranquil - is maintained as far as possible. Delivering 10m of open space either side would be inappropriate as it would not recognise this context. It could also undermine the protection of Park Royal SIL. The preparation of a new Conservation Area appraisal and associated guidance would provide a means to explore this in more detail.
P4/3	P4	Policy should be revised to better anticipate the evolution in London Plan policy on protecting industrial land supply and delivering the type of industrial development that is needed.	1	London Borough of Ealing	Change proposed. Policies E1 and E2 have been amended to reflect the updated position in the Economy section of the new Draft London Plan. New industrial site allocations have also been introduced to support industrial intensification in SIL, based on evidence in the Park Royal Intensification Study. Policies P4 and P5 now refer to these site allocations.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P4/4	P4	The policy lacks an appreciation of the existing spatial characteristics of the area, especially in patterns of use and size of premises.	1	London Borough of Ealing	No change proposed. The Place boundaries identified are based on the different spatial characteristics across the area.
P4/5	P4	Park Royal is a prime location for a demand responsive bus service incorporating the tube stations on the periphery	1	London Borough of Ealing	Noted. The Transport policies do not prohibit this type of bus service being delivered, but OPDC is not responsible for the delivery of this transport function and therefore cannot influence this through the Local Plan.
P4/6	P4	CAZ is leading location for London businesses. Should clarify that Park Royal is London's leading location for industrial business.	1	Mayor of London	Change proposed. The text has been amended to clarify Park Royal's status as an industrial location.
P4/7	P4	Any development proposal along the length of Western Avenue should be required to deliver improvements to green infrastructure and frontages	1	DP9 (on behalf of A40 Data Centre BV)	Noted. This is already covered in SP9, P4, D2 and EU2.
P4/8	P4	There is a need for local hubs, supported by better wayfinding across the estate.	1	Park Royal Business Group	No change proposed. The provision of small scale 'walk to' services for industrial occupiers is covered in TCC1 and wayfinding is covered by T2 and T3.
P4/9	P4	New clusters should be identified at the area surrounding Harlesden and Stonebridge Park stations, with a vision promoting a		John Cox	No change proposed. The objectives to deliver intensification, positive and/or active frontages, a more attractive public realm, reduced car parking and the provision of small walk to uses outside of Park Royal Centre are considered in Local Plan

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		range of uses assisting with a transition into Park Royal.			policies (SP9, P4, P5, TCC1 and T4) and these would apply across the Park Royal area. OPDC will be preparing a Park Royal Supplementary Planning Document and this would provide an opportunity to set out more detailed guidance to support the implementation of the Local Plan.
P4/10	P4	Suggestion that areas identified for intensification should be highlighted in the plan.	1	John Cox	Change proposed. New industrial site allocations have been identified based on work undertaken as part of the Park Royal Intensification Study.
P4/11	P4	Support approach to tall buildings	1	Deloitte (on behalf of Mapletree Pte)	Noted.
P4/12	P4	The site known as the Twyford Tip West should be removed from SIL and identified as a site allocation in line with proposals in implemented planning permission. Policy text should reflect the implemented planning permission and land uses at the former Twyford Tip site.	1	Turley (on behalf of Ashia Centur Limited)	No change proposed. The supporting text to Policy P4 notes that the site has extant planning permission. However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use and therefore it is proposed to remain designated as part of the Strategic Industrial Location (SIL).
P4/13	P4	Support improvements in Policy P4		Turley (on behalf of Ashia Centur Limited); Hammersmith Society	Noted.
P4/14	P4	Park Royal area is not suitable for the application of Green Space Factor.		Friary Park Preservation Group	No change proposed. It is considered that all major development in the OPDC area should seek to maximise opportunities to increase urban greening and biodiversity. Further detail on how

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the urban greening factor will be applied will be included in an Environmental Standards SPD.
P4/15	P4	Policy is sound		Friary Park Preservation Group	Noted.

P4C1 Brewery Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P4C1/1	P4C1	The Twyford Abbey Road site was identified as a development site in the Reg 18 Local Plan, but it has not been in the Reg 19 Local Plan and it should be. It should be identified for residential development	1	Diageo Plc	No change proposed. The site is a designated open space delivered as part of an earlier phase of development at First Central. The open space is of good quality and provides green space, recreation and play space. OPDC does not consider it appropriate to allocate this site for redevelopment through the Local Plan. It is part of a larger coherent public open space of over 2ha in size, constituting a 'local park' as defined in the Mayor's London Plan. Any loss of this open space would need to accord with the requirements of policy EU1,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					and provide equivalent or better open space in terms of its quantity, quality and function.
P4C1/2	P4C1	Lakeside Drive site is difficult to deliver and could instead be used to off-set lost recreational uses from the Twyford Abbey Road site	1	Diageo Plc	No change proposed. The Lakeside Drive site ranges in width from 19 metres to 22 metres and is considered to be of sufficient width to provide a range of development typologies and to be deliverable. OPDC does not consider it appropriate or necessary through the Local Plan to designate the site as an open space to offset the loss of public open space elsewhere. In accordance with Policy EU1, if a loss of open space was proposed through a planning application then any replacement open space must provide equivalent or better open space in terms of its quantity, quality and function.
P4C1/3	P4C1	P4C1 should be amended to give greater flexibility and allow the market to direct the preferred use of the Diageo site.		Deloitte (on behalf of Mapletree Pte)	Change proposed. Policy E2 has been amended to protect employment uses outside of SIL unless certain criteria are met. The merits of each proposal would be assessed on a case by case basis. Policy P4C1 and the associated supporting text already provide flexibility in terms of the broad mix of uses that might be appropriate within this area.
P4C1/4	P4C1	Supports Figure 4.26 showing site as residential but location of active/positive frontages is too prescriptive.		Deloitte (on behalf of Mapletree Pte)	No change proposed. Policy P4C1 allows for changes over time by including a range of locations for active frontages and Policies SP9 and D2 seeks to maximise the use of active/positive frontages. These policies are considered to provide sufficient flexibility to accommodate change but also provide a

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					necessary amount of detail to ensure the delivery of high quality development.

Place Policy P5: Old Park Royal

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P5/1	P5	Proposals to designate a new Conservation Area conflict with aims of SIL which seek to support industrial development. Some of the poor quality built fabric would benefit from being redeveloped.		London Borough of Ealing	No change proposed. OPDC's Heritage Study identified a group value to the cluster of heritage buildings and due to the relationship between these buildings and the street/spaces which is consistent with its original layout. The group value demonstrates that the area has special historic and architectural interest and as such it is considered appropriate to be proposed as a new conservation area. The boundary of the Conservation Area will be subject to a separate consultation exercise and the purpose of the conservation area is not to restrict development but to conserve and enhance the special qualities of the area, which should in turn support high quality and appropriate design. P5 also refers to the need to retain the urban grain and street pattern as this is a key feature of the area's historic makeup.
P5/2	P5	May not be possible to rationalise, minimise or remove on street parking. Park Royal	13	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents	No change proposed. Policy P5 recognises this by requiring these enhancements 'where possible and practicable'.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		has always relied on vehicle movement and is a hostile environment for pedestrians.		Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P5/3	P5	Old Park Royal should be de-designated from SIL to allow for a wider range of uses to mediate transition between Old Oak and Park Royal	13	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Industrial Land Review and its Addendum set out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, the area's London-wide role, the loss of industrial land across London and the ongoing demand for industrial space.
P5/4	P5	Scope for intensification in Old Park Royal is limited	13	Old Oak Neighbourhood Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Park Royal Intensification Study explores opportunities as well as deliverable and commercially viable strategies to intensify industrial land. This Study demonstrates that there are sites where it is possible to increase the amount of floorspace and jobs in Park Royal. The Local Plan identifies new industrial site allocations based on this work.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P5/5	P5	Policy on more generous pavements is desirable but unachievable.	13	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy P5 recognises the challenges of increasing pavement widths in Old Park Royal by noting that it will be supported 'where this does not have a significant adverse impact on the functioning of the highway'.
P5/6	P5	Support the designation of the proposed St Leonards Road Conservation Area.	13	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The boundary of the proposed Conservation Area will be subject to a separate consultation exercise.

Place Policy P6: Park Royal Centre

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P6/1	P6	Sites at Acton Lane, in Park Royal Centre, should be identified for supported housing units given their proximity to the Hospital and their unsuitability for conventional residential development.	1	London Borough of Brent	Change proposed. Supporting text has been amended to reflect that planning permission has been granted for supported housing along Acton Lane. The Housing policies set out more detailed policies on supported housing.
P6/2	P6	Support place vision including increased shops and services, improved public realm, junction enhancements.	1	Montagu Evans (on behalf of T.A.S.B. Investments Ltd)	Noted.
P6/3	P6	Support Park Royal neighbourhood centre and support for a mix of uses such as the Hospital, new shared business focussed services, and other complementary uses	1	Montagu Evans (on behalf of T.A.S.B. Investments Ltd);	Noted.
P6/4	P6	Support recognition of the importance of Central Middlesex Hospital	1	Montagu Evans (on behalf of T.A.S.B. Investments Ltd);	Noted.
P6/5	P6	Site specific circumstances should be considered when assessing public and movement criteria in Policy P6.	1	Montagu Evans (on behalf of T.A.S.B. Investments Ltd)	No change proposed. Planning applications will be assessed on their individual merits against the policy objectives.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P6/6	P6	Support provisions to ensure local character is informed by the area's existing heritage.	1	Montagu Evans (on behalf of T.A.S.B. Investments Ltd)	Noted.
P6/7	P6	Should consider a linear centre with uses which animate and civilise the main route, and form part of a coherent spatial strategy for Park Royal	1	London Borough of Ealing	Change proposed. The Park Royal neighbourhood centre and the main routes forming the Big X have been considered as part of Park Royal Centre Development Framework Principles document. The Park Royal place policies take into account recommendations from this work and will ensure that development improves the appearance and experience of the public realm, as well as encouraging people to walk and cycle to/from Park Royal. A Park Royal SPD will be prepared to provide more guidance on implementing the place policies.
P6/8	P6	Mixed industrial-residential development should be supported in Park Royal Centre.	1	London Borough of Ealing	No change proposed. Policy P6 and supporting text already support a mix of uses as long they mitigate the impacts on the Strategic Industrial Location (SIL) and accord with other policies in the Plan.
P6/9	P6	Support idea of heart of Park Royal as a vibrant hub with retail, leisure, health and entertainment facilities. This would also be a suitable location for flexible, affordable office space suitable for start-ups and SMEs and spaces suitable	1	Park Royal Business Group	Noted. Policy E3 already supports workspaces for small businesses and start-ups.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		for business meetings and networking.			
P6/10	P6	Land within the Central Middlesex Hospital complex is not publicly accessible. Land to the rear of the site, which is owned by the NHS, may be suitable for open space	1	London North West Healthcare NHS Trust	Noted. The Park Royal Development Framework Principles document has considered the appropriate mix and location of land uses, including opportunities for open space. All relevant figures in the Local Plan have been updated accordingly.
P6/11	P6	Support policy to protect and enhance existing social infrastructure, including facilities at Central Middlesex Hospital	13	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. This is covered by policy TCC4.

P6C1: Asda Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P6C1/1	P6C1	Greater emphasis could be given to the role of Central Middlesex Hospital as a major employer and catalyst for the regeneration in OPDC	1	NHS London Healthy Urban Development Unit	Change proposed. Additional supporting text to P6 has been added to reflect the importance of Central Middlesex hospital.
P6C1/2	P6C1	Support Policy	1	London North West Healthcare NHS Trust	Noted.

Place Policy P7: North Acton and Acton Wells

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P7/1	P7	Imperial supports policies for both student accommodation and new homes in this place, especially affordable, for both students and staff. Imperial also recognises the role well designed tall buildings can play in this and other areas.	1	Imperial College	Noted.
P7/2	P7	General support for policy P7	4	Osbourne Investments Limited and Quattro Holdings Limited, Citrus Group and Fuller Smith & Turner, London Borough of Ealing, Friary Park Preservation Group	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P7/3	P7	Land take for Old Oak High Street should be minimised so that the developability of adjacent sites is not compromised.	1	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. Land required to deliver Old Oak High Street will be defined based on identified need to support transport modes and delivery of Healthy Street aspirations and a high quality place.
P7/4	P7	Policy should be more specific on location for tall buildings, and should identify the Boden House site as suitable for tall buildings.	1	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. Policy SP9 had been amended to accord with requirements of London Plan policy D8 to define locations of tall buildings. The figure supporting this policy defines Boden House as a location appropriate for tall building in principle.
P7/5	P7	The Boden House site has the potential to deliver significantly higher housing numbers than identified in the site allocations table.	1	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. OPDC considers the capacity identified for the site is appropriate and accords with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. The methodology for identifying this capacity is set out in OPDC's Development Capacity Study which is based on indicative capacities provided by the Victoria Road and Old Oak Lane Development Framework Principles development capacity assessment. The homes capacity figures are minimum figures and additional capacity may be appropriate subject to proposals according with national guidance, London Plan Policies and Local Plan Policies.
P7/6	P7	The Elizabeth Line rail spur has not been proved feasible or financially viable, and is not	1	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. Proposals to deliver a link between the Elizabeth Line and West Coast Main Line have been withdrawn following the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		safeguarded by appropriate bodies. Safeguarding of the line has major impacts on the developability of the site, and clarify is required on its feasibility.			decision to explore the delivery of the West London Orbital Line. As these two elements are mutually exclusive, references to safeguarding land to facilitate delivery of the spur have been removed from the Local Plan. To reflect emerging transport proposals text has been provided to safeguard land for West London Orbital Route Line in Acton Wells.
P7/7	P7	The safeguarding of the Quattro Site for waste management purposes following release by HS2 is not compatible with the vision for the Place and Old Oak High Street. Policy should refer to the possibility of the waste site being relocated.	1	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. The current version of the West London Waste Plan safeguards the site. This is Development Plan policy. However, OPDC will be working with the West London Waste Authorities to update the West London Waste Plan to align with the draft London Plan waste apportionment figures and the continued designated of this site for waste apportionment purposes will be reviewed as part of this.
P7/8	P7	The policy and the text in the table (page 101) should be amended to be consistent with representations on Policy P7C2 and Policy P8.	1	Castlepride Limited	Noted. Refer to OPDC's responses to these issues.
P7/9	P7	Greater detail should be provided on the potential Elizabeth Line-WCML spur to aid understanding.	1	Transport for London (Group Planning)	Change proposed. Proposals to deliver a link between the Elizabeth Line and West Coast Main Line have been withdrawn following the decision to explore the delivery of the Chiltern Line. As these two elements are mutually exclusive, references to safeguarding land to facilitate delivery of the spur have been

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					removed from the Local Plan. To reflect emerging transport proposals text has been provided to safeguard land for the Chiltern Line in Acton Wells.
P7/10	P7	Strongly object to proposed local listing of The Castle. The Castle pub has not previously been identified worthy of local listing and nothing has occurred recently to suggest it should be. Change to surrounding areas does not affect the historic significance of The Castle Pub. The building is unremarkable and there are many other examples of buildings typical of this era.	1	Citrus Group and Fuller Smith & Turner	No change proposed. OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that The Castle Pub exhibited sufficient local heritage significance to warrant its proposed designated as a non-designated heritage asset on OPDC's forthcoming Local List. This is based on the recognition that it has historic, townscape, architectural and social significance. It is one of the few character buildings remaining in the area. The corner turret is a local landmark that contributes to the building providing a positive juxtaposition to the surrounding built form. OPDC consulted on the Local List in early 2018.
P7/11	P7	Change in the area from one of industry and rail and road networks should not be cited as a reason for retaining buildings with little or no historic value which could undermine delivery of development	1	Citrus Group and Fuller Smith & Turner	No change proposed. OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that The Castle Pub exhibited sufficient local heritage significance to warrant its proposed designation as a non-designated heritage asset on OPDC's Local List. This is based on

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the recognition that it has historic, townscape, architectural and social significance. It is one of the few character buildings remaining in the area. The corner turret is a local landmark that contributes to the building providing a positive juxtaposition to the surrounding built form.
P7/12	P7	Support for a mixed use town centre.	1	London Borough of Ealing	Noted.
P7/13	P7	It is necessary to be explicit that the routes connecting North Acton and Old Oak need to be direct and legible and ensure North Acton is integrated with Core Old Oak Common area.	1	London Borough of Ealing	Noted. Policies SP7, T1 and T2 also provide guidance to ensure routes are high quality.
P7/14	P7	Support the policy of ensuring a balanced approach to student housing.	1	London Borough of Ealing	Noted.
P7/15	P7	Proposals for public realm are welcomed.	1	London Borough of Ealing	Noted.
P7/16	P7	Policy should set clear objectives for the upgrade of North Acton Station.	1	London Borough of Ealing	No change proposed. OPDC considers the guidance set out in P7C1 to be sufficiently detailed for the role of a Local Plan to support future upgrades to North Acton Station
P7/17	P7	Publicly accessible open space policies need to provide clearer guidance for the roles of open spaces to deliver playing fields.	1	Sport England	Change proposed. Policies SP8 and EU1 provide guidance for delivering multifunctional open spaces. Policy EU1 has been amended to include the need for playing fields as part of open space provision. Policy P7 provides

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					place specific guidance for open spaces appropriate to the role of a Local Plan.
P7/18	P7	The promotion of tall and high density development on the Victoria Industrial Estate, and reference to a minimum rather than target/maximum number of homes is supported.	1	SEGRO	Noted.
P7/19	P7	These comments have not been published due to inappropriate content.	1	Ron Thorp	N/A
P7/20	P7	Dull and dismal in the extreme.	1	Ron Thorp	Noted. Policy P7 provides place specific guidance to deliver a high quality built environment.
P7/21	P7	Towers in North Acton should be knocked down and replaced with buildings of lower heights.	1	Ron Thorp	No change proposed. North Acton has already been established as a place for tall buildings and this approach will continue to be supported reflecting existing and future improved public transport access. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations.
P7/22	P7	Recently developed housing units are too small.	1	Ron Thorp	Noted. Policy H3 requires all self-contained housing to meet London Plan and national housing space standards.
P7/23	P7	Para NA.14 regarding improving air quality should be	6	Joanna Betts, Francis, Marc and Caroline Sauzier, Lily Gray, Wells	No change proposed. Policy P7 provides guidance for improving air quality based on OPDC's Air Quality Study.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		strengthened, and the text should be included in policy.		House Road Residents Association, Catherine Sookha, Thomas Dyton	
P7/24	P7	Site for secondary school should be allocated/safeguarded within North Acton even if it is not required until after the plan period.	1	Diocese of London	No change proposed. Policy P7 requires development to contribute to the delivery of infrastructure requirements as set out in the OPDC's Infrastructure Delivery Plan.
P7/25	P7	Development in North Acton has been of poor quality.	15	Hammersmith Society, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Ron Thorp	Noted. London Plan policies and Local Plan policies SP8, D1, D4, D5 and P7 provide guidance to deliver a high quality built environment.
P7/26	P7	Additional student housing in North Acton is not supported as there is already an overconcentration.	15	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents Association, Wells House Road Residents Association, Joanna Betts, Nadia	Noted. Policy P7 seeks to deliver appropriate levels of student accommodation in accordance with Policy H10. Policy H10 sets out guidance to ensure student accommodation contributes positively to an area by requiring proposals to contribute to the vibrancy and diversity of an area, by

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	locating development in areas of high PTAL, to not undermining the delivery of conventual self-contained housing supply and to not result in an overconcentration in any one specific location.
P7/27	P7	It is important that the connection between Acton Wells and Old Oak South and the Old Oak Common Lane Station are designed well	15	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies SP7, P1, T1 and T2 also provide guidance to ensure routes are high quality.
P7/28	P7	The Plan should not identify P7 as a strategic policy, allowing a neighbourhood plan's policies to take precedence.	15	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P7/29	P7	Policy does not discourage a mono-type of housing (student housing) being delivered in North Acton	1	Harlesden Lets	Noted. Policy P7 seeks to deliver appropriate levels of student accommodation in accordance with Policy H10, which requires schemes to not result on an overconcentration of student accommodation in one location.
P7/30	P7	Figure 4.33 Use of Kings Cross as a precedent as it is not well planned or generous in terms of open space provision.	1	Regents Network	No change proposed. OPDC considers Kings Cross to be an appropriate precedent which provides a range of high quality publicly accessible open spaces.
P7/31	P7	Figure 4.34 Information supporting the precedent is nondescript and a better photo is needed.	1	Regents Network	No change proposed. OPDC considers the description of figure 4.34 to be appropriately detailed and of a sufficient quality.
P7/32	P7	North Acton tall buildings do not relate to surrounding context. Additional residents	13	Grand Union Alliance, Wells House Road Residents Association,	No change proposed. North Acton has already been established as a place for tall buildings and this approach will continue to be

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		will have an impact on social infrastructure		Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	supported reflecting existing and future improved public transport access. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations. Requirements for developers to contribute to social infrastructure are set out in Policy TCC4.

P7C1: North Acton Town Centre Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P7C1/1	P7C1	Policy should emphasise the importance of station improvements at North Acton in providing and the role it should play in the areas enhancement.	1	Transport for London (Group Planning)	No change proposed. OPDC considers Policy P7C1 provides significant emphasis for delivering improvements to North Acton Station.
P7C1/2	P7C1	North Acton Station Square should be referred to as "potential", not existing.	1	Transport for London (Group Planning)	No change proposed. North Acton Station Square is due to be completed in 2018. As such OPDC does not consider it appropriate to refer to the open space as potential.
P7C1/3	P7C1	General support for policy P7C1	1	Friary Park Preservation Group	Noted.

P7C2: Old Oak Common Lane Station Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P7C2/1	P7C2	The Plan should require the provision of an underground tunnel linking Old Oak Common station and the Old Oak Common Lane Overground station. This could be used for removal of spoil and then as a pedestrian connection between the two stations	1	West London Line Group	No change proposed. Policy P7C2 requires proposals to continue Old Oak High Street, integrate with the station and with the station square to the west of the station. The exact nature of this connection could be over or under the London Overground Lines. It should be noted that TfL have explored both an underpass and overbridge option and recently consulted on their preferred option as an overbridge.
P7C2/2	P7C2	Midland Gate site can help deliver the Old Oak High Street Link	1	Castlepride Limited	Noted.
P7C2/3	P7C2	Final station design proposals for proposed Old Oak Common Lane Overground station are still to be developed, and the station should be referred to as "potential".	1	Transport for London (Group Planning)	Change proposed. The word 'potential' has been inserted into the text.
P7C2/4	P7C2	The supporting text (OCL.5) should not be too prescriptive and should recognise that development at Midland Gate could proceed in advance of Old Oak Common Lane Station.	1	Castlepride Limited	Change proposed. This wording has been removed.
P7C2/5	P7C2	Text needed to reflect that works on surface links between Old Oak Common	1	Transport for London (Group Planning)	Change proposed. Has been amended to reflect that works on surface links between Old Oak Common Station and the potential

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Station and the potential Overground station is subject to ongoing work. Welcome reference seeking to ensure feasibility of route between Old Oak South and Acton Wells.			Overground station is subject to ongoing work.
P7C2/6	P7C2	Lack of government funding a concern.	1	Friary Park Preservation Group	Noted. Policy DI1 sets out the proposed approach to secure funding, including public sector funding.
P7C2/7	P7C2	Object to TfL proposals for a cycle/pedestrian bridge crossing, rather than a tunnel, at Old Oak Common Lane Station.	19	Nicky Guymer, Bruce Stevenson, Mark Walker, Dave Turner, Midland Terrace Residents, TITRA, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is continuing to work with TfL to reflect outputs of the ongoing studies and consultation processes for the design and delivery of Old Oak Common Lane Station and associated connection between Acton Wells and Old Oak South.
P7C2/8	P7C2	Support proposed Old Oak Common Lane Overground Station	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P7C2/9	P7C2	Midland Terrace, Shaftesbury Gardens and Wells House Road are within the Old Oak Neighbourhood Area. Over-detailed policies will conflict with NPPF guidance on avoiding 'duplication' and also risks including policies that are inappropriate for a Local Plan which would not normally be revised within 5 years. P7 and P7C2 should not be strategic policies.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.

Place Policy P8: Old Oak Lane & Old Oak Common Lane

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/1	P8	Should require HS2 to provide acoustic glazing and air conditioning for all houses on Wells House Road	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. HS2's mitigation and compensation arrangements are governed through HS2 Ltd's own arrangements and are not a matter for the Local Plan.
P8/2	P8	Retaining wall next to Wells House Road should be rebuilt as a green wall	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The exact nature of the reprovision of any wall is too detailed an issue for the Local Plan, but could be something covered through a Neighbourhood Plan.
P8/3	P8	The plan should note that Wells House Road will be at the centre of HS2 and other construction activities for the next 20-30 years	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. The Local Plan references the need to mitigate construction impacts in this Place. Other residential communities will also be at the centre of construction activities in this Place. It is not considered necessary to identify that a particular road will be adversely affected.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
P8/4	P8	Development opportunity at Midland Gate should be recognised in the policy text.	1	Castlepride Limited	Change proposed. The supporting text has been amended to reflect development potential of Midland Gate.
P8/5	P8	Policy should be amended to not preclude potential for tall buildings on the Midland Gate site.	1	Castlepride Limited	Noted. OPDC has developed the Tall Buildings Statement to accord with Draft New London Plan policy D8. This sets out the process for how locations where tall buildings will be appropriate in principle. Midland Gate is not currently identified as an appropriate location. The Statement recognises that these locations may change and will inform future updates to the Local Plan.
P8/6	P8	Correct reference is Willesden Junction Bus Garage. Support retention of SIL designation and bus garage use for Willesden Junction Bus Garage.	1	Transport for London (Group Planning)	Change proposed. Wording in the Local Plan refers to Willesden Junction Bus Garage
P8/7	P8	Old Oak Lane/Victoria Road is currently the only road link between east and west parts of OPDC.	1	London Borough of Ealing	Noted.
P8/8	P8	Island Triangle area should not be surrounded by high rise development.	1	Bernie Timmins	Noted. Policy P8 identifies that generally lower heights directly adjacent to the Island Triangle are appropriate. This policy will be implemented alongside national guidance, London Plan policies and Local Plan policies SP9, D4, D5 and D6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/9	P8	More attention should be paid to preservation of the railway cottages, and planning should not be granted for extensions or other proposals which damage the built character of the buildings.	1	Bernie Timmins	Noted. Policy P8 provides guidance to ensure the Old Oak Lane Conservation Area is conserved and enhanced. OPDC is also working with The Island Triangle Residents Associated to refresh the guidance for the Old Oak Lane Conservation Area in due course.
P8/10	P8	There is a need for new green spaces around the Island Triangle to act as a buffer between the HS2 works and residential buildings.	1	Bernie Timmins	Noted. Policy P8 seeks to enhance and expand the Old Oak Community Gardens adjacent to The Island Triangle and seeks to deliver linear spaces along Old Oak Lane.
P8/11	P8	Implementation of the Oaklands scheme and its contribution to the delivery of P8's vision should be referenced in supporting text paragraph OOL.3.	1	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	No change proposed. Following completion of the Oaklands development it will be depicted as an existing residential neighbourhood.
P8/12	P8	Former Railway Institute building, Goodhall industrial units and adjacent Network Rail land can be a gateway into Old Oak delivering mixed use development. This would require demolition of locally listed FRI building and existing industrial buildings	1	Raban Goodhall Ltd	Change proposed. Following development of further evidence base, the Goodhall industrial units have been removed from SIL. This will facilitate mixed use development.
P8/13	P8	General support for policy P8	3	Raban Goodhall Ltd, Victoria Hollertz, Friary Park Preservation Group	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/14	P8	P8 should made reference to its proximity future transport investment at Willesden Junction.	1	Raban Goodhall Ltd	No change proposed. Policy P8 vision makes reference to the place connecting Willesden Junction Station with Wormwood Scrubs and East Acton.
P8/15	P8	FRI building still requires improvement but costs of further improvements are expensive and affect viability of developing the site. Retention of the FRI building is more likely if adjacent sites are developed for mixed use.	1	Raban Goodhall Ltd	Noted. The Former Railway Institute building is located within the Old Oak Lane Conservation Area. As such it is part of a designated heritage asset. Proposals to develop designated assets are required to accord with NPPF paragraph 133 which requires local planning authorities to refuse total loss or substantial harm of designated heritage assets unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or viable reuse cannot be achieved. The building is also proposed for inclusion on OPDC's Local List.
P8/16	P8	Improvements to Old Oak Lane, should be particularly focused on improving public realm for walking and cycling and slowing/deprioritising vehicle movements such as a green buffer/large planters, wider pavements, cycle lane).	1	Victoria Hollertz	Noted. Policy P8 seeks to deliver a high quality public realm with improved walking and cycling infrastructure.
P8/17	P8	The route into the Channel Gate area should be via Atlas Road and a bridge over the canal. Channel Gate Road	21	Victoria Hollertz, Nicky Guymer, Bruce Stevenson, Mark Walker, Old Oak Interim Neighbourhood	Noted. OPDC will work with HS2 and TfL to explore the potential to redirect construction traffic to help minimise impacts on to the Island Triangle residential neighbourhood.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		currently carves historic Goodhall Street in two. Old street pattern should be restored.		Forum, Dave Turner, TITRA, Midland Terrace Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P8/18	P8	Strongly support deliver of new and expanded green open spaces Old Oak Lane and Old Oak Common Lane	1	Victoria Hollertz	Noted.
P8/19	P8	Support improving air quality but policy needs to be stronger. Increasing the amount of waste Powerday can manage would be disastrous for residents and their health. Regulation has failed to address issues with local air quality, dust and odour.	1	Victoria Hollertz	Noted. Policy EU4 and table 6.1 provide policy for minimising air pollution and making a positive contribution to overall improvement in air quality. Policy EU5 provides policy for mitigating impacts of noise and vibration.
P8/20	P8	Strongly support this policy of lower building height near Old	1	Victoria Hollertz	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Oak Lane/Island Triangle and/or green buffer			
P8/21	P8	The promotion of building heights and high density development on the Westway Estate, and reference to a minimum rather than target/maximum number of homes is supported.	1	SEGRO	Noted.
P8/22	P8	Policy is unsound	1	Sarah Abrahart	No change proposed. OPDC considers the policy is sound.
P8/23	P8	Support having a separate place for Old Oak Lane and Old Oak Common Lane.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P8/24	P8	Support the recognition that there needs to be sensitive integration between existing and new development.	15	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P8/25	P8	A buffer zone is needed between the existing residential areas and new development in Old Oak South	16	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Lori Wiechec, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The policy identifies that generally lower heights directly adjacent to existing residential areas are appropriate. This policy will be implemented alongside national guidance, London Plan policies and Local Plan policies SP9, D4, D5 and D6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/26	P8	Support the identification of Atlas Junction Neighbourhood town centre	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P8/27	P8	Should remove the restriction of town centre uses to sites only within the town centre. This approach is overly rigid.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The definition of a town centre hierarchy and provision of policies to deliver a sequential approach for the location of town centre uses accords with NPPF paragraph 24. This supports a town centre first approach. Taking an alternative approach would not be consistent with the NPPF or in general conformity with the London Plan.
P8/28	P8	P8c) for the Harlesden Bus Depot should not be considered strategic so that a neighbourhood plan can set the appropriate land uses for the site	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P8/29	P8	Designation of SIL has not been applied consistently. Explanation for releasing the Westway Estate from SIL but retaining Old Park Royal as SIL is required.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The release of SIL designation with the wider Old Oak area, including the Westway Estate is set out in London Plan Opportunity Area guidance, the Old Oak and Park Royal Opportunity Area Planning Framework and the Industrial Land Review supporting study. This reflects the development opportunities presented by Old Oak Common Station. This opportunity is reflected in OPDC's Industrial Lane Review which sets out an evidence based approach for the release of SIL.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/30	P8	If plans to widen Victoria Road are carried out, mitigating action should be taken to replace lost trees and vegetation.	1	Douglas Hunt	Noted. Policy P8 seeks to mitigate the impacts of HS2 and construction within the design of public realm. Policy EU1 and EU2 also seek to manage the loss of street planting and open spaces.
P8/31	P8	The costs and complexities of the Victoria and Westway estates means that viability will be more important on these sites than perhaps other sites in the area which have already been obtained for the purpose of redevelopment for an alternative use.	1	SEGRO	Noted.
P8/32	P8	A key challenge in the delivery of Victoria and Westway site allocations is the ability to provide new industrial space within the OPDC area, so that existing businesses at the estates can be decanted into new premises.	1	SEGRO	Noted. OPDC will work closely with land owners and tenants to retain or reprovide employment floorspace in new development.
P8/33	P8	Harlesden Bus Depot should be dedesignated as SIL due to: Isolation from wider Park Royal Considered to be part of Harlesden	1	Harlesden Neighbourhood Forum	No change proposed. The Harlesden Bus Depot is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 to continue to provide strategic functions as a bus depot and rail freight site. This will help to deliver the following benefits:

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Adjacent to residential areas Adajcent to Harlesden Town Centre Shop units fronting onto Station Road within SIL Derelict building in west of depot Enviromental impact on surrounding areas Site needs to support movement to/from Old Oak along Station Road. Dedesignation of Harlesden Bus Depot from SIL would allow for site to be redeveloped in the long term if the bus depot could be satisfactorily relocated nearby. OPDC should allocate land elsewhere for the bus depot.			Secures sustainable transport services to serve existing and planned growth; Robust service provision supported accessibility provided by close proximity to Willesden Junction Station; Employment of over 300 people with training facilities. OPDC has met with Harlesden Neighbourhood Forum during the development of the Revised Draft Local Plan to respond to concerns regarding adjacency to residential uses, environmental impacts and provide a high quality frontage to Station Road. Policy P8 has been updated to address these concerns while continuing to retain the SIL designation. Revelant policy components include: - requiring active and positive frontages on to the public realm - ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8/34	P8	Policy E1 would prevent delivery of shops or cafes on to Station Road. Positive frontages won't contribute to supporting movement to Old Oak.	1	Harlesden Neighbourhood Forum	No change proposed. Supporting text to policy P8 clarifies the form of town centre uses appropriate to delivery active frontages which will ensure consistency with E1 and conformity with London Plan SIL policies.
P8/35	P8	Recognise loss of SIL across west London is an issue and that the Mayor will be restricting this. Suggest dedesignation is a balancing act between uses and priorities. There should not be a blanket refusal to refuse dedesignation. Loss of 1.2 hectares of SIL would not significantly impact industrial land supply.	1	Harlesden Neighbourhood Forum	No change proposed. The Harlesden Bus Depot is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 to continue to provide strategic functions as a bus depot and rail freight site. This will help to deliver the following benefits: Secures sustainable transport services to serve existing and planned growth; Robust service provision supported accessibility provided by close proximity to Willesden Junction Station; Employment of over 300 people with training facilities. OPDC has met with Harlesden Neighbourhood Forum during the development of the Revised Draft Local Plan to respond to concerns regarding adjacency to residential uses, environmental impacts and provide a high quality frontage to Station Road. Policy P8 has been updated to address these concerns while continuing to retain the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					SIL designation. Revelant policy components include: - requiring active and positive frontages on to the public realm - ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.
P8/36	P8	The Mayor supports the SIL designation and retention of the Willesden Junction bus garage.	1	Mayor of London	Noted.
P8/37	P8	Sites at Goodhall Street should also be taken out of SIL to enable the comprehensive redevelopment of the area	1	Boyer Planning	Change proposed. The Industrial Land Review and Addendums have undertaken a review of additional sites within SIL to assess to determine whether additional changes to the SIL boundary are appropriate. The Goodhall Street sites are proposed to be released from SIL for mixed use development.
P8/38	P8	High Street connection across Old Oak Common Lane would have massive impact on neighbouring communities and	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. The Local Plan promotes an east-west connection between North Acton, the proposed Old Oak Common Lane station and the HS2 station. The Local Plan does not specify whether this would be a

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		tunnelled option would be a preference.		Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	bridge or tunnel connection but any proposal would need to accord with planning policy, being well designed and appropriately responding to the surrounding context.

P8C1: Atlas Junction Town Centre Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P8C1/1	P8C1	Support paragraph AJ.7	1	Victoria Hollertz	Noted.
P8C1/2	P8C1	General support for policy P8C1	1	Friary Park Preservation Group	Noted.
P8C1/3	P8C1	Policy P8C1 it too detailed to be a strategic policy within a Local Plan in light of NPPF para 185 as this location falls within the Old Oak Neighbourhood Area and will have guidance provided within a future neighbourhood plan. Policy P8C1 should be removed from the Local Plan.	14	Old Oak Interim Neighbourhood Forum, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P8C1/4	P8C1	The Old Oak Neighbourhood Forum will be working with the new occupants of the Collective building, the Oaklands development (construction starting 2018) and the Harlesden Neighbourhood Forum on plans for an area in which existing and new residential and commercial buildings need to be integrated sensitively.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC will support the development of any neighbourhood planning guidance for the area in accordance with national guidance and Policy DI3.

Place Policy P9: Channel Gate

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P9/1	P9	Principal consideration in developing Channel Gate	1	London Borough of Ealing	No change proposed. Policy P9 vision and policy seek to respond to and mitigate impacts

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		should protecting amenity of current residents and maximising potential.			on adjacent residents. Policy D6 also provides guidance to provide an appropriate standard of amenity.
P9/2	P9	Channel Gate can act as an exemplar for SIL intensification and in making a successful transition between industrial zones and the core of Old Oak.	1	London Borough of Ealing	Noted. Policy P9 vision reflects this aspiration.
P9/3	P9	Policy acknowledges key responsibility to conservation area at Old Oak Lane.	1	London Borough of Ealing	Noted.
P9/4	P9	Policies to preserve and enhance Plantagenet House are unsound as HS2 Ltd was granted powers demolish this building as part of the HS2 Act.	1	HS2 Ltd.	Change proposed. OPDC's Heritage Strategy identifies Plantagenet House to have heritage significance that warrants its proposed designation as a locally listed heritage asset. Establishment of the Local List was subject to public consultation in 2018. OPDC is aware of the powers resulting from the HS2 Act and continue to consider that Policy P9 and D8 are consistent with NPPF paragraph 135 regarding non-designated heritage assets. However, OPDC has amended the supporting text to policy P9 to provide further information for how conserving and enhancing Plantagent house could be implemented to reflect powers of the HS2 Act.
P9/5	P9	Policy should explicitly state that the area will be subject to a	1	London Borough of Ealing	No change proposed. OPDC will consider whether additional supplementary planning guidance is suitable for Channel Gate in due

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		specific planning framework when released by HS2.			course. OPDC's Local Development Scheme will reflect this work.
P9/6	P9	Island Triangle should be improved and public open space should be provided. Railway cottages should be enhanced to add character to the area.	1	Tim Potter	Noted. Policy P8 provides guidance to enhance the Island Triangle.
P9/7	P9	Strongly support policy to activate area for meanwhile uses	1	Victoria Hollertz	Noted.
P9/8	P9	There should be improved noise and air quality mitigation and screening to reduce impact from retained strategic freight use.	1	Victoria Hollertz	Noted. Policies D6, P9 and P8 provide guidance to this effect.
P9/9	P9	Designation of parts of Channel Gate place as SIL is inflexible and conflicts with other policies.	20	Nicky Guymer, Bruce Stevenson, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, Midland Terrace Residents, TITRA, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. Channel Gate is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 and to continue to provide strategic functions as a rail freight site. This is reflected in OPDC's Industrial Land Review which sets out an evidence based approach for the release and retention of SIL.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P9/10	P9	The eastern part of Channel Gate forms part of the designated Old Oak Neighbourhood Area. Over-detailed policies will conflict with NPPF guidance on avoiding 'duplication' and also risks including policies that are inappropriate for a Local Plan which would not normally be revised within 5 years.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P9/11	P9	P9 is not justified as it lacks guidance for building heights.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. Guidance for building heights is provided in Policy P9. This reflects the evidence base for buildings heights set out in the Grand Union Canal Heights and Massing Note and the Park Royal Intensification

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Strategy. It also reflects the development timescales for Channel Gate. HS2 currently safeguards the area for construction activities until 2026. In preparation for the release of safeguarding, OPDC may consider the need for additional evidence base and building heights guidance.
P9/12	P9	Support for the creation of a permeable street network in Channel Gate	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P9/13	P9	Question if waste sites on Channel Gate have been properly regulated.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. Any waste management facilities will need to accord with policy EU6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
P9/14	P9	Support designation of part of Channel Gate place within the Old Oak Neighbourhood Area.	13	TITRA, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

Place Policy P10: Scrubs Lane

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10/1	P10	An extra 350m of active frontage at Harrow Road/Scrubs Lane could result in over 5,000sqm of town centre floorspace, which could impact significantly on Harlesden Town Centre	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed - the requirement for a Harlesden Enhancement Strategy has been amended so that it applies to all places. It is now covered in Policy TCC1.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10/2	P10	OPDC should use the Old Oak Masterplan process to deliver a suitable contextual response; a consideration of potential less damaging alternatives; measures to minimise or mitigate potential harm, and; shape a coherent building heights strategy along Scrubs Lane.	1	Historic England	Noted. OPDC considers that the Scrubs Lane Development Framework Principles provides appropriate guidance, including a coherent building heights strategy, that is informed by the local context and considers the impact on the significance of heritage assets within and around the OPDC area.
P10/3	P10	It isn't clear if suggested cycle and pedestrian routes along Scrubs Lane are existing or proposed. If proposed, then such improvements would be difficult to deliver without encroaching on the Scrubs which is highly objectionable. Current entrance points to Wormwood Scrubs from Scrubs Lane are appropriate and no additional access points are required.	15	The Friends of Wormwood Scrubs, Hammersmith Society, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC has amended the policy to provide flexibility in its implementation.
P10/4	P10	Further recognition is required for flexibility in planning policy when seeking to bring forward early development including when seeking to deliver housing above the ground floor.	1	Remavon	No change proposed. OPDC considers Policy P10 and other Local Plan policies to be sufficiently flexible to support early development.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10/5	P10	Flexibility is required for policies seeking sites to deliver new/improved pedestrian and cycle routes so that they do not unduly impact on the development potential of specific sites.	1	Boropex Holdings Limited	No change proposed. The location and form of walking and cycling routes set out in P10 is justified by the Scrubs Lane Development Framework Principles and informed by transport supporting studies. OPDC considers that the level of detail provided within P10 is appropriate to the role of a Local Plan to guide development proposals.
P10/6	P10	Support P10(g)	1	Boropex Holdings Limited	Noted.
P10/7	P10	Support P10(i)	1	Boropex Holdings Limited	Noted.
P10/8	P10	Policy restricting one tall building in each cluster on Scrubs Lane is too restrictive, does not accord with London Plan policy 7.7 and has already been contravened by recently permitted schemes.	1	Boropex Holdings Limited	No change proposed. The approach to tall buildings along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. This approach accords with London Plan policy 7.7(A) by ensuring the guidance for tall buildings is part of a plan-led approach to developing Scrubs Lane by identifying appropriate, sensitive and inappropriate locations for tall buildings. Currently permitted schemes accord with the guidance set out in P10.
P10/9	P10	Figure 4.49 is overly prescriptive, in particular the requirements illustrated for public open space and public access routes. It should be revised to show a reduced	1	Boropex Holdings Limited	No change proposed. The London Plan Appendix states that all figures in the Local Plan should be treated as indicative. The introduction to the Places Chapter confirms that place policy figures are diagrams. Figure 4.49 and the indicative amount of publicly accessible

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		amount of public open space, and a statement should be inserted clarifying that the diagram is indicative only.			open space is based on recommendations set out in the Scrubs Lane Development Framework Principles. As such OPDC considers the indicative amount of publicly accessible open space depicted in figure 4.49 is appropriately justified and appropriate for the role of a Local Plan.
P10/10	P10	Policy should be reworded so as not to specifically mention / show the public space at junction of 115-129 Scrubs Lane and remove green arrow through this space.	1	Boropex Holdings Limited	Change proposed. To provide clarity regarding the role of the space between 115-129 Scrubs Lane and Mitre Wharf, the diagram supporting Policy P10C4 will be amended to remove the public open space in this location. No change proposed. The locations of the green arrows depicting pedestrian/cycling routes are based on recommendations set out in the Scrubs Lane Development Framework Principles to support connectivity to the publicly accessible open space.
P10/11	P10	It may not be appropriate for the easterly block on Mitre Wharf site to include active uses.	1	Boropex Holdings Limited	Change proposed. To reflect the quieter character of this area, positive frontages have been shown in figure supporting Policy P10C4.
P10/12	P10	The identification for a 3.5m route for walking and cycling either side of the canal within the Grand Union Canal Massing and Enclosure Note is overly generous for the Mitre Wharf site, and should be	1	Boropex Holdings Limited	No change proposed. The Grand Union Canal Massing and Enclosure Note sets out indicative cross sections, assuming 3.5 metres on either side of the Grand Union Canal across its length. This is used to inform appropriate height to width ratio to define general heights for development facing on to the canal. It does not

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		integrated with open space provision.			set out guidance requiring 3.5 metre wide walking/cycling along the northern edge of the canal. Guidance for delivering this route is provided in Policy P3 which does not define an envisaged width.
P10/13	P10	Support P10C4(d)(e)	1	Boropex Holdings Limited	Noted.
P10/14	P10	As currently worded, policy suggests views through the mitre wharf site to/from the Cemetery and Mitre Bridge should be protected. While the setting of these assets should be respected, the connecting view does not merit a need respected and policies suggesting that they should should be deleted. Evidence has been provided setting out rationale for removing parts (e)(ii) and (iii).	1	Boropex Holdings Limited	Change proposed. To ensure correct referencing, Policy P10C4 has been amended to make reference to Scrubs Lane overbridge. Change proposed. Policy P10C4 has been amended to remove references to views between heritage assets.
P10/15	P10	Support intention to provide improved cycle facilities and bus corridor reliability.	1	Transport for London (Group Planning)	Noted.
P10/16	P10	Policy wording should be clearer regarding delivering development after the plan period and that any proposals for future development of the North Pole Depot will need to	1	Transport for London (Group Planning)	No change proposed. Policy SP9 sets out phasing of development reflecting the North Pole East Depot being delivered after the plan period.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		take account of future operational needs.			
P10/17	P10	Support vision for early delivery at Scrubs Lane.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
P10/18	P10	Support for 1,100 new jobs and a minimum of 2,000 new homes during the plan period including early development	1	Fruition Properties	Noted.
P10/19	P10	Support for small business employment uses fronting Scrubs Lane	1	Fruition Properties	Noted.
P10/20	P10	Retail uses could also be appropriate along the length of Scrubs Lane	1	Fruition Properties	No change proposed. To support the vitality of Scrubs Lane, delivery of employment floorspace and ensure retail units benefit from sufficient footfall, retail uses are focused within clusters at new and improved east-west routes.
P10/21	P10	Support residential uses on upper floors of Scrubs Lane	1	Fruition Properties	Noted.
P10/22	P10	There should be flexibility on building heights	1	Fruition Properties	No change proposed. The approach to building heights along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations.
P10/23	P10	Part (f) and paragraph SL.6 should make reference to Kensal Canalside Opportunity Area.	1	Royal Borough of Kensington and Chelsea	Change proposed. Amendments have been made to the policy.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10/24	P10	Evidence base for tall buildings along Scrubs Lane is not sufficient should give more consideration to the impact of tall buildings along Scrubs Lane on the St Mary's and Kensal Green Cemeteries.	16	Royal Borough of Kensington and Chelsea, Old Oak Interim Neighbourhood Forum, Historic England, Hammersmith and Fulham Historic Buildings Group, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The approach to building heights along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. A Strategic Views Assessment on the impact on relevant heritage assets was carried out to inform the Framework Principles recommendations. This approach accords with London Plan policy 7.7(A) and Draft New London Plan policy D8 in defining locations of tall buildings.
P10/25	P10	Scrubs Lane is currently unpleasent and has poor amenity.	1	A Somefun	Noted. Policy P10 provides place specific policies to address these issues.
P10/26	P10	Policy is unsound	1	Sarah Abrahart	No change proposed. OPDC considers the policy is sound.
P10/27	P10	More buses are needed along Scrubs Lane	1	ArtWest	Noted. Policy T6 requires proposals to facilitate, deliver and contribute to bus infrastructure.
P10/28	P10	Support policy.	1	ArtWest	Noted.
P10/29	P10	Guidance for a tall building in each clusters needs further detail.	1	ArtWest	No change proposed. The approach to building heights along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					movement routes, public transport access and sensitive locations. A Strategic Views Assessment on the impact on relevant heritage assets was carried out to inform the Framework Principles recommendations. This approach accords with London Plan policy 7.7(A) and Draft New London Plan policy D8 in defining locations of tall buildings.
P10/30	P10	Plan to develop south of the Grand Union Canal on the Mitre Industrial Estate is illogical and is not positively prepared or justified.	14	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Proposals for redevelopment of the Mitre Industrial Estate is based on evidence base set out in the Scrubs Lane Development Framework Principles. Development capacity information for these sites was subsequently used to inform the Development Capacity Study in accordance with National Planning Practice Guidance for Housing and Economic Land Availability Assessments. This considers the improvements in public transport provided by Old Oak Common Station, Scrubs Lane bus services and proximity to the development of Kensal Canalside, including the potential Elizabeth Line Station. Development capacity also considers the adjacent sensitive locations of Little Wormwood Scrubs, Wormwood Scrubs and residential areas.
P10/31	P10	Without a commitment about the delivery of the Hythe Road station, the densities in Scrubs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. Should Hythe Road Station not be delivered, high density development would be appropriate based on public transport accessiblity improvements

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Lane are unjustified and ineffective		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	offered by Old Oak Common Station, improvements to Willesden Junction Station and bus services along Scrubs Lane. Relevant policies support enhancements to public transport accessibility levels.
P10/32	P10	Support designation of Cumberland Park Factory Conservation Area	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P10/33	P10	Planning permissions along Scrubs Lane have been permitted based on the emerging policy of the Scrubs Lane Development Framework Principles Document and emerging Regulation 19 Local Plan. Draft Regulation 18 Local Plan policies have been disregarded. Objections to permissions refer to these decisions being premature.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Permissions have been determined following a plan led approach considering relevant national guidance, London Plan policies, Local Plan policies and other material considerations on a case by case basis.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Permissions do not deliver the Regulation 18 vision to deliver a sensitive edge and "a pleasant street, respectful of surrounding heritage assets, with a high quality public realm".			
P10/34	P10	Sub paragraphs of P10 are too detailed for a Local Plan. This reflect land ownerships of developers and does not provide a plan-led approach. Clusters are not justified due to lack of evidence of their locations being more active or distinctive thatn other locations.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10/35	P10	LBHF as Highways Authority has submitted strong objections to the series of planning applications for developments in Scrubs Lane, on the grounds that these are premature until a comprehensive new road layout is delivered.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Permissions along Scrubs Lane accord with Policy P10 by providing sufficent space to enable the future delivery of high quality cycle lanes and a generous footpath. This is recommended by the Scrubs Lane Development Framework Principles document. Detailed design schemes for the cycle land and footpath will be undertaken at the appropriate time reflecting delivery of development along Scrubs Lane.
P10/36	P10	Policy P10f)ii) is not considered to be deliverable and is too detailed for a Local Plan and should be removed and left for a SPD, Area Action Plan or neighbourhood plan	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P10/37	P10	Policy for the clusters is too detailed and would be more appropriate in a site planning brief or neighbourhood plan.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P10/38	P10	Object to the proposal for a separate segregated cycleway	1	Regents Network	No change proposed. A continuous segregated cycle lane along the full length of Scrubs Lane

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		over the Grand Union Canal and consider that the proposal for it is not clear in the Local Plan			is required to support local permeability. Additional guidance will be provided withing the future Old Oak Norht and Scrubs Lane Supplementary Planning Document in due course.
P10/39	P10	Support for Pillbox precedent but it is not very descriptive	1	Regents Network	Noted.
P10/40	P10	All parks and green spaces in Kings Cross are linear as there is little space that is 'open'.	1	Regents Network	Noted.
P10/41	P10	Local Plan should allow flexibility for taller buildings outside of cluster locations, in particular gateway locations such as 151 Scrubs Lane.	1	Remavon	No change proposed. The approach to tall buildings along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. Building heights will also be informed by national guidance, London Plan policies and Local Plan policies including SP9 and D5. This accords with the requirements of Draft New London Plan policy D8 to define locations of tall buildings.

P10C1: Harrow Lane Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10C1/1	P10C1	Support principle of tall building on corner of Scrubs Lane/ Harrow Road	1	Fruition Properties	Noted.
P10C1/2	P10C1	The Harrow Road cluster can deliver a range of uses	1	Fruition Properties	No change proposed. OPDC considers the range of land uses proposed for the Harrow Cluster in Policy P10C1 to be appropriate and reflect its location, existing land uses and potential development capacity.
P10C1/3	P10C1	Retaining the Chandelier building would restrict the development potential of the cluster from a construction logistics perspective. Retention would also restrict delivery of 2-way cycle lane along Scrubs Lane. Floorspace could be reprovided within the cluster	1	Fruition Properties	No change proposed. OPDC considers the retention of the Chandelier Building supports the delivery of the P10 vision for Scrubs Lane, continuing the employment heritage of Scrubs Lane and supporting the local economy. This approach is supported by the Scrubs Lane Development Framework Principles which demonstrates the delivery of new cycle lanes are achieveable with the retention of the Chandelier building. The Chandelier Building is also a Building of Local Heritage Interest, identifying it as a non-designated heritage asset and benefiting from policy D8 to secure its conservation and enhancement.
P10C1/4	P10C1	Incorrect reference to complete listing as asset of community value	1	Fruition Properties	Change proposed. Reference to the correct Asset of Community Value listing has been made in P10C1.
P10C1/5	P10C1	Community and employment aspect of this policy is crucial. Development should be	1	David Craine	Noted. London Plan policies and Local Plan policies P10, SP9, D4 and D5 provide guidance to ensure development responds to

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		sensitive to existing residential development.			existing residential areas as sensitive locations.
P10C1/6	P10C1	Harrow Road Cluster could make greater contribution to jobs and homes targets	1	Fruition Properties	No change proposed. OPDC considers the capacity identified for the site is appropriate and accords with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. The methodology for identifying this capacity is set out in OPDC's Development Capacity Study which is based on indicative capacities provided by the Scrubs Lane Development Framework Principles development capacity assessment. Additional capacity may be appropriate subject to proposals according with national guidance, London Plan Policies and Local Plan Policies.

P10C2: Laundry Lane Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10C2/1	P10C2	Green bridge linking Old Oak Gardens and Laundry Lane is not supported. Wording should be changed to a 'bridge'.	1	Old Oak Park Limited	Change proposed. To reflect recommendations of the Old Oak North Development Framework Principles the policy has been amended to support an all modes route to Old Oak North.
P10C2/2	P10C2	Policy is sound	2	A Somefun, David Craine	Noted.

P10C3: Hythe Road Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10C3/1	P10C3	Policy is sound	2	A Somefun, David Craine	Noted.

P10C4: Mitre Canalside Cluster

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P10C4/1	P10C4	The Planning Statement in the Mitre Yard planning application did not consider the air quality of the location of the development	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The comment relates to a planning application's planning statement rather than to the Local Plan.
P10C4/2	P10C4	Improved connectivity wouldn't be achieved by delivering a route through the Mitre Wharf site as no through route exists east of the site, and no plans are in place for such a route.	1	Boropex Holdings Limited	No change proposed. Policy P10C4 does not seek to deliver a through route through Mitre Wharf to the east. References to improving connectivity seek to deliver improved and new connections to the site.
P10C4/3	P10C4	Support vision for P10C4, but the vision and P10C4(a) should include explicit reference to residential uses.	1	Boropex Holdings Limited	Change proposed. The vision for the Mitre Canalside Cluster and policy P10C4 have been amended to refer to residential uses.
P10C4/4	P10C4	Location is too sensitive with regard to impact on surrounding	1	Royal Borough of Kensington and Chelsea	No change proposed. The approach to building heights along Scrubs Lane is supported by the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		heritage assets for a tall building and high density on the eastern side of Scrubs Lane and along the canal. Tall buildings are not the only way to mark important locations/junctions and to support wayfinding. In this case, Mitre Bridge would be the important and characteristic landmark and to help wayfinding.			Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. An assessment on the impact on relevant heritage assets was carried out to inform the Framework Principles recommendations. OPDC considers that building heights are one of the potential ways to support legibility appropriate to the role and scale of Old Oak.
P10C4/5	P10C4	Policy is sound	1	A Somefun	Noted.
P10C4/6	P10C4	Support the focus on leisure, eating and drinking and communal activity close to the canal.	1	David Craine	Noted.
P10C4/7	P10C4	Mary Seacole Gardens should be enlarged and enhanced.	1	Regents Network	Noted. Policy P10C4 seeks to increase the size, quality and accessibility of Mary Seacole Gardens.

Place Policy P11: Willesden Junction

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P11/1	P11	The proposed links from Willesden Junction Station in	2	London Borough of Brent, Local resident	No Change proposed. There are two links to Willesden Junction station proposed to route

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		the diagram for P11 will not assist in improving connection between Old Oak and Harlesden, and does not reflect Brent's ambition that the Station presents strong frontage to station road.			north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
P11/2	P11	Policies for Willesden Junction Station are broadly consistent with TfL's aspirations.	1	Transport for London (Group Planning)	Noted.
P11/3	P11	Any proposals for future development of Willesden Maintenance Depot will need to take account of future operational needs. Any dedesignation would be subject to standard rail industry procedures and consultation.	1	Transport for London (Group Planning)	Noted. No change proposed. OPDC will continue to discuss with TfL on this point.
P11/4	P11	It should be assumed that bus interchange and standing facilities should be retained, though longer term solution may be found meaning bus standing is not required.	1	Transport for London (Group Planning)	Noted. OPDC has retained the bus interchange and standing facilities at Willesden Junction station. OPDC will support future work investigating longer term solutions.
P11/5	P11	Station improvements and delivery of new bridge link should be early priorities.	1	HGH Planning	Noted. OPDC will the support the earliest delivery feasible for these transport improvements.
P11/6	P11	Should include public realm improvements for pedestrians walking between Willesden	1	Victoria Hollertz	No change proposed. The figure for the Willesden Junction place policy (P11) identifies improvements to the bridge. This is

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Junction via Station Approach over bridge to Old Oak Lane			supported by the Victoria Road/ Old Oak Lane supporting study. This is included in OPDC's Infrastructure Delivery Plan.
P11/7	P11	Support the development and timely delivery of Willesden Junction.	2	London Borough of Hammersmith and Fulham, David Craine	Noted.
P11/8	P11	Policy is sound (no justification provided)	1	Friary Park Preservation Group	Noted.
P11/9	P11	Lack of clarity about improvements to Willesden Junction station	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No Change proposed. Three improvement options were developed and are outlined in the Wilesden Junction station supporting study. Further work is underway to investigate this further.
P11/10	P11	Support the views of the Harlesden Neighbourhood Forum on the Willesden Junction place	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
P11/11	P11	The proposed links from Willesden Junction Station in the diagram for P11 will not assist in improving connection between Old Oak and Harlesden, and does not reflect Brent's ambition that the Station presents strong frontage to station road.	1	London Borough of Brent, Harlesden Neighbourhood Forum	No change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
P11/12	P11	Any proposals for future development of Willesden Maintenance Depot will need to take account of future operational needs.	1	Transport for London (Group Planning)	Change proposed. OPDC will add to the supporting text to make clear the the proposals for future development of Willesden Maintenance Depot will need to take account of future operational needs. The depot is not shown as being deliverable within the plan period any longer.
P11/13	P11	Station improvements and delivery of new bridge link should be early priorities.	1	HGH Planning	Noted. No change proposed
P11/14	P11	should include public realm improvements for pedestrians walking to Old Oak Lane	1	Not logged	No change proposed. This is indicated within Policy P8 and P11
P11/15	P11	Support the development and timely delivery of Willesden Junction.	1	London Borough of Hammersmith and Fulham	Noted.
P11/16	P11	At Willesden Junction, the proposed new High Street should connect to the west via	1	Not logged	No Change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Station Road, rather than to the east to Harrow Road.			plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
P11/17	P11	Directing the High Street to connect to Station Road rather than Harrow Road would bring greater benefits to Harlesden Town Centre and in providing appropriate commercial uses along the High Street link.	1	Not logged	No Change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
P11/18	P11	Policy is sound (no justification provided)	1	Friary Park Preservation Group	Noted.
P11/19	P11	Strongly support improvement to Willesden Junction.	1	David Craine	Noted.
P11/20	P11	Support the views of the Harlesden Neighbourhood Forum on the Willesden Junction place	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P11/21	P11	Primary concern is that Harlesden will not be integrated with the development of Old Oak. The Local Plan does not go far enough in promoting improved links.	1	Harlesden Neighbourhood Forum	No change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local Plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
P11/22	P11	The RLNS identifies the need to manage impacts of Old Oak on Harlesden Town Centre. The Harlesden Neighbourhood Plan has focused on improvements to Station Road and to regenerating the core of the town centre.	1	Harlesden Neighbourhood Forum	Noted. The improvements to Station Road are indicated within the place policy.
P11/23	P11	The Local Plan should revert to the principal link through to Station Road shown in the regulation 18 Local Plan with active frontages adjacent to it.	1	Harlesden Neighbourhood Forum	No change proposed. The figure associated with the Willesden Junction place policy (P11) shows Station Approach as a key route.
P11/24	P11	Discrepancy between Fig 3.8, which shows the High Street connecting westwards to Station Road and Figure 4.50	1	Harlesden Neighbourhood Forum	Change proposed. The figure has been amended. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P11/25	P11	Policy should be that the High Street is proposed to be diverted west in front of the station to join with Station Road and this should be shown in the diagram.	1	Harlesden Neighbourhood Forum	No change proposed. Station Approach is identified as a key route in the diagram. The high street is an alternative link serving the west desire line.
P11/26	P11	Development principles for wider area of Willesden Junction should not be driven by station design. Access to Harlesden Town Centre will be key. Overstation development at the western end with active frontages and the provision of a new entrance facing onto Station Road would bring benefits to Harlesden and its community.	1	Harlesden Neighbourhood Forum	Noted. No change proposed. The Willesden Junction area is identified as a site for development. Development will have to take acount of the technical requirements for this station. Access to Harlesden Town centre is key. Overstation development is supported in the policy.

Place Policy P12: Wormwood Scrubs

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P12/1	P12	There has been a weakening of the theme of retaining the Scrubs as a	13	The Friends of Wormwood Scrubs, Wells House Road	Change proposed. The supporting text has been amended to make

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		space that is more wild than tamed. Suggested text edit to the V1 to include stress "more wild than tamed" theme.		Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	reference to the need for the Scrubs to remain more wild than tamed.
P12/2	P12	The role of the Wormwood Scrubs Trust in the management of the Scrubs requires greater emphasis, and their role in permitting any future enhancement works on the Scrubs reiterated.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that Policy P12 and the supporting text provides clear and appropriate information setting out the role of the Wormwood Scrubs Charitable Trust and the need for any proposals to be agreed with the Trust and the London Borough of Hammersmith and Fulham.
P12/13	P12	Nature of what is considered appropriate ancillary facilities should be clarified, and note should be taken of the proposed café.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. To provide additional clarity regarding potential essential ancillary facilities, the supporting text has been amended to suggest potential uses.
P12/14	P12	Strongly support policies protecting Scrubs as MOL, and can't envision	14	The Friends of Wormwood Scrubs, Wormwood Scrubs	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		any special circumstances which would merit harm or any loss.		Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
P12/15	P12	New walking and cycling routes should not be introduced across the Scrubs.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.
P12/16	P12	Character of the Scrubs should be retained in the face of increased access, greater numbers of users	15	The Friends of Wormwood Scrubs, Scott Cawley, Hammersmith Society, Wormwood Scrubs	Noted. Policies P12 and EU1 provide guidance to continue to protect Wormwood Scrubs as Metropolitan Open Land and to conserve and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		resulting from 3 new access points, light pollution and building heights		Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	enhance the Scrubs in its role as a Metropolitan Park.
P12/17	P12	Communities on different sides of the Scrubs should not be connected by new routes through the Scrubs.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities are not able to easily make use of the open space. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with Policy P12, requiring proposals to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.
P12/18	P12	No direct link form the Station itself to the Scrubs is required. The proposed Green Bridge is supported and is the only link that is needed for anyone from the north wishing to access the Scrubs.	15	The Friends of Wormwood Scrubs, Hammersmith Society, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					accordance with Policy EU1 on the protection of Metropolitan Open Land.
P12/19	P12	An underpass connecting the station the Scrubs is not suitable. The Local Plan is unclear if such a connection is envisaged during the lifetime of the IEP depot.	14	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy P1 sets out that development should contribute to and/or enable the delivery of new and improved walking and cycling routes to Wormwood Scrubs, including within the surrounds of Old Oak Common Station. Policy P1C1 also seeks to deliver walking and cycling routes from the station to Wormwood Scrubs Street. The Local Plan does not set out the form of these routes from, or adjacent to, the station. Further work will be required in the design of Old Oak Common Station considering the long-term relocation of the Intercity Express Programme Depot to inform the form of connection from the station to Wormwood Scrubs. This work will inform future versions of the Local Plan. Change proposed. Further work will be required in the design of Old Oak Common Station considering the long-term relocation of the Intercity Express Programme Depot to inform the form of connection from the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					station to Wormwood Scrubs. This work will inform future versions of the Local Plan. To reflect this, OPDC has amended the supporting text.
P12/20	P12	Policy should clearly state that the embankment along the northern edge of the Scrubs should be retained.	14	The Friends of Wormwood Scrubs, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy SP8 and EU2 seek to deliver a net gain in biodiversity including measurably conserving and enhancing Sites of Importance for Nature Conservation (SINC). Wormwood Scrubs and the embankment benefit for a number of SINC designations . This guidance is referred to in Policy P12. In light of this guidance to conserve and enhance biodiversity assets, the roles of Wormwood Scrubs as Metropolitan Open Land and a Metropolitan Park, OPDC considers that Policy P12 provides appropriate guidance to ensure Wormwood Scrubs continues to be cherished public open space.
P12/21	P12	Oppose narrative that vegetation restricts walking and cycling access. Vegetation and woodland should not be lost to allow unneeded additional access.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					enhanced access points will be implemented in accordance with Policy P12 to agree any proposals with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1(a) in the protection of Metropolitan Open Land.
P12/22	P12	No new entrances from Old Oak Common Lane are required. Cycle routes from Old Oak Common Lane are not supported.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by poor quality walking and cycling routes from Old Oak Common Lane. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit. As such, existing communities in the north and west are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.
P12/23	P12	Location of proposed cycle route along Wormwood Scrubs Street is not clear - if located within Scrubs then it should be opposed.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	The Local Plan appendix confirms that all figures in the Local Plan should be treated as indicative reflecting the role of the Local Plan. Place policy figures are identified as diagrams in the introduction to the places chapter. OPDC considers that this level of detail within the figures

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	are appropriate to the role of the Local Plan. A future Old Oak North and Scrubs Lane Supplementary Planning Document (SPD) will be developed in due course. This will provide further proposed detailed guidance for the location and design of the cycle and pedestrian route along the west of Scrubs Lane. A draft of the Scrubs Lane SPD will be subject to public consultation provide opportunities to comment on and shape these detailed proposals.
P12/24	P12	Additional text required to clarify legal protection of the Scrubs.	13	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. To provide clarity regarding the roles of stakeholders, OPDC has amended the supporting text.
P12/25	P12	Figure 4.52 does not accurately reflect the area that currently has playing pitches. Sport England would object to any loss of these playing pitches.	1	Sport England	Change proposed. Figure 4.52 has been amended to reflect the existing provision of playing fields.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P12/26	P12	Support improving access to Wormwood Scrubs.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
P12/27	P12	It is appropriate that access to Wormwood Scrubs is improved and increased and that it provides a wide range of appropriate uses and functions.	1	Mayor of London	Noted.
P12/28	P12	Support for P12 vision	2	Victoria Hollertz, ArtWest	Noted.
P12/29	P12	Support the retention of Wormwood Scrubs as Metropolitan Open Land and the role of the Scrubs as a District and Metropolitan park for all.	1	London Borough of Hammersmith and Fulham	Noted.
P12/30	P12	The lack of detail about monitoring to ensure continued biodiversity makes this policy unsound	1	Friary Park Preservation Group	No change proposed. Policy EU2 provides guidance to ensure the measurable conservation and enhancement of Sites of Importance for Nature Conservation and other identified priority habitats or species.
P12/31	P12	There should be no enhancements and new access of any sort to Wormwood Scrubs.	1	Sarah Abrahart	No change proposed. The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan.
P12/32	P12	New access points to Wormwood Scrubs and facilities need to be	1	Hammersmith and Fulham Historic Buildings Group	Noted. Policies SP8, EU2, P12 and P1 provide guidance to ensure new

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		sensitive to areas of greatest biodiversity value.			access points and facilities conserve and enhance biodiversity assets.
P12/33	P12	P12 policy vision should recognise that the Scrubs is a Metropolitan Open Space	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy P12 vision identifies Wormwood Scrubs as Metropolitan Open Land.
P12/34	P12	Should protect and undertake limited enhancements to Wormwood Scrubs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. As such, existing communities in the north are not able to easily make use

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan.
P12/35	P12	Wormwood Scrubs should not be used as justification for on-site open space and it should not be used as a construction site.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy EU1 seeks to deliver a minimum of 30% of the developable area outside of SIL as publicly accessible open space. This does not include Wormwood Scrubs. Wormwood Scrubs would be protected from use as a construction site through the implementation of policies P12, EU1 and EU2.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
P12/36	P12	Only drainage of the pitches should be considered and Wormwood Scrubs should not be impacted by drainage measures within the development area	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Any potential use of Wormwood Scrubs as part of a strategic water management role would be carried out in accordance with policies P12, EU1, EU2 and EU3 to ensure the Scrubs continue to be a cherished public open space, important ecological asset and a protected area of Metropolitan Open Land.
P12/37	P12	Support the need for proposals to be agreed by LBHF and Wormwood Scrubs Charitable Trust	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
P12/38	P12	Wormwood Scrubs is not a strategic site and would benefit from neighbourhood plan guidance.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. On 12 September 2017 OPDC Board designated the Old Oak Neighbourhood Area which did not include Wormwood Scrubs. The determination was informed by a policy and factual matrix. Determination material is available to view online:

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	https://www.london.gov.uk/moderngovopdc/ieListDocuments.aspx?CId=378&MId=6074&Ver=4
P12/39	P12	Need local residents input into enchancements to the Scrubs. Removal of the Scrubs from the Neighbourhood Area has curtailed this.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's Statement of Community Involvement sets out OPDC's commitment to deliver high quality community consultation and engagement. This would include any proposals to enhance Wormwood Scrubs and any further relevant planning guidance.
P12/40	P12	Enhancements need to be accompanied by more effective management.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy P12 provides guidance to secure resources to deliver effective management. Use of these resources will be agreed with the Wormwood Scrubs Charitable Trust and the London Borough of Hammersmith and Fulham
P12/41	P12	Playing fields on Wormwood Scrubs should be protected. Walking and cycling routes should not dissect playing fields.	1	Sport England	Noted. Playing fields are a component element of Wormwood Scrubs. As such they benefit from policies P12, SP8 and EU2 to conserve and enhance publicly accessible open

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					space. As social infrastructure, these are also protected by Policy TCC4.
P12/42	P12	Support policies stating that Wormwood Scrubs and nearly parks should be improved, provided improvements are based on a robust PPS.	1	Sport England	Noted.
P12/43	P12	Policies for addressing flooding are not justified by evidence base	1	Wormwood Scrubs Charitable Trust	No change proposed. OPDC's Integrated Water Management Strategy identifies that there is a tendency for surface water on Wormwood Scrubs which needs to be addressed as part of proposals.
P12/44	P12	Evidence should be provided for the need for any routes and enhancements to the Scrubs.	1	Wormwood Scrubs Charitable Trust	Noted. The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					enhanced access points will be implemented in accordance with Policy P12 which requires any proposals to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 in the protection of Metropolitan Open Land.
P12/45	P12	Segregated two way cycle lane along Scrubs Lane should not encroach upon the Scrubs.	1	Wormwood Scrubs Charitable Trust	The Local Plan Appendix confirms that all figures in the Local Plan should be treated as indicative reflecting the role of the Local Plan. Place policy figures are identified as diagrams in the introduction to the places chapter. Figure 4.42 (Scrubs Lane Place) shows the proposed segregated cycle lane adjacent to the eastern edge of Wormwood Scrubs. OPDC considers that this level of detail within the figures are appropriate to the role of the Local Plan. A future proposed Scrubs Lane Supplementary Planning Document (SPD) will be developed in due course. This will provide further proposed detailed guidance for the location and design of the cycle and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					pedestrian route along the west of Scrubs Lane. A draft of the Scrubs Lane SPD will be subject to public consultation provide opportunities to comment on and shape these detailed proposals.

Site Allocations

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SA/1	Site allocations	Site allocation 21 - 2 Portal Way The site at 2 Portal Way has a higher capacity for residential units, commercial floor space and jobs than that identified in the Development Capacity Study and Site Allocations in the Draft Local Plan. Capacities proposed are: - Circa 380 residential units; - Circa 5,000 sqm of commercial floor space; and - Provision of approximately 300 jobs on site.	1	Culinary Quarter Ltd	Change proposed. OPDC has updated the development capacity for 2 Portal Way reflecting the progression of the active planning application. Site allocations, P7 and the Development Capacity Study has been updated.
SA/2	Site allocations	Lakeside Drive site within First Central site allocation should be removed from the allocation and Twyford Abbey Road should be allocated.	1	Deloitte LLP (on behalf of Diageo)	No change proposed. OPDC's Development Capacity Study has carried out an assessment of deliverable and developable sites appropriate to the role of a Local Plan

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					in accordance with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. This identifies that development of the Lakeside Drive site, within the First Central Site Allocation is deliverable.
SA/3	Site allocations	Canal is in the wrong location on figure 4.2	1	Canal & River Trust	Change proposed. This desktop publishing error has been corrected.
SA/4	Site allocations	Support identification of Tea Crate site as a potential site, and support approach of identifying minimum home numbers, but feel assumption of 100 dwellings for 151 Scrubs Lane does not reflect development potential. Minimum capacity should be increased to 150 units. 151 Scrubs Lane is suitable for PRS development, but the low number of units identified for the site makes PRS unviable.	1	Remavon	No change proposed. OPDC considers the capacity identified for the site is appropriate and accords with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. The methodology for identifying this capacity is set out in OPDC's Development Capacity Study which is based on indicative capacities provided by the Scrubs Lane Development Framework Principles development capacity assessment. The site allocation target for the site is a minimum target. Additional capacity may be appropriate subject to proposals according with national guidance, London Plan Policies and Local Plan Policies.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SA/5	Site allocations	Delivery of the suggested commercial floorspace at 151 Scrubs Lane will be challenging in the early phases of the plan period.	1	Remavon	No change proposed. OPDC considers the capacity for commercial floorspace identified for the site is appropriate and accords with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. The methodology for identifying this capacity is set out in OPDC's Development Capacity Study which is based on indicative capacities provided by the Scrubs Lane Development Framework Principles development capacity assessment. Amended capacity may be appropriate subject to proposals according with national guidance, London Plan Policies and Local Plan Policies.
SA/6	Site allocations	Mitre Wharf site should be included as a site allocation as it has the potential to deliver over 100 homes.	1	Boropex Holdings Limited	Change proposed. Following the provision of updated development capacity information, Mitre Wharf will be identified as a site allocations.
SA/7	Site allocations	The plan is unsound as it does not identify Willesden Junction Station and surrounding land as a site allocation. The site should be allocated due to the urgent need to upgrade the station and surrounding sites as the key	1	London Borough of Brent	No change proposed. Site allocations within the Local Plan are used to help OPDC demonstrate its supply of land for new housing and commercial floorspace. They are not used to identify transport infrastructure. This

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		gateway to Old Oak in advance of Old Oak Common Station opening in 2026.			guidance is provided within Place Policy P11.
SA/8	Site allocations	The boundary of sites 11 and 12 in the site allocations should be amended to better reflect land ownership.	1	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. OPDC has amended the boundaries to better reflect land ownership of site allocations 11 and 12 in figure 4.2.
SA/9	Site allocations	The table should acknowledge that the development of Oaklands has commenced. The EMR site is capable of greater and earlier delivery of new homes and other development.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Change proposed. OPDC's Development Capacity Study has been updated to reflect the implementation of the related planning permission.
SA/10	Site allocations	The plan should acknowledge that the Cargiant site has a total capacity for a greater number of housing units and amount of commercial floorspace than that will be delivered in the plan period	1	Old Oak Park Limited	No change proposed. Housing targets within each place are expressed as minimums.
SA/11	Site allocations	Site allocations do not provide clarity on the range of building heights considered appropriate	1	St Quintin and Woodlands Neighbourhood Forum	No change proposed. Policies SP9 and Place Policies provide guidance for building height ranges based on relevant supporting evidence base studies.
SA/12	Site allocations	Site allocations should identify the scale and density to accord with NPPG paragraph 010. This lack of transparency on density and building heights renders the Local Plan unsound.	20	Nicky Guymer, Bruce Stephenson, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, TITRA, Midland Terrace Residents,	Change proposed. Paragraph 10 of the NPPF requires that "Plans and decisions need to take local circumstances into account, so that they respond to the different opportunites for achieving sustainable

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	development in different areas." Further detail regarding densities has been provided in policy SP9 supporting text and where supported by appropriate evidence base, building height ranges have been included in place policies.
SA/13	Site allocations	Twyford Tip site should be added as a site allocation with explicit reference to the quantum of floorspace permitted under the extant planning permission.	1	Ashia Centur Limited	No change proposed. Site allocations are informated by the Development Capacity Study which has been developed in accordance with national guidance. This guidance requires the DCS to consider whether development of the site is achievable. This is essentially a judgement about the economic viability of a site and whether development on that site will be delivered within a certain time period. Based on the existing implemented permission and the delay in completion, OPDC considers that achievability of the existing implemented scheme is currently not able to be achieved.
SA/14	Site Allocations	Site allocations should include smaller sites, including sites in the proposed new cluster.		John Cox	No change proposed. The site allocations have been identified based on information set out in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					OPDC's Development Capacity Study. The thresholds are: - Delivery of over 100 net additional housing units over the first ten years of the plan period; - Delivery of over 1000 net additional housing units during the 11 to 20 years of the plan period; - Delivery of over 10,000 sqm of commercial and/or industrial floorspace over the plan period. These site allocations have been identified and robustly assessed as being deliverable or developable within the plan period in accordance with national policy requirements. As such, the site allocations are aimed at demonstrating that OPDC is allocating sufficient land which is suitable for development in their area to meet its housing and job targets. Identifying site allocations does not exclude other sites, including smaller sites, from coming forward for development over the plan period - known as windfall sites.

4. Design

Introduction

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D01	Introduction	Policies should encourage and promote innovative solutions, international best practice and designs that can deliver high quality and smart design along with high density.	1	London Borough of Hammersmith and Fulham	No change proposed. Policies SP2, D1, D2, D4 and EU11 provide this guidance.
D02	Introduction	Figure 5.1: Gasholder Park, Kings Cross is not an appropriate precedent	1	Regents Network	Noted. OPDC considers that this open space to be an appropriate precedent for open spaces in Old Oak.
D03	ALL	Design policies present an effective framework to ensure buildings are well-designed, accessible and have appropriate amenity. Policies are supported	1	Association for Consultancy and Engineering (ACE)	Noted.

Policy D1: Securing High Quality Design

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D1/1	D1	Encourage developers to engage in pre-application discussions with statutory consultees.	1	Canal & River Trust	Change proposed. OPDC has made reference to engaging in pre-application discussions with other relevant statutory consultees within D1.
D1/2	D1	Planning policy should not involve itself with the appointment of appropriately	1	Old Oak Park Limited	Change proposed. This has been removed from the policy.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		qualified professional design firms by private developers. This requirement should be removed.			
D1/3	D1	Design guidelines are better secured through planning conditions. Request wording be amended to include planning conditions or, where this is not possible, section 106 agreements.	1	Old Oak Park Limited	Change proposed. OPDC has amended the supporting text to make reference to secure design guidelines as part of Section 106 agreements and / or planning conditions.
D1/4	D1	Policy is sound	14	A Somefun, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
D1/5	D1	Policy is unsound	1	Sarah Abrahart	Noted. OPDC considers Policy D1 to be sound.
D1/6	D1	Showing precedents of buildings of 8-14 storeys is unrealistic given what is proposed.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. OPDC considers the precedent of Tate Modern to be an appropriate precedent for delivering high quality design within a high-density area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D1/7	D1	The OPDC Place Review Group so far has not delivered any distinguished design. OPDC's Place Review Group should be reformed and include experienced lay members	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC's Place Review Group comprises a panel of built environment experts to provide independent advice for development proposals. A Community Review Group has been established to inform the development management process. This has been referenced in policy D1.
DI/8	D1	There is a potential conflict of interest between the role of the OPDC as 'Development Corporation' and 'Planning Authority'	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's plan making and development management roles as the local planning authority are implemented in accordance with legislation and national guidance. These duties are carried out separately to those as OPDC as a future potential landowner.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI/9	D1	Concerns that OPDC has a lack of commitment to high quality design.	13	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Wells House Road Residents Association, Catherine Sookha, Regents Network	Noted. OPDC is committed to developing a high quality built environment. The Local Plan contains a range of detailed policies to ensure that development delivers high quality design and high standards of sustainability.
DI/10	D1	Support D1b)v)	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
DI/11	D1	The policy is not effective. Further clarity required for setting out different options and proactive community engagement. It should refer to the need for engagement with local people, via neighbourhood forums, as	14	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	Change proposed. Proactive engagement is set out in OPDC's Statement of Community Involvement. This was updated in February 2017 to reflect requests by community groups to secure more effective engagement. The Community Review Group has been established to inform the development management process. This has been

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		early as possible in the design process.		Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Grand Union Alliance	referenced in D1. Policy D1 will continue to require major and strategic development proposals to undertaken proactive engagement with the community.
DI/12	D1	Figure 5.2: Tate Modern is an inappropriate precedent.	1	Regents Network	No change proposed. OPDC considers the precedent of Tate Modern to be an appropriate precedent for delivering high quality design within a high-density area.
DI/13	D1	Insufficient DM guidance to deliver Lifetime Neighbourhoods and achieve aspirations for SP2 and SP4	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the full range of Strategic Policies, Place Policies, Development Management Policies and those set out in the London Plan alongside national guidance facilitate the delivery of Lifetime Neighbourhoods within the OPDC area. Specifically, these are considered to deliver the three principles for Lifetime Neighbourhoods: 1. can get around – neighbourhoods which are well-connected and walkable. 2. as far as possible, can have a choice of homes, accessible. 3. belong to a cohesive community which fosters diversity, social interaction and social capital.
DI/14	D1	Further consideration of how high quality design is measured is required.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. Policy SP9 defines what the highest design quality should comprise. Relevant elements of this policy are reflected in the Local Plan Key Performance Indicators.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI/15	D1	Change policy title to "Securing High Quality Design and Lifetime Neighbourhoods". Refer to Lifetime Neighbourhoods within the opening sentence of D1 and through the policy including: - community ownership and security - adequate community orientated facilities and meeting places - adaptable and imaginative buildings that are designed to last for 150 years neighbourhoods that are inclusive, - human and beautiful, providing for whole communities with spiritual makers, facilitators and educators at their heart,	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Lifetime Neighbourhoods are referenced in Policy SP2 and D3. No change is proposed to the policy wording. Supporting community ownership is set out in Policy DI3, delivering community facilities is set out in policies SP4, TCC4 and place policies, delivering high quality resilient buildings is set out in policies SP2 and SP9.
DI/16	D1	Specify what 'relevant and appropriate' means in D1(a)	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. "Where relevant and appropriate" enables OPDC to consider how to respond to the unique aspects of individual

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	proposals in determining planning applications.
DI/17	D1	D1(b)iv is not consistent with NPPF para 57 due to it being limited to major and strategic schemes.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D1(a) complements D1(b)(iv) by setting out requirements for all development proposals. This ensures Policy D1 as a whole accords with NPPF paragraph 57.

Policy D2: Public Realm

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D2/1	D2	Policy is too restrictive on requirements for unrestricted public access. There may be instances where open space within a development scheme can also form part of the	1	Castlepride Limited	No change proposed. OPDC considers Policy D2 to enable sufficient provision for publicly assessible private realm to be closed for management and safety purposes while ensuring provision of

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		public realm but it is appropriate to limit public access.			open space is optimised across the OPDC area. This is in accordance with the Mayor's Public London Charter referred to in draft London Plan policy D7.
D2/2	D2	Policy should refer to Healthy Streets approach.	1	Transport for London (Group Planning)	Change proposed. OPDC considers references to Healthy Streets would be appropriate to help deliver the Mayor's aspirations for health and well being. Policy D2 has been amended accordingly.
D2/3	D2	Public access to private realm is dependent on phasing and should be determined through a S106 agreement. This part of the policy should be removed	1	Old Oak Park Limited	No change proposed. OPDC considers Policy D2 to enable sufficient provision for publicly assessible private realm to be closed for management and safety purposes while ensuring provision of open space is optimised across the OPDC area. This is in accordance with the Mayor's Public London Charter referred to in draft London Plan policy D7.
D2/4	D2	Requirements to provide details of cleaning and maintenance is too detailed for outline planning applications where design details may not have been finalised. This part of the policy should be removed.	1	Old Oak Park Limited	Change proposed. OPDC considers it appropriate to reflect the type of planning application in requirements for management and maintenance strategies. The supporting text has been amended accordingly.
D2/5	D2	Policy is unsound	1	Sarah Abrahart	No change proposed OPDC considers D2 is sound.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D2/6	D2	Support for Policy	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
D2/7	D2	Canary Wharf, the Olympic Park and Royal Borough of Kensington and Chelsea also provide good precedents for public realm. OPDC should consider prepare guidance on the choice of materials and standard designs for hard landscaping.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is currently considering whether to develop public realm supplementary guidance following adoption of the Local Plan.
D2/8	D2	Need to be clearer about the need for public realm to be genuinely public.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D2 provides guidance ensuring public access to privately owned public realm in accordance with the Mayor's Public London Charter referred to in draft London Plan policy D7. The ownership of open space will be considered on a case by case basis in discussion with

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					relevant stakeholders including boroughs.
D2/9	D2	Figure 5.3 Elephant and Castle is an appropriate precedent.	1	Regents Network	Noted.
D2/10	D2	North Acton has poor quality public realm. This sets a poor precedent for the rest of the OPDC area and does not accord with NPPF para 58.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies SP2, SP9, D2 and P7 provide guidance to delivery new high quality public realm and improve the existing public realm of North Acton.
D2/11	D2	Developer led public realm needs coordination by OPDC	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy D2 provides policy to ensure public realm across different land ownerships is coordinated.
D2/12	D2	Lunchtime spaces needed. Canal public realm needs to be improved.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	Noted. Policy P3, P4, P5 and P6 provide policy for delivering new and improved public realm in Park Royal and along the Grand Union Canal.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D2/13	D2	Suggested public realm activation could include a range of activities for all ages.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy D3 provides policy for delivering accessible and inclusive public realm with Policy D9 also providing guidance for delivering play and recreation for all ages.
D2/14	D2	Mode separation is required for all transport types.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy T1 provides guidance for movement functions of streets and the public realm. Policy T1 ensures all new streets are built and designed in accordance wih all relevant standards, appropriate to local characteristics and demands. Policies T2 and T3 provide guidance for delivering safe and secure walking and cycling routes.
D2/15	D2	Permeability and legibility need to be balanced with street enclosure vs. legibility	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. Policies D2, D4, D5, D6 and SP9 provide a policy approach that provides the tools to balance local character,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	amenity of the public realm, built form and legibility.
D2/16	D2	A balance of roles of public realm for local services vs destination areas is required.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies D2, TCC8 and Place Policies provide guidance to deliver multi-functional public realm including a range of roles.
D2/17	D2	Landscaping strategy is required	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is currently considering whether to develop public realm supplementary guidance following adoption of the Local Plan.This may include specific landscaping guidance.
D2/18	D2	Connections to surrounding areas is key	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Noted. Policies SP7 and T1 provide policies for delivering connections to surrounding areas.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

Policy D3: Accessible and Inclusive Design

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D3/1	D3	Figure 5.4: Peter's Hill is not an appropriate precedent.	1	Regents Network	No change proposed. OPDC considers Peter's Hill to be an appropriate precedent.
D3/2	D3	Refer to different ages of the community and ensure development is designed to enable activity for the elderly.	14	Grand Union Alliance, Bini Ghebreyes, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Age is one of the elements required to be considered in delivering accessible and inclusive design within the Mayor's Accessible London SPG. Policy D3 seeks to deliver development that is compliant with the latest guidance on accessible and inclusive design as an integral part of their design. As such considering age is addressed in Policy D3.
D3/3	D3	Refer to income levels.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. Policy D3 refers to all users which encompasses different income levels.

				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D3/4	D3	Refer to changing needs	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC considers it appropriate to refer to the changing needs of people to delivery an accessible and inclusive environment. Policy D3 has been amended accordingly.

Policy D4: Well-Designed Buildings

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D4/1	D4	Welcome any changes to the plan that will improve fire safety for the future residents	1	Hammersmith and Fulham Council	Change proposed. OPDC considers it appropriate to provide clarity regarding the role of Building Regulations and planning policy in delivering the highest standards of fire safety. Policy D4 has been amended to reflect draft London Plan policy and Building Regulations requirements.
D4/2	D4	Principles of circular economy should also be included in D4: Well Design Buildings.	1	LWARB	No change proposed. Policy EU7 provides guidance for delivering the principles of the Circular Economy within development.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D4/3	D4	Add another requirement to deliver urban greening onto suitable surfaces, including vertical greening.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU2 provides guidance for delivering urban greening within development.
D4/4	D4	Policy is unsound, unjustified and unclear	3	Arnaud Demas, Sarah Abrahart	No change proposed. OPDC considers D4 is sound.
D4/5	D4	Plan will result in overdevelopment.	1	Ron Thorp	No change proposed. Local Plan policies, London Plan policies, national guidance and other material considerations will be used to deliver a high quality high density environment.
D4/6	D4	Support policy, but have concerns regarding how designs will be assessed.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is committed to developing a high quality built environment. The Local Plan contains a range of detailed policies to ensure that development delivers high quality design and high standards of sustainability.
D4/7	D4	Generally, support D4 but towers cannot respond positively to character or make a positive contribution to the townscape.	1	Regents Network	No change proposed. Local Plan policies SP9, D2, D4, D5, current and draft London Plan policies provide guidance for ensuring tall buildings respond positively to character and make a positive contribution to townscape. OPDC considers that tall buildings, if well designed and in the right

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					location, can contribute to local character and positively contribute to the skyline.
D4/8	D4	Figure 5.5: Trafalgar Place, Elephant and Castle is a better precedent but it lacks 'homeliness'	1	Regents Network	Noted. OPDC considers Trafalgar Place is an appropriate precedent.
D4/9	D4	Policy should reflect NPPF para 66 requiring applicants to evolve designs with input from the community.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D1 provides guidance for ensuring designs respond to views of the community in accordance with OPDC's Statement of Community Involvement.
D4/10	D4	Play space should not be on roofs	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D9 requires child play space to be delivered in accordance with the latest OPDC and GLA guidance. The Mayor of London's Play and Recreation SPG states that "In new developments, the use of roofs and terraces may provide an alternative to ground floor open space where they are safe, large enough, attractive and suitable for children to play, careful consideration should be given to these options, including the need for supervision and any restrictions that this might put on the use of

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the facilities" and "the use of roofs, terraces and indoor space can be an alternative to ground floor open space but issues about safety and supervision should be given careful consideration". As such, play space at roof level could be appropriate subject to meeting requirements set out in the Local Plan, London Plan and the Play and Recreation SPG.
D4/11	D4	Do not support use of excessive glass in the developments	1	Regents Network	Noted. Policy D6 provides guidance for considering the impact of light on amenity of building users and the public realm.

Policy D5: Tall Buildings

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D5/1	D5	Generally, support approach to tall buildings, but suggest additional sites not currently identified, including 19 Abbey Road, which would be suitable for tall buildings.	1	T.A.S.B. Investments Limited	No change proposed. The Local Plan provides guidance for the location of tall buildings in accordance with Draft New London Plan policy D8. This coordinates information from a range of supporting studies and a review or precedent developments to define locations where tall buildings are an appropriate form of development in principle.
D5/2	D5	Use of term "outstanding" for measuring tall building design is too subjective.	1	Castlepride Limited	Noted. This element of the policy has been removed to avoid repetition of Draft New London Plan Policy D8.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D5/3	D5	Clarification sought for statement setting out how development will deliver significant benefits in accordance with paragraph 5.41.	1	Old Oak Park Limited	No change proposed. Policy D5 and policies supporting text identify potential significant benefits. Securing benefits and defining their delivery will be carried out on a site by site basis.
D5/4	D5	Too many tall buildings are proposed.	1	Ron Thorp	No change proposed. The Local Plan provides guidance for a range of building heights based on supporting evidence studies. Policies SP2, SP9, D4, D5, D6 and Place Policies provide guidance for delivering high quality high density development including tall buildings.
D5/5	D5	Heights are driven by untested London Plan development capacities. This is demonstrated by tall buildings planned along Scrubs Lane. Rationale is not justified.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the homes and jobs targets for each place are justified. These are based on development capacity information set out in OPDC's Development Capacity Study. This has been developed in accordance with National Planning Practice Guidance for Housing and Economic Land Availability Assessments. The Development Capacity Study is based on development capacity information set out in the Old Oak North Development Framework Principles the Industrial Land Review, Future Employment Growth Sectors Study, Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					provided specific information for development capacity for the Development Capacity Study. Justification for tall buildings is set out in the Scrubs Lane Development Framework Principles and OPDC's Tall Building Statement.
D5/6	D5	Tall buildings have no place in West London and will blight Wormwood Scrubs.	1	Sarah Abrahart	No change proposed. High quality tall buildings at appropriate locations will be a component element of the built character and environment of the OPDC area. This is set out in OPDC's Tall Building Statement. The Draft New London Plan Policy D8 also recognises that Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations. Policy P12 sets out guidance for managing impacts on Wormwood Scrubs.
D5/7	D5	OPDC needs to reconsider its approach to tall buildings in light of the Grenfell Tower tragedy including considering fire risk and associated costs.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	Change proposed. OPDC considers it appropriate to provide clarity regarding the role of Building Regulations and planning policy in delivering the highest standards of fire safety. Policy D4 has been amended to reflect draft London Plan policy D11 and Building Regulations requirements. This will

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	be applied to all buildings including tall buildings.
D5/8	D5	High rise blocks seem synonymous with luxury development, might also be left empty for much of the time. This does not support lifetime neighbourhoods	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policies SP2, SP4 provide guidance for development to contribute to delivering Lifetime Neighbourhoods. Policy H1 sets out OPDC's aspirations to work with developers to ensure that wherever possible homes delivered are marketed to and occupied by people who live and work in London.
D5/9	D5	High rise development makes it more challenging to deliver affordable housing	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC recognises that delivering affordable housing in tall buildings can be challenging and this is reflected in the assessments of different densities within OPDC's Affordable Housing Viability Assessment supporting study. However, OPDC also recognises that affordable housing can be delivered across a range of building heights subject to addressing relevant challenges.
D5/10	D5	OPDC should provide evidence for consideration of	13	Grand Union Alliance, Wells House Road	No change proposed. Policy D5 has been amended to meet the requirements of the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		costs and challenges to deliver tall buildings		Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Draft New London Plan in delivering planning policies for defining the height and location of tall buildings appropriate to the role of a Local Plan. This process is set out in OPDC's Tall Buildings Statement. Evidence for the consideration of costs and challenges to the deliver tall buildings/height densities is set out in OPDC's Whole Plan Viability Study. This tests the ability of a range of development types throughout the OPDC area to viably meet the policy requirements of the Local Plan in accordance with national and best practice guidance. This identifies that viability looks less favourable in the higher density schemes at lower values and higher benchmark land values. However, it goes on to highlight that such schemes will most likely only come forward where the values achievable are able to meet the costs of delivering tall/high density schemes. Therefore, it would be reasonable to expect such schemes to achieve above the mid sales values and more likely the higher sales values.
D5/11	D5	OPDC should look at international case studies to examine good and bad examples of optimising	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. Case studies have been explored in OPDC's Precedents Study and Development Capacity Study. In some instances, high densities can be achieved without tall buildings, but in others, OPDC

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		density without having to build high-rise buildings		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	considers it appropriate for development to deliver tall buildings.
D5/12	D5	Energy demand and low carbon development is challenging at high densities	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The Draft New London Plan continues to provide guidance for delivering low carbon development. OPDC will be publishing supplementary guidance to define how this can be achieved at in tall buildings and high densities.
D5/13	D5	Should provide alternatives to delivering tall buildings as set out in the Environmental Standards Study	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Defining alternatives to tall buildings would not be in general conformity with the Draft New London Plan. Change proposed. Policy D5 has been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. The information supporting this definition is set out in

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					OPDC's Tall Building Statement. Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings.
D5/14	D5	Policy should align with London Plan Policy 7.7 including requiring links to surrounding areas.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the policy is in general conformity with London Plan policy 7.7 and aligns with draft London Plan Policy D8. Policies SP7 and T1 provide guidance to ensure the OPDC area is well connected to surrrounding areas.
D5/15	D5	The Local Plan should set out a presumpton that tall buildings will not be accepted. It should define that any building taller than	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Change proposed. Policies SP9 and D5 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		27 metres is a tall building. There should be an automatic trigger for special assessment.		Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Any building above this height would be subject to the policies set out in Draft New London Plan Policy D8 and Local Plan Policy D5. Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings.
D5/16	D5	A Parliamentary enquiry in 2002 found that tall buildings are not essential to the urban renaissance.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D5/17	D5	The Local Plan needs to consider historic context in the location of tall buildings.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies SP9, D4, D5 and D8 provide guidance for ensuring tall buildings conserve and enhance the historic environment. Draft London Plan policy D8 also requires proposals for tall buildings to take account of, and avoid harm to, the signifiance of London's heritage assets.
D5/18	D5	The Local Plan needs to consider 'Tall Buildings' Historic England guidance note.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Policies SP9 and D5 have been amended to provide the definition of a tall building for the OPDC area based on the requirements set out in the Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Any building above this height would be subject to the policies set out in Draft New London Plan Policy D8 and Local Plan Policy D5. Change proposed. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support policy SP9. This information is based on the considerations set out in Draft New London Plan Policy D8 as considered in relevant

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					supporting studies. Where appropriate, the places chapters set out more specificity about general building heights including appropriate locations for tall buildings.
D5/19	D5	The Local Plan should give careful consideration to how a tall building meets the ground.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies D2, D4 and D5 provide guidance for the relationship between tall buildings and the public realm. Draft New London Plan policy D8 also provides guidance for considering the base of tall buildings and relationship with the street.
D5/20	D5	Tall buildings must be assessed on a number of key factors and meet related requirements	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Alongside Policies SP2, SP9, D2 and D4, Policy D5 sets out these criteria. The London Plan Policy 7.7 and draft London Plan Policy D8 also provide guidance for assessing proposals for tall buildings.
D5/21	D5	D5c)ii) and D5c)iii) are not justified. The assertion that tall buildings can aid legibility	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association,	No change proposed. The use of building heights to support local legibility is recognised in London Plan paragraph 7.27 and draft London Plan Policy D8.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		and provide identity to areas is not supported.		Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D5/22	D5	Tall buildings will create a separation between Old Oak and surrounding areas.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. Local Plan policies SP7 and T1 provide guidance to ensure existing surrounding areas are well connected to Old Oak.

Policy D6: Amenity

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D6/1	D6	Policy D6 should be more flexible regarding daylight and sunlight levels when increasing density and for open spaces.	1	Castlepride Limited	No change proposed. OPDC considers Policy D6 provides sufficient flexibility to secure appropriate levels of daylight and sunlight.
D6/2	D6	Broad support for policy D6	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

Policy D7: Key Views

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D7/1	D7	Support for policy D7	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D7/2	D7	Policy is unsound	1	Sarah Abrahart	No change proposed. No reason has been given as to why the policy is unsound.
D7/3	D7	Clarity required for whether views are protected from within the OPDC area or surrounding areas	1	Scott Cawley	Change proposed. The supporting text has been amended to provide clarity that the policy applies to development within the OPDC area.
D7/4	D7	Additional key view from the Round Pond in Kensington Gardens is proposed.	1	Royal Borough of Kensington and Chelsea	No change proposed. OPDC does not consider it appropriate to identify Kensington Gardens Round Pond as a viewing point as development is highly unlikely to be viewable from this location.
D7/5	D7	Clarification sought about policy D7 and relationship to other mechanisms managing views. Suggest that a refined policy approach is taken to managing different types of view. Object to inclusion of kinetic views from railway lines and those outside of LVMF views or related to designated heritage assets.	1	Old Oak Park Limited	Change proposed. OPDC considers it appropriate to provide further clarification for the role and assessment of kinetic views.
D7/6	D7	Too much detail is required about effects on key views. This is better determined in an EIA scoping exercise	1	Old Oak Park Limited	No change proposed. OPDC considers that supporting information aligns with standard practice for Townscape/Visual Impact

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Assessments and should be included to inform EIA scoping considerations.

Policy D8: Heritage

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D8/1	D8	Support approach to working with stakeholders to address heritage assets at risk	1	Historic England	Noted.
D8/2	D8	Suggest completion of outstanding conservation area appraisals, in particular for Cumberland Park Factory and St Mary's Cemetery.	1	Historic England	Noted. OPDC is progressing the development new conservation area designations and refreshing existing conservation areas appraisals and management guidelines.
D8/3	D8	Support development of a Local List and / or other non-designated heritage assets	14	Historic England, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC has consulted on local heritage listings, including the Local List.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D8/4	D8	D8 should provide policy for how designated heritage assets will be considered rather than defer to the NPPF and national guidance. This will ensure accordance with NPPF paragraphs 9, 12 and 126.	1	Historic England	Change proposed. The policy has been amended to include policy guidance for designated heritage assets.
D8/5	D8	D8 needs to clarify whether it relates to scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, or archaeology which is neither. If the latter the policy reference is fine but if not the policy is the wrong test. You may wish to qualify Part (d) as follows: "Where harm can be fully justified, where relevant, the Council will require archaeological excavation and/or recording as appropriate, an Archaeological Impact	1	Historic England	Change proposed. The OPDC area does not have any scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments. As such, OPDC considers that Policy D8 accords with National Planning Policy Framework paragraph 123 and National Planning Policy Guidance Paragraph: 040 Reference ID: 18a-040-20140306. To provide clarity and consistency with national guidance, the supporting text has been amended accordingly.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Assessment and publication of the results."			
D8/6	D8	Policy could refer to the statutory test for development proposals within conservation areas.	1	Historic England	No change proposed. OPDC does not consider it necessary to repeat legislation and national guidance for managing conservation areas.
D8/7	D8	Policy should refer to the role of Historic Environment Record, Local List, Conservation Area Appraisals and Management Plans in shaping future change within the plan area.	1	Historic England	Change proposed. The supporting text has been amended to make reference to the use of heritage tools in shaping the future of an area.
D8/8	D8	Policy is unsound	1	Sarah Abrahart	No change proposed. No reason has been given as to why the policy is unsound.
D8/9	D8	Paragraph 5.65 states a commitment in to work with RBKC regarding heritage assets within the borough that are on the Heritage at Risk Register, which is welcomed.	1	Royal Borough of Kensington and Chelsea	Noted.
D8/10	D8	There are several important heritage buildings in the OPDC area	1	Hammersmith and Fulham Historic Buildings Group	Noted.
D8/11	D8	Should commemorate the heritage of the area through street and building names	1	Hammersmith and Fulham Historic Buildings Group	Noted. This is not a planning policy issue. Street names and building names are agreed by the local authority but OPDC will work positively with the relevant local authority to

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					try to ensure that heritage is referenced through building and street names.
D8/12	D8	Support Hammersmith and Fulham Historic Buildings Group's analysis of heritage assets and Old Oak Outline Historic Area Assessment	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
D8/13	D8	Support heritage led development, where appropriate.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
D8/14	D8	The area should build on the existing cultural heritage and industrial legacy	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Noted. Policy D8 through OPDC's Heritage Themes provide this guidance.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D8/15	D8	Figure 5.8: German Gymnasium, Kings Cross is not an appropriate precedent.	1	Regents Network	No change proposed. OPDC considers the German Gymnasium to be an appropriate precedent.
D8/16	D8	Figure 5.9: The Eagle, Old Street is not an appropriate precedent.	1	Regents Network	No change proposed. OPDC considers the Eagle to be an appropriate precedent.
D8/17	D8	The canal is a considerable heritage item which is not recognised in the Local Plan	1	Regents Network	No change proposed. OPDC considers the Grand Union Canal is appropriately recognised as a key asset throughout the Local Plan.
D8/18	D8	Numerous suggestions for features along the canal that should be considered as being of interest for heritage	1	Regents Network	Noted. OPDC will use this information to inform the development of the Grand Union Canal Conservation Area Appraisal and Management Guidelines.
D8/19	D8	Support for depicting assets on policies map	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
D8/20	D8	Welcome identification of the Canal as of heritage theme, but would suggest further wording to require relationship between themes is considered in applications.	1	Canal & River Trust	Change proposed. OPDC considers it appropriate to deliver a holistic approach in conserving and enhancing OPDC's heritage themes. Policy D8 has been amended accordingly.
D8/21	D8	Non-designated heritage assets should be maintained as a live register and not designated within the Local Plan.	1	London Borough of Ealing	Noted. OPDC has separately consulted on local heritage listings, including the Local List.
D8/22	D8	The Castle pub does not meet the criteria to be locally listed as set out by Historic England and Ealing Council. The emphasis of draft policies TCC7 and P7C1 should be reworded accordingly.	1	Citrus Group and Fuller Smith & Turner	No change proposed OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that The Castle Pub exhibited sufficient local heritage significance to warrant its proposed designated as a non-designated heritage asset on OPDC's Local List. This is based on the recognition that it has historic, townscape, architectural and social signifiance. It is one of the few character buildings remaining in the area. The corner turret is a local landmark that contributes to the building providing a positive juxtaposition to the surrounding built form.
D8/23	D8	Clarity is required for:	1	Old Oak Park Limited	No change proposed. OPDC considers the policy and supporting text to be sufficiently

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		How promoting heritage assets relates to NPPF's requirement to sustain and enhance heritage assets. Sequentional approach for managing non-designated assets. Table 5.3 relating to non-designated assets goes beyond NPPF requirements to taken into account non-designated assets' significance. Lack of guidance for designated assets.			clear in defining out promoting and enhancing the significance of heritage assets can include their reuse. No change proposed. OPDC considers the approach to managing non-designated heritage assets accords with NPPF paragraph 135 and to support the provision of a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset. Change proposed. OPDC considers it appropriate to provide policy that reflects NPPF guidance to conserve and enhance designated heritage assets. Policy D8 has been amended accordingly.
D8/24	D8	Additional detail should be added to the policy with regard to conservation areas.	1	London Borough of Hammersmith and Fulham	Change proposed. Additional information for managing the demolition of buildings in conservation areas has been added to supporting text to policy D8.
D8/25	D8	Policy should provide clarity regarding securing planning contributions to conserve and enhance heritage assets	1	Historic England	Change proposed. The supporting text has been amended to make reference to securing planning obligations to conserve and enhance heritage assets.

Policy D9: Play Space

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
D9/1	D9	Support requirement for development to provide or contribute to play space.	1	Sport England	Noted.
D9/2	D9	Not all dedicated play space for 0 to 5s should be publicly accessible within small open spaces or pocket parks. Change to "where appropriate"	1	Old Oak Park Limited	No change proposed. OPDC considers that seeking to deliver dedicate play space in publicly accessible open space will support maximising abilities to play in a high density environment. OPDC also recognises that not all sites will be able to contribute to the delivery of play space in publicly accessible open space. This is particularly relevant for early development sites and those outside of Old Oak North and South. D9 refers to delivering these spaces "as a priority" to provide an appropriate level of flexibility. Draft New London Plan policy S4 also seeks to deliver play provision that can be accessed form the street and forms an integral part of the surrounding neighbourhoods.
D9/3	D9	Target for 4 hours sunlight on 50% of playspace on 21 March will be challenging given the densities required to meet the housing targets	2	Old Oak Park Limited, Castlepride Limited	Change proposed. Although OPDC considers that delivering a minimum amount of 4 hours of solar exposure on 50% of dedicated child play space to be critical in delivering well-used play space, supporting text to the policy has been amended to reflect that this may be challenging in a high density environment.
D9/4	D9	The focus on the provision of play space for 0-5 year olds	1	London Borough of Hammersmith and Fulham	No change proposed. Policy D9 does provide policy for over 5s, but the GLA

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		is welcomed but more development is required for the planning for provision for play for 6 to 18 year olds. As well as designated play spaces the environment needs to be designed to enable street play close to where children live and as schools are modified or built.			provides more detailed guidance on play in the London Plan and SPG, which has not been repeated here.
D9/5	D9	Support provision of play space, and this is particularly important for teenagers / older children.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted
D9/6	D9	Air quality policy EU4 should be cross referenced with this policy. Question use of where relevant and appropriate in relation to delivering this policy.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	Change proposed. The text has been amended to cross-reference Policy EU4.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
D9/7	D9	Play facilities should be provided for all ages and linked to SP8 and D2	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy D9 requires development to contribute to maximising opportunities for play for all ages. The Policy links section makes reference to all design policies and Strategic Policy SP8.
D9/8	D9	Permitted play space currently does not meet Local Plan requirements. Play space should not be roofs.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Mayor of London's Play and Recreation SPG states: "In new developments, the use of roofs and terraces may provide an alternative to ground floor open space where they are safe, large enough, attractive and suitable for children to play, careful consideration should be given to these options, including the need for supervision and any restrictions that this might put on the use of the facilities" and "The use of roofs, terraces and indoor space can be an alternative to ground floor open space but issues about safety and supervision should be given careful consideration". OPDC considers the provision of play space above ground floor

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					is appropriate subject to meeting this guidance and that set out in D9. Schemes granted planning permission by OPDC planning committee meet the requirements of the Mayor of London's Play and Recreation SPG and D9.
D9/10	D9	Development at Old Oak should provide ample child play space for existing and new communities to combat rising childhood obesity levels.	1	Bini Ghebreyes	Noted. The amount of open space to meet need will be delivered in accordance with the latest OPDC and GLA guidance. Currently this is informed by GLA's Population Yield Calculator and Play and Recreation SPG.
D9/11	D9	Active Design should be clearly referenced across relevant Design policies.	1	Sport England	Change proposed. OPDC has amended the text to make reference to encouraging activity to be beneficial to the health and well-being of local people.

6: Environment and Utilities

Policy EU1: Open Space

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU1/1	EU1	MOL should be offered stronger protection in the policy and resupplying MOL elsewhere is not sufficient if MOL is lost. This policy does not accord with London Plan para 7.56	1	Wormwood Scrubs Charitable Trust	No change proposed. Metropolitan Open Land (MOL) benefits from the same national guidance as Green Belt. OPDC considers that policy EU1 accords with the National Planning Policy Framework paragraph 88. Strong protection to Wormwood Scrubs as MOL is also set out in Policy P12.
EU1/2	EU1	Wording of Policy EU1 should be amended to justify the loss of underutilised open space.	1	Diageo	No change proposed. OPDC does not agree that underutilised open space should be lost. Currently there is a lack of open space across the area and a need for additional provision. Where open space is poorly utilised OPDC will seek to improve utilisation by securing enhancements to the open space and securing improved access.
EU1/3	EU1	Concern that the policy is too prescriptive and could undermine opportunities to deliver open space that may not fulfil the criteria but could be beneficial	1	Castlepride Ltd	No change proposed. OPDC consider that the criteria are reasonably broad and flexible whilst ensuring that sufficient green space is provided which will fulfil the functional requirements of green infrastructure.
EU1/4	EU1	The separation of MOL and other areas of open space insinuates weaker protection for non MOL open spaces.	1	Sport England	No change proposed. MOL has special status in planning and OPDC therefore believes that it is important to highlight this. However, OPDC also recognises the importance of all open space and therefore

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					has policies to protect green space in SP8 and EU1 and to expand the provision of spaces for recreation, sport, amenity and ecology.
EU1/5	EU1	Policy a) in EU1 which states development in WWS will only be permitted in very special circumstances is inconsistent with other policies in the local plan, e.g.: P12c) which refers to the enhancement of Wormwood Scrubs by providing play space and improving functionality and accessibility in 3.88	1	Old Oak Park Ltd	No change proposed. OPDC does not consider that policy EU1, which provides the strongest protection for MOL and conforms with the London Plan, conflicts with the enhancement of Wormwood Scrubs. The two policies are not mutually exclusive.
EU1/6	EU1	Requirement for 30% of developable area as public open space is excessive given the proximity to Wormwood Scrubs	1	Old Oak Park Ltd	No change proposed. OPDC does not consider 30% open land to be excessive. The evidence collected suggests that 30%, which equates to 4.1m2 per person across Old Oak is modest. This has been benchmarked against other large-scale regeneration projects in London in order to derive an appropriate target. By comparison, the average across the LBHF is 13 m2 per person. Access to Wormwood Scrubs is currently constrained. Evidence collected by the GLA suggests that providing open and accessible space within 400ms of homes, close to schools and along safe routes significantly increases the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					amount of time people spend in parks, helps to improve healthy outcomes and can contribute to better air quality, SuDS, and quality of place.
EU1/7	EU1	Objection to requiring payments for residents and workers separately as they would use the same open space but at different times	1	Old Oak Park Ltd	No change proposed. The overall target is to ensure that 30% of the area is open green space. To achieve this, residential and non-residential developments will be required to make a contribution to open space where this target cannot be achieved on-site. The contribution will be calculated based on the population yield of the development. Some developments will be exclusively residential, some will be non-residential and others will include a mix of uses. OPDC consider that the fairest way to determine how much space should be delivered or what the contribution should be, is to share the contribution across both residential and commercial development but to reflect the higher importance residents place on provision of accessible open space.
EU1/8	EU1	Support the delivery of a minimum of 30% of publicly accessible open space as long as this does not include open space being provided to make up for losses elsewhere in the	1	LBHF	No change proposed. The target is for a total of 30% of the area to be public open space. Currently there is a significant shortage of public open space and reprovision will not in itself achieve the target.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		OPDC area. This should be clearly identified in the AMR.			
EU1/9	EU1	Information needed on how contributions for open space will be calculated and what happens if open space cannot be delivered off site.	1	LBHF	No change proposed. Further details on calculations will be included in OPDC's Planning Obligations SPD. There are a significant number of public open spaces around and within the OPDC area in need of enhancement and OPDC is therefore contented that there will be the ability to utilise off-site contributions.
EU1/10	EU1	Welcome part d) of policy	1	LBHF	Noted.
EU1/11	EU1	there is a chronic lack of green space	1	Local resident	No change proposed. OPDC's policies seek to increase green space provision across policies SP8, EU1 and EU2.
EU1/12	EU1	lack of monitoring details	1	Martin Cain, Friary Park Preservation Group	No change proposed. The approach to monitoring is addressed in OPDC's key performance indicators.
EU1/13	EU1	Policy unsound - no justification	1	Sarah Abrahart, Local Resident	No change proposed. OPDC considers that the policy is sound.
EU1/14	EU1	Need a variety of open space provision and creation of a sense of ownership	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan supports the delivery of a range of open spaces. OPDC will work with developers to encourage a sense of local ownership and to ensure that space is accessible to all.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU1/15	EU1	Broadly support EU1 policy	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
EU1/16	EU1	Should reference that Wormwood Scrubs MOL derives its protection from an Act but that ownership and management are through LBHF	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Reference to the need for the WSCT and LBHF to agree any proposals is made in Policy P12
EU1/17	EU1	Question whether Eu1d) will be effective as concerned that private open space intended for public access cannot be appropriately protected through conditions.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. Public access to private realm can be controlled through S106. Controls in respect of this are set out in Policy D2.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU1/18	EU1	Not an effective policy as it fails to recognise different types of green space	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. A wide range of open space provision has been addressed in the Local Plan. Part d) of the policy requires open space to provide for a variety of functions, including incorporating biodiversity and urban greening. In addition, developers will be required to conform with London Plan provision for play areas and other amenity. Policy EU2 also requires development to be biodiversity positive.
EU1/19	EU1	Support the target but warn that 30% public open space could result in tall buildings impacting on surrounding areas	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Proposals for tall buildings would need to be assessed against relevant planning policy, including policies in the local plan, London Plan and against other material planning considerations.
EU1/20	EU1	OPDC has not notified or supported communities establishing Local Green Spaces	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association,	No change proposed. This is dealt with in policy DI3 which supports community build, ownership and management arrangements. OPDC will seek to work with local

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	communities to identify and establish local open spaces where viable.
EU1/21	EU1	Concern over who provides publicly accessible open space and how access is guaranteed in the long run if it is in private hands. Also issue of definition of publicly accessible open space and public open space.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The wording has been standardised through the Local Plan to 'publicly accessible open space'.
EU1/22	EU1	Need provision of public open space in Park Royal for workforce	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC recognises the need for public open space in Park Royal and the place policies have identified where these should be delivered. It is not considered appropriate to secure 30% public open space in SIL, where schemes are likely to be industrial led and compromise public open space quality and function.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU1/23	EU1	Accessible greenspace suitable for children from Wells House Road should be provided as part of new development.	4	Wells House Road Residents Association, Catherine Sookha, Joanna Betts, Ralph Scully	No change proposed. The Local Plan covers provision of publicly accessible open space throughout the area and will work to ensure that adequate publicly accessible open space is provided.
EU1/24	EU1	The second statement in bullet point a) is not considered to be in accordance with national or London Plan policy on MOL. Bullet point (b) is also unacceptable. Currently there is scope for developers to comply with the policy but cause undesirable impacts in terms of access to open space. Para 6.14 should not allow developers to obviate their responsibilities to contribute to the overall quota of Open Space.	14	LBHF, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Access has been added to the policy. OPDC considers that the policy complies with the NPPF and is in general conformity with the London Plan and NPPF. Paragraph 6.14 does not allow developers to obviate their responsibility but rather recognises and makes allowances for the fact that on some sites there is insufficient land or the land that is available is in a location that will not make a valuable contribution to the overall provision of green space.
EU1/25	EU1	Query about whether the list of requirements in d) is required of every private and communal open space	2	Old Oak Park Ltd, Castlepride Ltd	Change proposed. The wording has been amended to recognise that it is a number of the requirements, not necessarily all.
EU1/26	EU1	Policy EU1 should recognise the function of open space in providing sport and recreation.	1	Sport England	Change proposed. This has been added to the policy.
EU1/27	EU1	Role of sport and recreation in open spaces has not been given enough prominence and	1	Sport England	Change proposed. The role of sport and recreation will be further strengthened in Policy TCC6 which will cross reference

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		should be mentioned specifically in the policy including protection against the loss of playing fields given the difficulty in reproviding in an area of this character.			EU1. In addition, the wording in supporting text has been amended to strengthen this objective.

Policy EU2: Urban Greening and Biodiversity

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU2/1	EU2	Strong support for EU2	14	Environment Agency, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted
EU2/2	EU2	Monitoring should be based on a robustly assessed baseline and ensure that the evidence base includes	1	Environment Agency	No change proposed. Applicants would be required to establish baselines through their Green Infrastructure and Open Space Management Plans.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		detailed ecological studies and audits to establish a baseline and gaps.			
EU2/3	EU2	Welcome monitoring reference in EU2 f)	1	Environment Agency	Noted.
EU2/4	EU2	Concerned about weak wording in the opening paragraph of the text. Should revise EU2 to reflect the intention to “secure” rather than “seek to ensure”.	1	LBHF	Change proposed. The wording has been amended to remove 'seek to'.
EU2/5	EU2	lack of monitoring details	1	Friary Park Preservation Group	Noted. OPDC will provide an annual authority monitoring report which will report on progress in delivering Local Plan policies.
EU2/6	EU2	Policy unsound - no justification	1	Local resident	No change proposed. OPDC considers that the policy is sound.
EU2/7	EU2	Need greater emphasis on tree planting and thought to tree planting as part of street design	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy T1 a) provides policy to support delivery of a healthy street network, which promotes the use of street trees. Policy EU2 promotes planting of mature and semi-mature trees along all streets.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU2/8	EU2	Should support provision of allotments, both temporary and permanent	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policies EU1, P4 and D6 promote the provision of space for local food growing, which would include allotments.
EU2/9	EU2	There should be temporary greening during the construction phases.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan supports the provision of meanwhile uses, including open space, within Policy TCC9.
EU2/10	EU2	Development will disrupt green corridors along railway lines	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. Where a green corridor, SINCs and open space is disrupted or impacted on, developers are required to provide equivalent compensation in line with Policy EU2.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU2/11	EU2	Development will negatively impact biodiversity	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policies EU1 and EU2 seek to protect and enhance existing open space and biodiversity, increase green cover and provide a net gain in biodiversity. Where biodiversity is impacted developers will be required to provide equivalent compensation.
EU2/12	EU2	More information is required on Urban Greening Factor	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The London Plan sets out more details on the Urban Greening Factor. SPG/SPD will be developed in due course.
EU2/13	EU2	Concern expressed about how variable and diverse urban greening will be.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. The intention is that urban greening will be multi-functional and enhance the biodiversity in the area. An Urban Greening Factor policy has been included in the new draft London Plan

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	(2017), which has been adopted in the OPDC Local Plan. The intention of the Urban Greening Factor is to ensure that a high quality of urban greening is provided.
EU2/14	EU2	Landscape planting should avoid high maintenance costs	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Management and maintenance costs will be taken into account when proposals are submitted by developers. Management and maintenance arrangements are required to be set out as part of Green Infrastructure and Open Space Strategies and Management Plans.
EU2/15	EU2	Semi wild areas should be retained	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The intention, set out in EU1 and EU2, is to preserve and enhance wherever possible all areas of existing green space and secure compensation where areas cannot be preserved. These must be of an equal function, quantum and quality. This includes semi wild areas which, where feasible, will be retained. Where invasive and non-native species are identified, these will have to be removed.
EU2/16	EU2	A tree and shrub community nursery/facility should be	13	Grand Union Alliance, Wells House Road	No change proposed. This is outside the scope of the Local Plan and would be

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		established on Wormwood Scrubs		Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	assessed against planning policy, which seeks to protect and enhance Wormwood Scrubs and protect its character as MOL.
EU2/17	EU2	Policy lacks necessary strategy, analysis and proposals	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the policies and supporting studies provide a robust level of evidence appropriate to the role and function of the Local Plan.
EU2/18	EU2	The canal warrants particular biodiversity policy focus and additional green corridors should be created across boroughs.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. Noted. Policy P3 sets out the importance of the Grand Union Canal to green infrastructure. The Grand Union Canal and the railway embankments are important green corridors that contain a good range of species. They will continue to be protected and enhanced. The Grand Union Canal is also part of the Blue Ribbon Network which the London Plan seeks to preserve and enhance.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
EU2/19	EU2	EU2 b)vi) could be strengthened	1	Environment Agency	Change proposed. The supporting text has been strengthened to support the use of resilient species on buildings and in the public realm that are cost effective to maintain over the long term.
EU2/20	EU2	If plans to widen Victoria Road are carried out, mitigating action should be taken to replace lost trees and vegetation.	1	Douglas Hunt	Change proposed. The loss of trees on Victoria Road and Cerebros Gardens will result from changes caused by HS2, which is governed by a separate legislative process. HS2 are guided by the London to West Midlands Act 2017. However, OPDC will seek to ensure that where vegetation or habitat is lost, it is replaced. The supporting text in EU2 has been amended to strengthen this requirement. OPDC will work with HS2 to encourage them to replace any planting that is lost with like for like planting. In addition, EU1 requires that 3 new parks are provided across the Old Oak area and 30% of the area is set aside for public open space.
EU2/21	EU2	Need a policy to address light pollution and its impacts on wildlife and amenity.	15	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	Change proposed. The impact of light pollution is considered in Policy D6. Reference to the need to consider the impacts of light pollution on biodiversity has been added to the supporting text and the policy requires environmental impacts to be considered.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

Policy EU3: Water

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU3/1	EU3	CRT support the use of the canal as an integral part of the strategic urban drainage system subject to modelling and investment in outfalls and other upgrades to ensure the canal network is resilient.	1	CRT	Noted.
EU3/2	EU3	Support for greenfield run off rates	1	RBKC	Noted.
EU3/3	EU3	Policy should clearly state that Counters Creek is at full capacity and no net additional flow can go into the creek from development.	15	RBKC, Old Oak Interim Neighbourhood Forum, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	Change proposed. The supporting text has been amended to make it clear that Counters Creek sewer is at capacity.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
EU3/4	EU3	Support cross references and reinforcement of SuDS in different policies	1	RBKC	Noted
EU3/5	EU3	Strongly support EU3 but would like to see it strengthened by including Water Framework Directive and River Basin Management Plan requirements, WFD improvement measures, and references to retrofitting existing uses.	1	Environment Agency	Change proposed. Noted, the Water Framework Directive and River Basin Management Plan is addressed nationally through legislation and published guidance. OPDC have addressed the Water Framework Directive in the Integrated Water Management Study which supports the Local Plan. OPDC therefore believes that the framework has been adequately referenced. Reference to both the Water Framework Directive and Thames River Basin Management Plan has now been appropriately referenced in the policy an supporting text.
EU3/6	EU3	There is concern that the hierarchy does not include collection of rainwater and greywater for re-use. The current London Plan Drainage Hierarchy puts rainwater harvesting at the top of the list, so there is an inconsistency in the approach of Policy EU3.	1	LBHF	No change proposed. The Local Plan does include in EU3 delivery of on-site water re-use technologies including rainwater and grey water recycling where these are viable. OPDC's evidence shows this will be most viable in non-residential developments, hence the slant of the policy. In addition, the Local Plan does not seek to repeat London Plan policy as all developments will be expected to conform with NPPF and London Plan policy.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU3/7	EU3	Para 6.33 should be strengthened to require that developments achieve the highest standards of sustainable development, not just “seek to ensure” this.	1	LBHF	No change proposed. OPDC cannot ensure that developments will achieve the highest standards of sustainable development but will do everything in its power to promote sustainable development subject to viability.
EU3/8	EU3	In para 6.38 the use of the Grand Union Canal as part of an integrated approach to managing surface water run-off can only work if the Canal and River Trust provide consent for such discharges. OPDC should work closely with CRT to ensure that this option is maximised where feasible.	1	LBHF	No change proposed. OPDC are working with CRT and CRT have responded positively to this policy.
EU3/9	EU3	The emphasis in para 6.39 on the use of above ground measures in preference to underground attenuation tanks is welcomed.	1	LBHF	Noted
EU3/10	EU3	lack of monitoring details	1	Friary Park Preservation Group	No change proposed. Monitoring will be included in the Authority Monitoring Report.
EU3/11	EU3	Add "ensure sustainable drainage over the whole development area does not adversely affect Wormwood Scrubs, and takes measure to avoid flooding”	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. The use of sustainable drainage will have to be designed so that it does not adversely impact on the area as a whole and MOL is already protected in Policy EU1 and EU2.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Addressing flooding on the Scrubs is already dealt with in P12.
EU3/12	EU3	This policy should refer to the potential use of the canal for heating and cooling	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy EU10 refers to the use of the canal as a potential source of heat and CRT have responded positively to this suggestion in their response to the consultation. Cooling is also dealt with in the policy but evidence suggests coolth networks will only be appropriate as part of large-scale commercial developments and the phased delivery of these is not likely to occur for another 10+ years.
EU3/13	EU3	The storm relief sewer for Counters Creek is not guaranteed to be delivered and this means the 24,000 homes figure is inadequately evidenced and not justified.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Counters Creek sewer upgrades relate to current capacity problems and do not relate to regeneration in the Old Oak area, where the requirement is to achieve greenfield run-off rates.
EU3/14	EU3	Expressed concern that if strategic SuDS that include	13	Grand Union Alliance, Wells House Road	No change proposed. Noted. OPDC are working with CRT and CRT have

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		use of canal and Wormwood Scrubs is not achieved cost on individual plots will be very high.		Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	responded positively to this policy. OPDC will do everything possible to ensure the development is viable without compromising the standards set out in the Local Plan. Achieving greenfield runoff rates is imperative as the sewer network is at capacity and the statutory undertaker has indicated they cannot provide any more capacity. As additional sewage will be generated through the development, rain water will have to be diverted from sewers and treated on site to compensate for the additional flow of sewage.
EU3/15	EU3	Flooding not addressed strategically but Counters Creek imposes considerable constraints	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC shares the consultees concerns and contends that flooding has been extensively addressed throughout the Local Plan, supported by the Integrated Water Management Study which accompanies the plan.
EU3/16	EU3	Concerns expressed about the impact of London water issues on viability of development	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. OPDC shares the consultees concerns about water issues and for this reason has addressed water issues in Policy EU3 and in the Integrated Water Management Study which accompanies the Plan. As well as seeking

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	funding from developers, in accordance with Policy DI1, OPDC will pursue alternative funding sources to deliver required infrastructure.
EU3/17	EU3	There is a lack of space for strategic SuDS and this needs to be resolved to address flood issues	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC officers consider that provision of strategic SuDS has been considered. SuDS will be integrated onto sites, into the canal where appropriate and subject to agreement with the CRT and into streets and open space provision.
EU3/18	EU3	Figure 6.5, pg. 167 should identify any designated Critical Drainage Areas within the OPDC area and clarify the locations in which Flood Risk Assessments are required.	1	RBKC	Change proposed. The critical drainage areas are covered in the Integrated Water Management Study which was published alongside the Local Plan. This includes a list of surface water critical drainage areas, and a plan (Figure C2) showing their location. Policy EU3 has been modified in order to reinforce the requirement for all developments to undertake FRAs for schemes meeting the thresholds set out in DEFRA and EA guidance.
EU3/19	EU3	Para 6.35 should refer to Boroughs roles as Lead Local Flood Authorities.	1	LBHF	Change proposed. The paragraph has been amended to reinforce the Local Authorities role as Lead Flood Authority

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU3/20	EU3	The need to carry out a Flood Risk Assessment in para 6.41 should not be limited to just major developments.	1	LBHF	Change proposed. The wording has been amended to align the requirements with Environment Agency and DEFRA guidance.
EU3/21	EU3	In para 6.42 it may not be appropriate to exclude all residential development from the requirement to use rainwater/greywater systems, as there could be some residential developments where this would be suitable.	1	LBHF	Change proposed. The Plan has been amended to require development to implement measures, but with the priority being within non-residential developments.
EU3/22	EU3	In para 6.43 OPDC could set a more stringent policy in terms of use of the 105 litres per day target.	1	LBHF	No change proposed. The policy seeks to meet or exceed the 105 litres per day target.

EU4: Air Quality

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU4/1	EU4	Concerns regarding noise, air and light pollution from construction over the next 10 to 30 years.	12	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton,	"Noted. Policy EU4 and table 6.1 provide policy for minimising air pollution and making a positive contribution to overall improvement in air quality. Policy EU5 provides policy for mitigating impacts of noise and vibration. In addition, the draft London Plan provides policies on mitigating pollution from construction which

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Wells House Road Residents Association	developers working in the OPDC area will be subject to. Change proposed. OPDC has amended D6 to provide clearer guidance for addressing light pollution."
EU4/2	EU4	P3 should support electrical connections along the canal to reduce air pollution from boats.		CRT	No change proposed. OPDC and CRT are in discussion about how the canal can be enhanced both for barges/boats and other users and are jointly developing a Canal Waterspace Strategy. Policy P3 promotes enhancement and use of the canal. Providing electric charging points will be considered through those discussions.
EU4/3	EU4	Strongly support EU4	1	Environment Agency	Noted.
EU4/4	EU4	Area has poor air quality and tall buildings will make this worse.	2	Local residents (Ron Thorp and Douglas Hunt)	No change proposed. Policy EU4 recognises the potential impact tall buildings have on air quality and seeks to mitigate this. The Supporting Air Quality Study that accompanies the draft Local Plan also seeks to address this. Developers will be required to demonstrate how they contribute to new draft London Plan requirements to deliver Air Quality Positive development.
EU4/5	EU4	lack of monitoring details but support air quality monitoring point in old oak lane	19	Friary Park Preservation Group, Martin Cain, TITRA (Mark Walker, Nicky Guymer, Bruce Stevenson), Midland Terrace Residents (Ewa Cwirk-Godycka, Nye Jones) , Wells House Road	No change proposed. Monitoring will be included in the Authority Monitoring Report.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU4/6	EU4	The Plan should require that no new development takes place in areas exceeding acceptable EU standards of maximum air and noise pollution. Sensitive uses should not be permitted in areas with poor air quality.	6	Wells House Road Residents, Joanna Betts, Marc and Caroline Francis, Lily Gray, Catherine Sookha	No changed proposed. Policy EU4 requires proposals to mitigate impacts to acceptable levels. It is not considered sound to implement a blanket ban on sensitive uses in such locations where impacts can be appropriately mitigated. Further, in line with the draft London Plan, OPDC will seek to ensure development contributes to air quality positive development.
EU4/7	EU4	Text from table 6.1 should be strengthened, and included in each place policy.	6	Wells House Road Residents, Joanna Betts, Marc and Caroline Francis, Lily Gray, Catherine Sookha	No change proposed. Policy EU4 will need to be complied with by all developers and will apply to all aspects of their proposal. It is therefore not considered necessary to include the table in each place policy. Further, in line with the draft London Plan (2017), all development will be required to demonstrate how it is contributing to the Mayor's air quality positive objective.
EU4/8	EU4	Support policy but should be clearer who the controlling and monitoring bodies are	14	Hammersmith Society, Tom Ryland, Wells House Road Residents	No changed proposed. Reference to the appropriate controlling and monitoring

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	bodies is made in the Local Plan where appropriate.
EU4/9	EU4	An additional policy (EU4.i) should require all major developments to use low emission vehicles during construction.	15	Old Oak Interim Neighbourhood Forum (Mark Walker), TITRA (Dave Turner, Mark Walker) , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Such a policy, although admirable, would require many SME companies to upgrade their fleets, meaning that they would be unlikely to tender for construction contracts in the OPDC area -thus impacting significantly on small businesses which OPDC is seeking to support. OPDC will however keep the potential for such a policy under review for consideration as part of future iterations of the Local Plan.
EU4/10	EU4	Air quality policy is weak and ineffective	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	Change proposed. The policy requiring Air Quality Assessments has been significantly strengthened to address stakeholder comments.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU4/11	EU4	A Low Emissions Neighbourhood (LEN) should be included as a policy and not just in the supporting text	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This is not something that can be designated through the Local Plan as it is a TfL scheme and applications must be made to TfL. However, the establishment of a LEN is promoted in the Plan and OPDC will review options to establish a LEN and promote better air quality in partnership with the GLA, TfL and local businesses and residents.
EU4/12	EU4	The policy doesn't provide a convincing strategic approach that will deliver good air quality in an area where growing number of people will live	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC officers believe the policy and supporting study are sound and will help to improve air quality in the area.
EU4/13	EU4	Proactive measures including green walls and planting should be adopted to reduce exposure to air pollution	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. Policy EU1 and EU2 encourage the use of open space, green infrastructure, green walls and planting more generally, which will support enhancements to air quality.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall	
EU4/14	EU4	As LBHF is an Air Quality Management Area under the 1995 Environment Act – Part IV, impacts of any development must be agreed with the Council. This should be established in this policy particularly as the Council is financially liable for EU fines if it fails to meet minimum standards for air quality. Policy EU4 should take into account LBHF policy CC10.	7	LBHF, Wells House Road Residents, Joanna Betts, Marc and Caroline Francis, Lily Gray, Catherine Sookha	Change proposed. The role of the Local Authority for Air Quality has been emphasised in the supporting text. In addition, the requirement for an Air Quality Assessment on major developments, which was previously set out in table 6.1 and the accompanying Air Quality Study has been given more prominence and included as a policy requirement, which closely aligns with the LBHF policy.

Policy EU5: Noise and Vibration

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU5/1	EU5	Poor quality construction and noise levels from Heathrow are incompatible with development	1	Local resident (Ron Thorpe)	No change proposed. OPDC cannot control the impacts from Heathrow but OPDC will work with developers, HS2, Heathrow and other projects to coordinate and minimise the impacts of major development on the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					area. Development will be expected to meet acceptable noise standards.
EU5/2	EU5	Lack of monitoring details	1	Friary Park Preservation Group	No change proposed. Monitoring will be included in the Authority Monitoring Report.
EU5/3	EU5	The Plan should require that no new development takes place in areas exceeding acceptable EU standards of maximum air and noise pollution, for example along Scrub Lane (Mitre Yard).	6	Wells House Road Residents, Joanna Betts, Marc and Caroline Francis, Lily Gray, Catherine Sookha	No change proposed. All new development will be required to demonstrate compliance with the most relevant and current building standards as set out in EU5, air quality policy EU4 and with Local Authority policies in their role as the responsible bodies for air quality.
EU5/4	EU5	Support policy but need to be clearer who controlling and monitoring bodies are	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No changed proposed. Reference to the appropriate controlling and monitoring bodies is made in the Local Plan where appropriate.
EU5/5	EU5	Policy not broad or proactive enough and should also include other emissions like odour, light, dust and risk from substances	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. These issues are dealt with at relevant points in the local Plan, but many of these points are addressed through the London Plan including in the Design and Construction SPG and environmental legislation and do not warrant repetition in OPDC's Local Plan. Light is dealt with in Policy D6 and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	environmental matters arising from construction activities (e.g. dust) are dealt with through Policy EU4 and T8.
EU5/6	EU5	Need to protect tranquil areas and improve the noise environment through the policy	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy EU5 seeks to protect and enhance noise quality.

Policy EU6: Waste

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/1	EU6	Park Royal should contribute more to waste management process. The Local Plan places too much reliance on the Powerday site in Old Oak. Plan should share out waste processing across Old Oak and Park Royal. There should be a stronger emphasis on waste being managed at source.	13	Old Oak Interim Neighbourhood Forum, TITRA, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. Policy EU6 and its supporting text refers to a number of waste sites across its area. The West London Waste Plan is part of OPDC's Development Plan and this includes more detail on waste sites identified in Park Royal. Policy EU7 on the Circular Economy approach will help ensure that less waste is generated and Policy EU6 requires Site Waste Management Plans to

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	demonstrate that waste is being managed, both during construction and operation, as high up the waste hierarchy as possible.
EU6/2	EU6	It is not possible to safeguard the Twyford Waste Transfer Station site as implemented permission exists to redevelop part of the site. Policy should reflect WLWP position. Figure 6.9 should be updated to reflect the correct land ownership details for the safeguarded Abbey Road waste site		Turley (on behalf of Ashia Centur Limited)	Change proposed. Figure supporting EU6 has been amended to reflect the boundary for the Twyford Waste Transfer Station allocated in the adopted West London Waste Plan.
EU6/3	EU6	Support policy reference to guidance on recycling and storage of waste		LWARB; Environment Agency	Noted.
EU6/4	EU6	Upholding policies in WLWP is welcomed, including the safeguarding of existing sites		London Borough of Ealing;	Noted.
EU6/5	EU6	Support EU6, including safeguarding sites, compensatory site provision, enclosure of facilities		Environment Agency	Noted.
EU6/6	EU6	Support EU6	15	Friary Park Preservation Group; Hammersmith Society; Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU6/7	EU6	The division between the roles and responsibilities of OPDC and the local authorities should be made clear.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. More text has been provided to clarify the roles and responsibilities related to waste.
EU6/8	EU6	Changes to London Plan waste apportionment targets might result in a need to review WLWP and the identification of more waste sites. Preference for OPDC to have a separate apportionment target and Local Plan should be future proofed to allow for this scenario.		London Borough of Ealing	Change proposed. The current London Plan is adopted and therefore has significant weight as part of OPDC's Development Plan. The supporting text has been updated to recognise that a new Draft London Plan has been published and the potential need for a future review of policy EU6, if changes are required in order to help host boroughs to meet higher waste apportionment targets. The new draft London Plan does not propose a separate apportionment target for OPDC and OPDC is supportive of this approach.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/9	EU6	Approach to compensatory provision should be revised to prioritise OPDC's area. Need to demonstrate that approach would be achievable/deliverable.		London Borough of Ealing	Change proposed. The sequential approach has been amended to prioritise finding sites within the OPDC area. In line with policy WLWP 1, the next step in the sequential process is for compensatory provision to made elsewhere within the relevant waste plan or authority area, this would include the whole of Ealing as well the rest of the boroughs covered by the WLWP. The applicant would need to demonstrate that the compensatory provision is available and therefore deliverable.
EU6/10	EU6	Clarify required on the status of the part of the WLWP relative to OPDC's Local Plan and to avoid duplication and inconsistencies.	14	London Borough of Ealing; Hammersmith, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The adopted WLWP policies will remain in place for part of the OPDC area that includes land within the London Boroughs of Brent and Ealing. This is already reflected in EU6 which requires proposals to comply with the WLWP policies where applicable. OPDC's Local Plan needs to include waste policies to cover the rest of its area which includes land within the London Borough of Hammersmith and Fulham, and therefore some duplication will be inevitable but necessary to provide comprehensive coverage of OPDC's area.
EU6/11	EU6	No policy on windfall sites so it is assumed WLWP policy 3 will continue to apply		London Borough of Ealing	No change proposed. The adopted WLWP policies will remain in place for part of the OPDC area that includes land within the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					London Boroughs of Brent and Ealing. This is already reflected in EU6 which requires proposals to comply with the WLWP policies where applicable.
EU6/12	EU6	Plan should identify all existing licenced waste management sites for safeguarding as per WLWP.		London Borough of Ealing	Change proposed. Policy EU6 has been amended to refer to all existing sites and the supporting text refers to the WLWP for further information.
EU6/13	EU6	Existing waste facilities, particularly Channel Gate, Quattro and Powerday. Powerday negatively impact residential areas and should not remain in its current location or increase its throughput. Greater emphasis should be on investing in the circular economy and at source disposal.	28	Bernie Timmins; Tim Potter; Lori Wiechec; Stuart McCaffer; Scott Cawley; Noam Lesham; Nicky Guymer; Bruce Stevenson; Oonagh Heron; Mark Walker; Jason Salkely; Dave Turner; TITRA; Grand Union Alliance; Ewa Cwirko-Godycka; Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Powerday is required to meet LBHF's waste apportionment targets and therefore it will continue to be safeguarded as a waste site. The other waste sites in the Plan have been identified as safeguarded sites in the adopted West London Waste Plan. These sites provide certainty that waste apportionment targets in Brent and Ealing can be met through the implementation of the WLWP. OPDC is not responsible for issuing waste permits or regulating waste management sites; these responsibilities are undertaken by the Environment Agency or the boroughs' Environmental Health departments. However policy EU6 seeks to ensure future proposals adequately mitigate their impact on amenity.
EU6/14	EU6	OPDC should continue to work positively with Western Riverside		Mayor of London	No change proposed. OPDC is co-operating with host boroughs to ensure

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		WPAs and other stakeholders to meet apportionment targets, and consider potential for additional capacity.			that their waste apportionments can be met as a priority in line paragraph 5.80 of the London Plan. OPDC host boroughs are Hammersmith and Fulham (LBHF), Brent and Ealing. The Waste Apportionment Study demonstrates how OPDC is meeting this obligation. In addition to this, OPDC has been working with the wider WRWA group (including LBHF) to prepare a joint Waste Technical Paper. This Waste Technical Paper forms part of the evidence base for OPDC's Local Plan. OPDC has no apportionment target and there is no formal agreement on pooling apportionment amongst the WRWA boroughs.
EU6/15	EU6	Object to proposal for Powerday site to become an energy from waste facility. Energy from waste using incineration is a fundamental misunderstanding of circular economy principles.	22	Nicky Guymer; Bruce Stevenson;bOonagh Heron; Mark Walker; Old Oak Interim Neighbourhood Forum; Dave Turner; TITRA; Grand Union Alliance; Ewa Cwirko-Godycka; Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. The Utilities Study has assessed options and sets out further detail on the approach and assessment of energy sources for the strategic district heating network. The heat source for an area wide network is yet to be determined. Energy from waste has the potential to be the largest and most viable low carbon heat source but there are other potential secondary heat sources that have been investigated, including ground source heat pumps and heat recovery from the Grand Union Canal. The waste hierarchy includes 'other recovery' as a step prior to

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	disposal and it at this stage in the hierarchy that energy from waste can make a contribution. Policy EU6 is clear that any such proposal should not shift the burden within the waste hierarchy from prevention, re-use or recycling.
EU6/16	EU6	Policy for managing construction waste is unrealistic and potentially harmful to local residential areas.	19	Nicky Guymer; Bruce Stevenson; Mark Walker; Dave Turner; TITRA; Ewa Cwirko-Godycka; Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The construction industry produces a significant amount of waste each year so it is right that OPDC should have ambitious targets for the re-use and recycling of construction materials. Major developments will be required to demonstrate how a minimum of 95% of excavation, demolition and construction waste will be re-used and/or recycled in line with the London Plan.
EU6/17	EU6	Policy requiring higher levels of recycling from residents is weak and ineffective. Policy should require more from developers as part of planning process. Need to fully integrate environmental infrastructure within housing developments and coordinate waste and recycling procedures across borough boundaries.	20	Nicky Guymer; Bruce Stevenson; Oonagh Heron; Mark Walker; Dave Turner; TITRA; Ewa Cwirko-Godycka; Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. Brent, Ealing and Hammersmith and Fulham Councils are responsible for waste collection within the OPDC area. Policy EU6 requires developers to put the correct measures in place to ensure that recycling rates can be improved through alignment with boroughs collection/management methods and the provision of appropriate details and training for occupants.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton; Grand Union Alliance	
EU6/18	EU6	Policy places reliance on out of date West London Waste plan, out of step with down-sized targets for waste in the current London Plan	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Powerday is required to meet LBHF's waste apportionment targets and therefore it will continue to be safeguarded as a waste site. The other waste sites in the Plan have been identified in the adopted West London Waste Plan (WLWP). The adopted WLWP policies will remain in place for part of the OPDC area that includes land within the London Boroughs of Brent and Ealing. It is noted that a new draft London Plan (2017) has been published with higher apportionment targets set out for Brent and Ealing and a reduced overall target for Hammersmith and Fulham by 2041. OPDC will continue to work positively with the host boroughs to help demonstrate how any revised London Plan apportionment targets would be met, and if necessary, this may trigger the review of this policy and relevant policies in the WLWP. Policy EU6 already includes criteria to allow for compensatory provision if waste sites are lost to a non-waste uses.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/19	EU6	Need to fully integrate environmental infrastructure within housing developments and coordinate waste and recycling procedures across borough boundaries.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Brent, Ealing and Hammersmith and Fulham Councils are responsible for domestic waste and recycling within the OPDC area. Policy EU6 requires developers to put the correct measures in place to ensure that recycling rates can be improved through alignment with boroughs collection/management methods and the provision of appropriate details and training for occupants.
EU6/20	EU6	There are major flaws in the evidence base behind the policy and that as a result the OPDC is failing to meet the London Plan requirement to ensure that Boroughs apportionment targets are met.		North London Waste Plan	No change proposed. The Waste Apportionment Study demonstrates how OPDC is helping the host boroughs to meet their apportionment. LBHF have confirmed that they support the approach to safeguarding Powerday to meet their targets.
EU6/21	EU6	Policy should focus on maximum throughput achieved over a five year period where compensatory provision is required.		North London Waste Plan	Change proposed. The supporting text has been amended to refer to mayoral guidance.
EU6/22	EU6	OPDC have been working effectively with Hammersmith & Fulham Council as well as the other boroughs within the WRWA area on waste matters.		London Borough of Hammersmith and Fulham	Noted.
EU6/23	EU6	Support safeguarding of the Powerday site.		London Borough of Hammersmith and Fulham	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/24	EU6	Concerned that policy does not afford safeguarded sites enough protection		London Borough of Hammersmith and Fulham	Change proposed. Text in policy EU6 has been removed to clarify that all waste sites are safeguarded in the same way. It also requires compensatory site provision if any waste management site is lost to a non-waste use to ensure no overall reduction in capacity. This approach is in line with the London Plan policy 5.17.
EU6/25	EU6	The capacity at EMR should be appropriately replaced, with priority given to any potential suitable locations within LBHF & then the WRWA area to ensure EMR capacity is not lost.		London Borough of Hammersmith and Fulham	No change proposed. The sequential approach prioritises finding sites within the OPDC area as this will give greater flexibility and a wider area of search to find suitable sites for waste. The sequential approach also includes a step which directs provision to the appropriate waste plan or authority area.
EU6/26	EU6	The wording should be enhanced to better explain how the re-provision would work and to confirm that this would only apply to non safeguarded sites		London Borough of Hammersmith and Fulham	Change proposed. Text in policy EU6 has been removed to clarify that all waste sites are safeguarded in the same way. It also requires compensatory site provision if any waste management site is lost to a non waste use to ensure no overall reduction in capacity. This approach is in line with the London Plan policy 5.17.
EU6/27	EU6	The wording of para 6.76 could be improved by referencing other relevant stakeholders		London Borough of Hammersmith and Fulham	Change proposed. Text updated to clarify that a range of stakeholders will be involved.
EU6/28	EU6	Planning for waste management is a strategic (cross-Borough) matter and subject to the legal		Royal Borough of Kensington and Chelsea	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		requirement of the Duty to Cooperate. OPDC has waste planning responsibilities, it does not have a waste apportionment target which it is required to meet.			
EU6/29	EU6	OPDC has waste planning responsibilities but it does not have a waste apportionment target which it is required to meet. OPDC has resisted committing to pooling apportionment targets and capacity with the Western Riverside WPAs.		Royal Borough of Kensington and Chelsea	No change proposed. OPDC has been working positively with LBHF, RBKC and WRWA as part of the Duty to Co-operate. Joint working arrangements has extended to the preparation of joint evidence base in the form of the WRWA Waste Technical Paper. The London Plan states that "where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met". OPDC host boroughs are Brent, Ealing and Hammersmith and Fulham and current evidence demonstrates how OPDC is meeting this requirement. However, it is noted that the new Draft London Plan indicates a significantly increased apportionment for two of our host boroughs - Ealing and Brent although for the third borough, LBHF there is an overall reduced apportionment. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					we will need to undertake further work to establish if the two host boroughs with increased apportionments can meet the increased requirement within their area. Therefore, we are unable to commit to an MOU on pooling with the WRWA WPAs until this further work has been undertaken. In the meantime, we remain committed as before to continue to work with the Western Riverside grouping in respect of ongoing waste evidence.
EU6/30	EU6	OPDC is releasing EMR on basis that it is not needed. However, the EMR facility is a vital contributor to the apportionment capacity for the Western Riverside WPAs.		Royal Borough of Kensington and Chelsea	No change proposed. The London Plan states that "where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met". OPDC host boroughs are Brent, Ealing and Hammersmith and Fulham and OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority. OPDC's Waste Apportionment Study demonstrates how OPDC is helping host boroughs to meet their targets and the rationale for releasing the EMR site. Notwithstanding this, EU6 includes a requirement for compensatory provision if any waste site is lost to a non waste use.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/31	EU6	If compensatory EMR capacity is not provided within LBH&F or the WR area the potential for pooling apportionment will be permanently lost. Suggest that Policy is amended to ensure replacement capacity is provided within the OPDC host borough in which the facility is located as a priority.		Royal Borough of Kensington and Chelsea	No change proposed. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority. OPDC's Waste Apportionment Study shows that the Old Oak Sidings (Powerday site) can meet LBHF's apportionment target and also provides a rationale for releasing the EMR site. The sequential approach in EU6 prioritises finding sites within the OPDC area as this will give greater flexibility and a wider area of search to find suitable sites for waste. The sequential approach also includes a step which directs provision to the appropriate waste plan or authority area.
EU6/32	EU6	Further information for optimising use of Powerday is required.		Royal Borough of Kensington and Chelsea	Change proposed. Additional text has been included to support a more efficient use of the Powerday site. Policies P1, EU6, EU10 and T7 also include measures/requirements that will ensure that the site is maximised. The Waste Apportionment Study includes more information on the potential capacity of the Powerday site.
EU6/33	EU6	Capacity is committed to assist RBKC in the current adopted LBHF Core Strategy. Disappointed to see that the arrangement has not		Royal Borough of Kensington and Chelsea	No change proposed. OPDC has been working positively with LBHF, RBKC and WRWA as part of the Duty to Co-operate. Joint working arrangements has extended to the preparation of joint evidence base in the form of the WRWA Waste Technical

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		been reflected in the OPDC Local Plan.			Paper. The London Plan states that "where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met". OPDC host boroughs are Brent, Ealing and Hammersmith and Fulham and current evidence demonstrates how OPDC is meeting this requirement. However, it is noted that the new Draft London Plan indicates a significantly increased apportionment for two of our host boroughs - Ealing and Brent although for the third borough, LBHF there is an overall reduced apportionment. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and we will need to undertake further work to establish if the two host boroughs with increased apportionments can meet the increased requirement within their area. Therefore, we are unable to commit to an MOU on pooling with the WRWA WPAs until this further work has been undertaken. In the meantime, we remain committed as before to continue to work with the Western Riverside grouping in respect of ongoing waste evidence.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/34	EU6	There is no detail in the Local Plan on how the district heating scheme at Powerday will operate.		North London Waste Plan	No change proposed. The Utilities Study has assessed options and sets out further detail on the approach and assessment of energy sources for the strategic district heating network. The heat source for an area wide network is yet to be determined. Energy from waste has the potential to be the largest and most viable low carbon heat source but there are other potential secondary heat sources that have been investigated including ground source heat pumps and heat recovery from the Grand Union Canal.
EU6/35	EU6	The wording could be enhanced to better explain how re-provision would work for non-safeguarded waste sites. Amend para 6.74.		LBHF	Change proposed. Text in policy EU6 has been removed to clarify that all waste sites are safeguarded in the same way. It also requires compensatory site provision if any waste management site is lost to a non waste use to ensure no overall reduction in capacity. This approach is in line with the London Plan policy 5.17.
EU6/36	EU6	Improve wording in para 6.76 to say OPDC will work with operators of waste sites, the EA, waste authorities, LAs, businesses and residents to find ways to introduce energy generation in a way that delivers benefits and addresses adverse impacts to the area.		LBHF	Change proposed. Text updated to clarify that a range of stakeholders will be involved.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/37	EU6	Plan does not adequately deal with waste plants in the area	12	Wells House Road Residents (Joanna Betts, Nicholas Kasic, Marc and Caroline Francis, Patrick Munroe, Lily Gray, Catherine Sookha, Ralph Scully, Mark Walker, Lynette Hollender,Jeremy Aspinall, Thomas Dyton)	No change proposed. Waste facilities are already covered by Policy EU6 and policies in the West London Waste Plan.
EU6/38	EU6	Changes to London Plan waste apportionment targets might result in a need to review WLWP and the identification of more waste sites. Preference for OPDC to have a separate apportionment target and Local Plan should be future proofed to allow for this scenario.		London Borough of Ealing	No change proposed. The current London Plan is adopted and therefore has significant weight as part of OPDC's Development Plan. The supporting text has been updated to recognise that a new Draft London Plan has been published and the potential need for a future review of policy EU6, if changes are required in order to help host boroughs to meet higher waste apportionment targets. The new draft London Plan does not propose a separate apportionment target for OPDC and OPDC is supportive of this approach.
EU6/39	EU6	Approach to compensatory provision should be revised to prioritise OPDC's area. Need to demonstrate that approach would be achievable/deliverable.		London Borough of Ealing	Change proposed. The sequential approach prioritises finding sites within the OPDC area as this will give greater flexibility and a wider area of search to find suitable sites for waste. The sequential approach also includes a step which directs provision to the appropriate waste plan or authority area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU6/40	EU6	Clarify required on the status of the part of the WLWP relative to OPDC's Local Plan and to avoid duplication and inconsistencies. The division of responsibilities between OPDC and local authorities should be made clear.	14	London Borough of Ealing; Hammersmith, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The adopted WLWP policies will remain in place for part of the OPDC area that includes land within the London Boroughs of Brent and Ealing. This is already reflected in EU6 which requires proposals to comply with the WLWP policies where applicable. OPDC's Local Plan needs to include waste policies to cover the rest of its area which includes land within the London Borough of Hammersmith and Fulham, and therefore some duplication will be inevitable but necessary to provide comprehensive coverage of OPDC's area.
EU6/41	EU6	OPDC's policy is major impediment to pooling and has not taken into account the wider Western Riverside joint working relationship or aims when developing the Plan and therefore has not fulfilled the Duty to Cooperate		Royal Borough of Kensington and Chelsea	No change proposed. OPDC has been working positively with LBHF, RBKC and WRWA as part of the Duty to Co-operate. Joint working arrangements has extended to the preparation of joint evidence base in the form of the WRWA Waste Technical Paper. The London Plan states that "where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met". OPDC host boroughs are Brent, Ealing and Hammersmith and Fulham and current evidence demonstrates how OPDC is meeting this requirement. It is noted that

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the new Draft London Plan indicates a significantly increased apportionment for two of our host boroughs - Ealing and Brent although for the third borough, LBHF there is an overall reduced apportionment. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and we will need to undertake further work to establish if the two host boroughs with increased apportionments can meet the increased requirement within their area. Therefore, we are unable to commit to an MOU on pooling with the WRWA WPAs until this further work has been undertaken. In the meantime, we remain committed as before to continue to work with the Western Riverside grouping in respect of ongoing waste evidence.
EU6/42	EU6	Further information for optimising use of Powerday is required.		Royal Borough of Kensington and Chelsea	Change proposed. Additional text has been included to support a more efficient use of the Powerday site. Policies P1, EU6, EU10 and T7 also include measures/requirements that will ensure that the site is maximised. The Waste Apportionment Study includes more information on the potential capacity of the Powerday site.
EU6/43	EU6	Capacity is committed to assist RBKC in the current adopted		Royal Borough of Kensington and Chelsea	No change proposed. OPDC has been working positively with LBHF, RBKC and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		LBHF Core Strategy. Disappointed to see that the arrangement has not been reflected in the OPDC Local Plan.			WRWA as part of the Duty to Co-operate. Joint working arrangements has extended to the preparation of joint evidence base in the form of the WRWA Waste Technical Paper. The London Plan states that "where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met". OPDC host boroughs are Brent, Ealing and Hammersmith and Fulham and current evidence demonstrates how OPDC is meeting this requirement. It is noted that the new Draft London Plan indicates a significantly increased apportionment for two of our host boroughs - Ealing and Brent although for the third borough, LBHF there is an overall reduced apportionment. OPDC is obligated to ensure that the apportionment targets of host boroughs can be met as a priority and we will need to undertake further work to establish if the two host boroughs with increased apportionments can meet the increased requirement within their area. Therefore, we are unable to commit to an MOU on pooling with the WRWA WPAs until this further work has been undertaken. In the meantime, we remain

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					committed as before to continue to work with the Western Riverside grouping in respect of ongoing waste evidence.
EU6/44	EU6	The wording could be enhanced to better explain how re-provision would work for non-safeguarded waste sites. Amend para 6.74.		LBHF	Change proposed. Text in policy EU6 has been removed to clarify that all waste sites are safeguarded in the same way. It also requires compensatory site provision if any waste management site is lost to a non waste use to ensure no overall reduction in capacity. This approach is in line with the London Plan policy 5.17.
EU6/45	EU6	Plan fails to control waste plants in the area	12	Wells House Road Residents (Joanna Betts, Nicholas Kasic, Marc and Caroline Francis, Patrick Munroe, Lily Gray, Catherine Sookha, Ralph Scully, Mark Walker, Lynette Hollender,Jeremy Aspinall, Thomas Dyton)	No change proposed. The policy sets out the strategy for managing waste across the OPDC area. All of the sites identified are required to help meet the waste management needs of Brent, Ealing and Hammersmith and Fulham. OPDC is not responsible for issuing waste permits or regulating waste management sites; these responsibilities are undertaken by the Environment Agency or the boroughs' Environmental Health departments. However policy EU6 seeks to ensure future proposals adequately mitigate their impact on amenity.
EU6/45	EU6	Figure 6.9 should be updated to reflect the correct land ownership details for the safeguarded Abbey Road waste site	1	Turley (on behalf of Ashia Centur Limited)	Change proposed. The boundary of the site identified as safeguarded for waste will refer to the WLWP for a detailed boundary.

Policy EU7: Circular and Sharing Economy

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU7/1	EU7	LWARB strongly support the inclusion of a policy devoted to the circular economy in the Local Plan.	1	LWARB	Noted
EU7/2	EU7	Strongly support the requirement for a circular and sharing economy statement and see OPDC as leading the way. LWARB would like to support development of circular economy SPG.	14	LWARB, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted
EU7/3	EU7	Support recognition that circular economy offers opportunity to support growth and innovation in Park Royal.	1	LWARB	Noted.
EU7/4	EU7	Fully support Policy EU7 on the Circular and Sharing Economy	1	North London Waste Plan	Noted
EU7/5	EU7	Policy is potentially too onerous and beyond what is required of development elesewhere in London and will restrict development at Old Oak. Sustainability policies should be proportionate and		Old Oak Park Ltd	No change proposed. OPDC considers that resource utilisation is a major issue that concerns large scale regeneration projects. The requirement for a Circular Economy Statement is now also a requirement in the new draft London Plan. Finding ways to minimise resource use and waste and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		appropriate when viewed alongside other requirements.			increase reuse and resource recovery over the life of the project will help reduce the embodied carbon impacts of the development. Further it supports the mayor's London Environment Strategy aspirations, efficient use of buildings, support for circular economy initiatives, waste management and clean tech employment targets. The London Plan and the London Environment Strategy requires OPDC to take a lead in promoting best practice in sustainable regeneration including in resource management. Waste and materials use are major issues in the construction sector and leading construction companies are starting to establish circular economy and resource efficient strategies that support this policy.
EU7/6	EU7	Support circular economy recommendations and opportunities, and would like to work with OPDC to capitalise on the opportunities that exist in Park Royal to establish the area as a leader in this area.	1	Park Royal Business Group	Noted. OPDC welcome the opportunity to work with PRBG to promote the circular economy in Park Royal.
EU7/7	EU7	lack of monitoring details	1	Friary Park Preservation Group	No change proposed. Monitoring will be included in the Authority Monitoring Report.
EU7/8	EU7	policy lacks clarity or specific requirements and examples	13	Grand Union Alliance, Wells House Road	No change proposed. OPDC believe the policy and supporting study on the circular

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	economy set out clear requirements and provide many examples and opportunities for adoption of the circular economy.
EU7/9	EU7	Questions whether EfW is a circular solution	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC believe EfW can be considered a circular solution if carefully and efficiently managed, where careful attention is paid to ensuring only appropriate materials are used, where appropriate technologies to screen, bail and treat the waste are used and heat networks provided to ensure the EfW makes a significant contribution to reduction in carbon emissions. In addition, EfW would not be permitted if it impacts inappropriately on air quality. As a matter of principle, OPDC promote the adoption of the waste hierarchy and encourage waste to be recycled as high up the hierarchy as possible in line with the existing and draft London Plan policy (2017).

Policy EU8: Sustainable Materials

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU8/1	EU8	Sustainability considerations need to be balanced with specific site conditions and viability.	1	Castlepride Ltd	Noted. This is recognised in Policy DI1.
EU8//2	EU8	The use of sustainable materials can only be considered with reference to the need to prioritise compliance with fire safety and other safety critical Building Regs. Amend bullet point (g)	1	LBHF	No change proposed. OPDC agree that buildings and the choice of materials, components and systems must comply with fire safety and other safety critical Building Regs. OPDC do not consider that this policy in any way challenges that position. The requirement to conform with safety and other building regulations falls outside of planning but reference to fire safety has been made in Policy D4.
EU8//3	EU8	Support the policy but need to consider the outcome of the Grenfell public inquiry.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Reference has been made to fire safety in policy D4.
EU8/4	EU8	Policy fails to address embodied carbon and could	13	Grand Union Alliance, Wells House Road	No change proposed. Policy EU8 e) does seek to address embodied carbon. OPDC will

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		adopt approaches used by 6 LAs across the England,		Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	also be developing an Environmental Standards SPD, which will further consider approaches to embodied carbon.
EU8/5	EU8	Need to address issue of indoor air quality in policy	1	Local Resident (Adrian Lafond)	Change proposed. Policy EU8 promotes the use of healthy materials and emphasises the importance of material selection and adequate ventilation for example in promoting good indoor air quality. Minor changes have been made to the supporting text.
EU8/6	EU8	Clarify wording in policy h) so that it is clear that 20% of materials should be from recycled or reused content for buildings, and infrastructure and landscape separately.	1	LWARB	Change proposed. The wording has been amended to make this clear.

Policy EU9: Minimising Carbon Emissions and Overheating

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU9/1	EU9	Welcome Para 6.100 on production of SPD guidance	1	LBHF	No change proposed. OPDC will adopt the draft London Plan approach to off-setting.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		on the carbon price to be charged and encourage OPDC to make this a priority. In particular clarity on how payments will be organised is necessary.			SPD will be developed in due course setting out OPDC's approach to carbon off-setting.
EU9/2	EU9	Policy not sound. No justification provided	1	Friary Park Preservation Group	No change proposed. OPDC officers believe the policy and supporting study are sound and will help to minimise carbon emissions and overheating in compliance with the London Plan.
EU9/3	EU9	Need to reinstate targets from Reg 18 and add reference to embodied carbon and building reuse	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Embodied carbon is addressed in EU8. The carbon targets in the Reg 18 plan are either included as they form part of National Policy or London Plan policy, which all development is required to conform with, or because it has been superseded. for example, all new homes now have to be zero carbon by 2016 as per the London Plan and Government legislation requires UK to reduce its carbon emissions by 80% by 2050.
EU9/4	EU9	Housing should be zero carbon including use of solar PV, hot water and green roofs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. OPDC requires housing to comply with the London Plan, which is for development to deliver a 35% reduction over Part L from on-site measures and to demonstrate how it will be fully zero carbon through on-site measures by 2050. OPDC cannot be prescriptive about how zero carbon is achieved. Every effort will be made to

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	promote the use of community and building scale renewables where viable. Carbon off-setting will be used where developments cannot achieve carbon reduction targets in line with the London Plan.
EU9/5	EU9	Policy does not align with Mayor's Zero Carbon London by 2050 aspiration or fully address overheating.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The draft Local Plan requires all developers to conform with the London Plan when bringing forward applications.
EU9/6	EU9	Should require new non-residential development to achieve BREEAM outstanding	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC officers will promote BREEAM outstanding but the Plan has to be viable and BREEAM excellent is considered to deliver a high standard of development whilst being financially viable. OPDC also expect development to contribute to a range of other benefits including delivery of affordable housing and green infrastructure for example.
EU9/7	EU9	Post construction audits are welcome and should include energy performance	13	Grand Union Alliance, Wells House Road Residents Association,	No change proposed. Noted, energy performance will be considered as part of the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	scope. Further guidance on this will be set out in OPDC's Post Occupancy Evaluation SPD.
EU9/8	EU9	The BREEAM requirement should be relocated to Policy D4	1	LBHF	Change proposed. OPDC agrees that it would sit better here and this has been relocated.

Policy EU10: Energy Systems

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU10/1	EU10	CRT support the use of cooling and heating from the canal, and would like to see it strengthened by requiring developers to test feasibility. Also include reference in GUC.18 and EU9.	1	CRT	No change proposed. OPDC and the GLA have policies that promote zero carbon development. In order to achieve this target developers will have to look for the most technically achievable and financially viable way to meet this target. OPDC will promote the use of low carbon heat and cooling networks where appropriate and are investigating different ways to promote this. OPDC will meet with CRT to discuss the potential to use the canal for heating and cooling including technical issues and capital and revenue costs.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU10/2	EU10	Hierarchy needs to consider specific site conditions and viability.	1	Castlepride Ltd	No change proposed. The hierarchy is set out in the London Plan and viability is always a consideration in accordance with national policy and Policy DI1. OPDC will promote adoption of the hierarchy where viable.
EU10/3	EU10	Welcome policy aspirations and requirements to support a low carbon and resilient energy network, but would suggest adding clarification text around demand forecasts for Park Royal.	1	Park Royal Business Group	No change proposed. OPDC accepts that demand needs to be managed and supply enhanced to meet the needs of existing and new businesses.
EU10/4	EU10	Support approach to developing a strategic decentralised heat network, but are concerned that polices, in particular Energy from Waste, are focused on Old Oak and not Park Royal.	1	Park Royal Business Group	No change proposed. Policy EU10 covers both Old Oak and Park Royal. OPDC will work with Park Royal Business Group to investigate opportunities to develop low carbon energy systems in Park Royal where appropriate.
EU10/5	EU10	Request that OPDC considers how the plan might address issues with power capacity to help new and existing businesses operate more effectively.		Segro	No change proposed. The Local Plan deals with the power requirements for new development and the requirements for this are also detailed in the Utilities Study and Infrastructure Delivery Plan.
EU10/6	EU10	Question whether the OPDC area is an appropriate location for energy from waste schemes and if all impacts be sufficiently	14	LBHF, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas	No change proposed. The policy promotes the adoption of the energy hierarchy in conformity with the London Plan and the supporting text highlights some of the low carbon heat sources that could be adopted subject to detailed review

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		mitigated, No evidence base presented. One consultee opposes EfW.		Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	and assessment of impacts. Air quality will have to be addressed as part of any proposal in line with the mayor's policy for Opportunity Areas to be Air Quality Positive, before OPDC will support any specific technology or proposal.
EU10/7	EU10	Policy not sound. No justification provided	1	Friary Park Preservation Group	No change proposed. OPDC officers believe the policy and supporting study are sound and will help to promote the use of low carbon energy systems in compliance with the London Plan.
EU10/8	EU10	As the highway authority and development agency, OPDC should ensure there is accurate mapping of utilities across the area	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is not the Highway Authority. The Host Boroughs have retained their responsibility for highways. However, OPDC in its capacity as a development corporation will work closely with the Boroughs to collect relevant data. Utilities data is presented in OPDC's Utilities Study.
EU10/9	EU10	Support policy but developers may resist this so OPDC needs to assist and manage the delivery of a district energy network	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	Noted. OPDC have done work to investigate different options for delivering a low carbon heat and cooling network.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EU10/10	EU10	Concern that ambition will not be achieved as policies not ambitious enough	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers the policy is ambitious, but has to balance ambition with viability and delivery. OPDC in its role as a development corporation will seek to work with partners, the GLA and government to deliver the highest standards of development possible within the financial and other constraints in which OPDC and its partners have to work.
EU10/11	EU10	Energy centre strategy could impact on amenity of area	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Energy centres would need to accord with other local plan policies such as air quality (EU4) and amenity (D6).
EU10/12	EU10	The decentralised energy system should be resilient and designed around a block level approach	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. OPDC's Utilities Study identifies a strategic network as a preference, which is shown to be more resilient and to potentially better support the Mayor's zero carbon aspirations, but if this is not in place or

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	feasible, the policy supports a development by development, or block by block approach.
EU10/13	EU10	The Policy is generally supported, but reference is needed to require all low carbon and communal combustion systems to demonstrate that they will not have unacceptable impact.	1	LBHF	No change proposed. Reference to the need for any proposal to accord with air quality policy EU4 is included in the supporting text. Any proposal would need to accord with other relevant policies in the local plan and the London Plan. The NPPF is also a material consideration. It is not considered appropriate to repeat this within the policy or supporting text.
EU10/14	EU10	The plan should recognise the need for a cooling network	15	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. This has been added as a policy requirement. Current work shows that this is only likely to be viable however, when delivering large-scale commercial developments.

Policy EU11: Smart Technology

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU11/1	EU11	Support the smart technology policy	1	Association for Consultancy and Engineering (ACE)	Noted.
EU11/2	EU11	It is not the responsibility of the planning system to govern broadband speeds etc and will increase the costs of development		Old Oak Park Ltd	No change proposed. Broadband is now considered a basic need alongside the other utilities. Providing good access to broadband supports social equality and economic vibrancy, which are strategic aims of the Local Plan.
EU11/3	EU11	The OPDC area suffers from poor quality broadband connections, and propose that planning conditions are set requiring developers to install highest level of broadband.	1	Park Royal Business Group	No change proposed. Policy EU11 promotes the provision of the highest quality broadband possible and appropriate ducting provision along key routes. More corporately, OPDC's Park Royal Programme Manager is working with the PRBG to deliver better broadband infrastructure in Park Royal.
EU11/4	EU11	Welcome the OPDC's acknowledgement of the broadband issue, and requests that OPDC takes an active role in instigating upgrades to fibre broadband as a matter of urgency.	1	Segro	Noted. OPDC are currently working on coordinating upgrades with Park Royal Business Group as part of OPDC's corporate activities.
EU11/5	EU11	The lack of detail about smart technology makes this narrative unsound	1	Friary Park Preservation Group	No change proposed. OPDC officers believe the policy and supporting study are sound and will promote the use of smart technologies.
EU11/6	EU11	support policy but consideration should be given	13	Hammersmith Society, Wells House Road	No change proposed. OPDC does not have responsibility or the authority to determine

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		to the ownership, management and storage of data		Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	who owns data or how it is managed or stored. OPDC will work with government and others however to review policy and understand its implications for OPDC.
EU11/7	EU11	Policy is dependent on individual developments and fails to take a strategic approach to broadband provision	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The development policies in the Local Plan have to focus on development. However, OPDC in its role as a development corporation is reviewing strategic approaches to infrastructure provision including broadband.
EU11/8	EU11	Support policies on Smart Technology, and suggest additional wording to emphasise the opportunity for Park Royal to act as a test bed for new technologies subject to improved broadband infrastructure.	1	Park Royal Business Group	No change proposed. OPDC wishes both Old Oak and Park Royal to be positioned to deliver appropriate smart technologies. OPDC does not consider it appropriate to identify Park Royal in particular, as a location where smart technologies should be tested.

Policy EU12: Extraction of Minerals

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU12/1	EU12	Assessment of applications for extraction of materials should promote use of secondary materials in conformity with principles of the circular economy.	1	LWARB	No change proposed. These policies are referenced as having policy links to this policy and would appropriately apply to any applications for extraction of minerals proposals.
EU12/2	EU12	Support policy on extraction of minerals	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
EU12/3	EU12	The policy lacks sufficient safeguards to address potential for mineral extraction	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the policy does have sufficient safeguards.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU12/4	EU12	the policy fails to safeguard rail and canal facilities in line with NPPF 143	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The NPPF requires sites for the transfer of minerals. OPDC supports the transfer of minerals through appropriate sites and supports maximising the use of rail and water to transfer such materials. With regards to mineral extraction, there are no known sites within the OPDC area used for this purpose however will be supported where they meet the aims and objectives of Policy EU12.

Policy EU13: Land Contamination

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EU13/1	EU13	Support EU13 but consider the version included in the Regulation 18 consultation to be stronger	1	Environment Agency	No change proposed. OPDC considers that the version in the revised draft Local plan is as strong as the Reg 18 version and that it appropriately addresses comments received on the Reg 18 Local Plan.
EU13/2	EU13	The plan should be regarded as unsound until a comprehensive assessment of land contamination has been undertaken.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. It is not the responsibility of the Local Plan to define exactly what the contamination requirements are. high level assumptions have however been provided within OPDC's Development Infrastructure Funding Study. This would need to be undertaken by developers on a site by site basis and

				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	appropriate remediation undertaken before development can commence.
EU13/3	EU13	The policy is not effective because it fails to take a strategic approach to long term and widespread contamination	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC officers consider that the policy is effective. Policy EU13 states that OPDC will work collaboratively with developers to consider the feasibility of a strategic approach to the remediation of land. However, OPDC as local planning authority cannot insist on a strategic approach if a strategic approach has not yet been established.

7. Transport

Introduction

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T/1	Introduction	Support text	1	ArtWest	Noted.
T/2	Introduction	""Exemplary" or "excellent" might be better wording	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the current wording to be appropriate.

PolicyT1: Roads and Streets

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T1/1	T1	Health Streets approach should not be considered above the Sustainable Transport Hierarchy.	1	Brent Cyclists	No change proposed. The Healthy Streets approach and sustainable transport hierarchy complement each other.
T1/2	T1	20mph speed limit should apply to all roads in the area.	1	Brent Cyclists	No change proposed. OPDC will work with the local highway authorities to implement 20mph speed limits, where possible, on roads in the OPDC area.
T1/3	T1	Discouragement is not sufficient - all through traffic should be prevented in new roads, and traffic calming should be avoided due to negative impacts on vulnerable road users.	1	Brent Cyclists	Change proposed. New routes to not allow through traffic. All proposals for new roads or amendments to existing streets will prioritise pedestrians and cyclists as the most important travel modes, followed by public transport and then, where appropriate, private vehicle therefore supporting the most vulnerable road users.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T1/4	T1	Controlled crossing should be supported by informal crossings.	1	Brent Cyclists	Noted.
T1/5	T1	Do not support any inclusion of shared space for streets acting as through routes.	1	Brent Cyclists	Noted. There is no explicit commitment to providing shared space on streets in the Local Plan. The Healthy Streets approach and sustainable transport hierarchy will be used to inform the design of streets.
T1/6	T1	Lack of clarity about access roads.	1	Friary Park Preservation Group	No change proposed. Information regarding access roads is provided in SP7, the places and in the network diagrams throughout the transport chapter.
T1/7	T1	Main streets won't deliver healthy streets principles	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC will work with TfL and the relevant highways authorities to champion the healthy streets principles on all new and existing roads in Old Oak and Park Royal. The intention is for all developments to contribute towards new and improved streets in line with the Heathy Streets Indicators.
T1/8	T1	Policy requires an accompanying map	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. A map is provided alongside Policy SP7 and this map is referenced in the supporting text.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T1/9	T1	Clearer defined east -west routes should be provided	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is proposing to implement a number of new high quality, legible east-west routes across the development area which are indicated in figures within SP7, the transport chapter and the relevant place policies.
T1/10	T1	Retention of Elizabeth Line Depot will prevent delivery of Old Oak High Street and development	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The development of the Elizabeth Line Depot is now identified to be delivered after the plan period. The Old Oak North Development Framework Principles document sets out a new movement network. This includes Old Oak Street (formally Old Oak High Street) and the location of the bridge to Old Oak South and on to Old Oak Common Station. This demonstrates that Old Oak Street can be delivered during the plan period.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T1/11	T1	Parts c and d are duplicates	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Adoptable standards are what Local Highway Authorities require for taking over maintanance of streets. Relevant standards refers to roads and streets being fit for purpose, with all the necessary components (including sengregated components if necessary) being considered.
T1/12	T1	Address existing transport issues of traffic across Park Royal and Old Oak.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC will work hard to deliver improvements to existing road, streets and transport networks. Ensuring the existing network is fit for purpose is the responsibility of the relevant highway authority. Measures identified in the Infrastructure Delivery Plan to support development will also benefit existing users.
T1/13	T1	Old Oak High Street should only be for walking and cycling. Through routes should be minimised	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. OPDC's Bus Strategy identifies that Old Oak High Street, now named Old Oak Street, should be delivered as a bus route. The street will also deliver high quality walking and cycling

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	infrastructure. Policy T1 discourages through routes.
T1/14	T1	All roads must be adopted and open to all.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. T1 states that all proposals for new roads must be in line with adoptable standards. Decisions over whether streets are adopted rests with the highway authority.
T1/15	T1	There should be a map next to T1 showing the roads and streets and the intended hierarchy	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The proposed connections are provided within SP7. These are referred to in T1.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T1/16	T1	Policy T1b) should specify how congestion will be addressed and connectivity will be achieved.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The supporting text expands on how OPDC will approach congestion and connectivity issues.
T1/17	T1	Need to consider how Scrubs Lane and Old Oak Lane will be impacted by vehicle movements from within the Old Oak area.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The SLDF and VROOLDF consider how both roads will be impacted by development in Old Oak. Required interventions on both streets are included in OPDC's Infrastructure Delivery Plan.
T1/18	T1	Should include a policy that addresses existing traffic problems	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. Policy T1 includes provision for improvements to existing streets as well as outlining standards for new streets and roads. OPDC's aspiration is for existing traffic issues to be addressed through a variety of measures outlined in the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	supporting text and included within OPDC's Infrastructure Delivery Plan.
T1/19	T1	References to widening Victoria Road into dual carriageway should be removed.	1	London Borough of Ealing	Change proposed. References to widening Victoria Road into a dual carriageway have been removed. This is not detailed in the transport chapter.
T1/20	T1	Policy should be stronger on requirement for segregated cycle lanes.	1	London Borough of Ealing	No change proposed. The LCDS will be used to guide all areas of cycling provision including where segregation is appropriate.
T1/21	T1	Wording regarding through routes and traffic in unclear.	1	London Borough of Ealing	Change proposed. Amendments have been made in SP7
T1/22	T1	Not clear what “all relevant standards” are and there is no information about on-street electric car charging points and disabled parking	1	London Borough of Hammersmith and Fulham	Change proposed. Text has been amended to ensure it is more specific regarding standards that should be adhered to. Policy T4 provides information on electric car charging points and disabled parking.
T1/23	T1	Positive references to the healthy streets approach are welcomed	1	Mayor of London	Noted.
T1/24	T1	Support for healthy streets	1	NHS London Healthy Urban Development Unit	Noted.
T1/25	T1	Development of the OPDC area will have a major impact on traffic in the surrounding areas, in particular Harlesden Town Centre. An earlier	1	Not logged	No change proposed. OPDC is encouraging a modal shift to more sustainable transport modes and limiting car parking in order to reduce the congestion arising from

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		suggestion for a bypass road through the OPDC area would help alleviate this.			development at Old Oak and to deliver Healthy Streets.
T1/26	T1	Road congestion is the most pressing problem facing businesses in Park Royal, and would benefit from better maintenance.	1	Park Royal Business Group	No change proposed. OPDC recognise the present difficulties with congestion and available parking in Park Royal. The policies in the Local Plan seek to improve streets so that they relieve congestion and better support business.
T1/27	T1	Consideration of new transport strategies for the area should include rapidly emerging technology.	1	Park Royal Business Group	Noted. T1 g) outlines the promotion of effective and integrated management of streets to futureproof technological changes.
T1/28	T1	Support the delivery of Healthy Streets approach, but suggest Active Design checklist is used by applicants instead of the Healthy Streets checklist.	1	Sport England	No change proposed. Whilst OPDC acknowledge the benefits of Active Design, the impact of Healthy Streets checklist is more widespread and inclusive. The design chapter deals with supporting active lifetstyles, as does policy SP3.
T1/29	T1	no solution to transport pinch-point at North Pole Road/Wood Lane	1	St Quintin and Woodlands Neighbourhood Forum	No change proposed. The Junction of North Pole Road / Wood Lane is not within OPDC area, however OPDC will work proactively with Hammersmith and Fulham when working on highway solutions.
T1/30	T1	TfL suggests that this should read ‘minimise and mitigate the impact…’	1	Transport for London (Group Planning)	Change proposed- text suggestion has been incorporated.
T1/31	T1	Note that Healthy Streets Check tool is still undergoing	1	Transport for London (Group Planning)	Change proposed the TfL Streets Toolkit has also been referenced.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		development - TfL Streets Toolkit should also be used.			
T1/32	T1	Upgrades to main access junctions into the area are required at the beginning of the project.	1	West Twyford Residents Association	No change proposed. The A40 study is a supporting study for the Local Plan and identifies improvements to Hanger Lane, Gypsy Corner and Savoy Circus access junctions. These junction improvements are included in OPDC's Infrastructure Delivery Plan.
T1/33	T1	The Local Plan plan requires a detailed breakdown of street types including minimum street widths, signage, cycleways and footpath widths.	1	West Twyford Residents Association	No change proposed. The key new proposed connections are detailed in the figure accompanying Policy SP7. The walking. cycling, bus and rail networks are provided within the transport chapter. Adoptable roads will need to built to specific standards which includes identification of streetwidths and road safety measures.

Policy T2: Walking

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T2/1	T2	Pedestrians should be required to share space with other road users unless speeds and vehicle numbers are very low.	1	Brent Cyclists	No change proposed. The Healthy Streets approach and sustainable transport hierarchy will be used to inform the design of streets and allocation of space to different modes.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T2/2	T2	Emphasis on walking shows lack of consideration for the elderly.	1	Friary Park Preservation Group	No change proposed. The Healthy Streets approach outlines several key points to address pedestrians, including providing adequate places to rest, safer environments and compliant gradients.
T2/3	T2	Segregate pedestrians from all other forms of transport.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The OPDC Sustainable Hierarchy provides pedestrians with the highest modal priority. OPDC is committed to supporting the delivery of a high quality and safe pedestrian environment which could include segregation of different forms of transport.
T2/4	T2	Apply concept of lifetime neighbourhoods	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy SP2 references the need to support the delivery of lifetime neighbourhoods. This does not need repeating in Policy T2.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T2/5	T2	Connections to surrounding areas is important	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The Local Plan demonstrates the importance of connecting into surrounding areas.
T2/6	T2	Walking is important and walking infrastructure should not be reliant on development proposals.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC will be exploring other ways to deliver walking infrastructure, as identified in Policy DI1, such as working with service providers and bidding for funding.
T2/7	T2	Foot paths should be wide	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. OPDC outlines within T1 and T2 that walking infrastructure should be safe and accessible. All minimum standards for road and pavement width should be met or exceeded.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T2/8	T2	Green routes should be provided	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Along with T2, EU1 and EU2 expand on urban greening and providing green routes through the OPDC area and beyold.
T2/9	T2	Lighting of walking routes	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC will ensure that routes are well lit, but in confirmity with light pollution limits. This would also be identified in the Healthy Streets Indicators.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T2/10	T2	Walking infrastructure map should show the A40 and A406 as walking routes	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The walking figure has been updated to show the walking network.
T2/11	T2	"High quality walking environment" should be further defined.	1	London Borough of Ealing	No change proposed. A 'high quality walking environment' is a reflection of the 10 Healthy Street Indicators and will follow the concepts of this.
T2/12	T2	Should clarify that this is "strategic walking network" and not comprehensive.	1	Transport for London (Group Planning)	No change proposed. The policy outlines OPDC's strategic approach to improving walking infrastructure across development sites. The aspirations set out in this policy are approproate to support the delivery of high quality infrastructure.
T2/13	T2	Walking should be encouraged through improved public transport, public realm and car share facilities.	1	West Twyford Residents Association	No change proposed. All three of these points are proposed within the Local Plan to encourage walking along with a range of additional measures.

Policy T3: Cycling

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T3/1	T3	Greater clarify required on if/how site gradients can be mitigated to make movement easier for cyclists.	1	Brent Cyclists	No change proposed. As indicated in the supporting text to T1, all streets should have a gradient of at least 1:20 to be considered DDA compliant.
T3/2	T3	Do support use of "quietway" and "superhighway" terms for routes.	1	Brent Cyclists	Noted.
T3/3	T3	Proposed cycle network will not achieve connected network or routes, and "quieter routes" reference for all new routes is not appropriate.	1	Brent Cyclists	Change proposed. Reference to quietway and superhighway routes has been removed to ensure it doesn't appear that they are the only routes being developed. OPDC believes the cycle network proposed provides comprehensive cycle coverage for cyclists within the OPDC area and to networks outside of it.
T3/4	T3	Support aim to increase cycling to Park Royal.	1	Brent Cyclists	Noted.
T3/5	T3	London Cycling Design Standards are only cited with respect to cycle parking, but should be applied to all cycle infrastructure.	1	Brent Cyclists	Change proposed. LCDS is now referenced as being applicable to guide all aspects of cycle provision in the OPDC area.
T3/6	T3	Statement that infrastructure should meet LCDS design standards should be included in the Local Plan.	1	Brent Cyclists	Change proposed. LCDS is now referenced as being applicable to guide all aspects of cycle provision in the OPDC area.
T3/7	T3	A statement that infrastructure should meet LCDs design standards for gradient, surface	1	Brent Cyclists	Change proposed. LCDS is now referenced as being applicable to guide all aspects of cycle provision in the OPDC area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		quality and cater for all types of users should be included			
T3/8	T3	Emphasis on cycling shows lack of consideration for the elderly.	1	Friary Park Preservation Group	No change proposed. Walking and sustainable modes of travel are promoted within the transport policies. Quietways and less busy cycle routes are also identified for more vunerable road users.
T3/9	T3	Lack clarity for integrating OPDC's cycle network with surrounding areas, the borough's and TfL's proposals.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Fig. 7.7 outlines routes outside of the OPDC area which existing and proposed cycle routes will feed into.
T3/10	T3	Alternative cycle routes to current busy routes should be provided.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. Fig. 7.7 identifies a range of routes for cyclists to ensure comprehensive coverage and a range of routes for cyclists within the OPDC area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
T3/11	T3	Cycle paths should be wide	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The LCDS will be used to guide all areas of cycling provision including the appropriate widths of cycle paths.
T3/12	T3	Policy will not radically change low take up of cycling in Park Royal	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC believes the combination of infrastructure improvements, business behaviour change programmes and cycle hire schemes will encourage the uptake of cycling.
T3/13	T3	Cycling should be segregated from walking	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The LCDS will be used to guide all areas of cycling provision including where segregation is appropriate.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T3/14	T3	Support segregation of cyclists and pedestrians	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The LCDS will be used to guide all areas of cycling provision including where segregation is appropriate.
T3/15	T3	Need cycle segregation	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. Segregated cycle networks will be proposed where appropriate.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
T3/16	T3	Need a cycle route next to the Chiltern Line	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This would be very challenging to deliver. OPDC has investigated alternative east-west cycle routes, shown in the cycling figure.
T3/17	T3	Policy should ensure adequate secure cycle parking at all destinations.	1	London Borough of Ealing	No change proposed. Policy T3 is in line with the LCDS guidance and T3 e) states that all cycle parking should be secure, convenient and well located.
T3/18	T3	Should include strong requirement for investment in cycling infrastructure, and expand requirement for training to employers.	1	London Borough of Ealing	No change proposed. Behaviour change programmes are encouraged as part of the Infrastructure Delivery Plan.
T3/19	T3	Cycling parking should be covered by CCTV	1	London Borough of Ealing	No change proposed. T3 states that all cycle parking should be secure, convenient and well located.
T3/20	T3	Cycle parking should split across all floors and not just focused at ground level.	1	London Borough of Ealing	No change proposed. T3 encourages developers to plan cycle parking in line with the LCDS

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T3/21	T3	Text should be updated to consider dockless cycle hire.	1	London Borough of Ealing	No change proposed. Dockless hire is covered within "the provision of cycle hire…including from independent providers" T3 f).
T3/22	T3	Supports the provision of comprehensive cycling routes and networks across the OPDC area.	1	London Borough of Hammersmith and Fulham	Noted.
T3/23	T3	The Mayor supports the proposed requirement for cycle parking facilities.	1	Mayor of London	Noted.
T3/24	T3	Support policies for delivery of comprehensive cycle network and end of journey cycle facilities.	1	Park Royal Business Group	Noted.
T3/25	T3	Should come up with a completely revised cycling network and replace figure 7.7.	1	Regents Network	No change proposed. The cycling network presented in the cycling figure provides comprehensive coverage for cyclists and is evidenced by the walking, cycling and public realm study. Aspects such as cycle segregation will be developed as the road network design is progressed.
T3/26	T3	Walking and cycling should be considered as one. The Walking and cycling strategy published alongside the Local Plan does not address how a quietway could work on the Grand Union Canal.	1	Regents Network	No change proposed. Walking and cycling have been considered as one, evidenced by the production of the Walking and Cycling Strategy. The Quietway proposed is an improvement to an existing walking/cycling route along the towpath.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T3/27	T3	The wording in part a) is potential confusing. The wording should be amended to clarify requirements.	1	Transport for London (Group Planning)	Change proposed. OPDC has amended the wording to clarify requirements.
T3/28	T3	Support requirement for cycle parking facilities.	1	Transport for London (Group Planning)	Noted.
T3/29	T3	Wording should be amended to ensure independent cycle hire operations are complementary to TfL Cycle Hire.	1	Transport for London (Group Planning)	No change proposed. OPDC considers that the wording is sufficient to support both TfL Cycle Hire and independent cycle hire operations.
T3/30	T3	Map should also show aspirational improvements for cycle routes, and include the now confirmed Wood Lane to Acton cycle superhighway route.	1	Transport for London (Group Planning)	Change proposed. This now includes aspirational cycle improvements and the cycle superhighway route
T3/31	T3	Cyclists should have dedicated cycle lanes on opposite sides of the road.	1	West Twyford Residents Association	No change proposed. The principles of LCDS will be applied to cycle schemes, which incorporate a number of approaches to segregating cycle traffic from motorised vehicle movement

Policy T4: Parking

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T4/1	T4	Need to recognise parking need for servicing and deliveries	1	ArtWest	No change proposed. Policies SP7, T4 and T7 note the importance of servicing needs
T4/2	T4	Car parking limits are not appropriate in the context of industrial development. Some flexibility is required for commercial car parking.	1	CBRE	No change proposed. Policy T4 indicates that commerical parking in Park Royal will be assessed on a case by case basis. Strong justification for parking will need to be demonstrated by developers.
T4/3	T4	Principle of car free development is supported, but application needs to be considered against practical challenges in extending footpaths to 151 Scrubs Lane.	1	CBRE	Noted. Detail regarding developments will be considered on a case by case basis.
T4/4	T4	0.2 spaces per unit policy will be important in mitigating traffic congestion in the surrounding area.	1	David Craine	Noted.
T4/5	T4	There seems a lack of parking.	1	Friary Park Preservation Group	No change proposed. OPDC is limiting parking to a maximum of 0.2 spaces for residential and zero for non-residential (excluding disabled parking) unless business needs justify otherwise. This is to reduce congestion and encourage a shift to more sustainable modes.
T4/6	T4	Car dependency and congestion in Park Royal cannot be tackled only through controlled parking.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. Controlled parking is not the only way OPDC plans to tackle congestion. Modal shift to more sustainable modes is also important, using new technologies and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	encouraging Car Free development. This is indicated in the transport chapter, SP7 and the Infrastructure Delivery Plan.
T4/7	T4	There is no certainty of implementation given that OPDC is not the highway authority.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC will continue to work closely with the three highway authorities to ensure policies within this plan are realised.
T4/8	T4	Parking and loading should be on site.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender,	No change proposed. Policy T7 outlines that developments should provide off street servicing, where possible.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Jeremy Aspinall, Thomas Dyton	
T4/9	T4	Provision of only 0.2 spaces per new home is very challenging, and may affect successful marketing of housing developments. The OPDC should publish evidence on existing similarly scaled schemes that successfully function with such very low parking standards.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC undertook a Car parking study which is provided as a supporting study to this local plan. The purpose of the study was to provide a critical review of the proposed parking policy in the Local Plan from a market and viability perspective, including a desktop study of precedents. This concluded that 0.2 spaces per residential unit was appropriate.
T4/10	T4	CPZs should target all day parking.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC will work with the local highway authorities to investigate, consult on and implement CPZs.
T4/11	T4	Do not support proposals of West London Line Group for constructing over Little Wormwood Scrubs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. These proposals are not being carried forward by DfT and therefore OPDC is not in a position to include these proposals in the Local Plan

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T4/12	T4, SP5	Alternatives to car use in SIL should be encouraged and provided, and new development in SIL should be car-free.	1	John Cox	No change proposed. This is required through Policy T4, but it recognises that for non-residential development in SIL, this will be challenging and that the appropriate level of car parking should be considered on a case by case basis.
T4/13	T4	There is no policy on blue badge/disabled parking.	1	London Borough of Ealing	No change proposed. Policy T4 requires developers to "securing appropriate blue badge provision for both residential and non residential uses"
T4/14	T4	Potential for parking levies in OPDC should be explored.	1	London Borough of Ealing	No change proposed. OPDC will continue to work with stakeholders to explore the use of tools to reduce private car parking.
T4/15	T4	Car club bays should be 100% electric vehicles	1	London Borough of Ealing	No change proposed. The policy text states that car club bays should be adapted to look at different uses in the future. This includes electric points.
T4/16	T4	All lamp columns should be front of kerb and allow cable charging from the columns	1	London Borough of Ealing	No change proposed. This matter is considered too detailed for inclusion in the Local Plan.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T4/17	T4	Generic terms should be used in stead of Source London.	1	London Borough of Ealing	Change proposed. The Source London reference has been removed.
T4/18	T4	Text should be reordered.	1	London Borough of Ealing	Change proposed. The text has been reordered in line with suggestion.
T4/19	T4	Not clear whether there will there be adequate provision for electric vehicle charging and disabled parking. The Council supports the car provision standards but is keen to ensure there is adequate public transport provision.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC intends to require all parking spaces to have either passive or active provison at a ratio of 80:20. Appropriate blue badge parking will be required for all residential and non residential uses.
T4/20	T4	The Mayor supports approach to car parking and encouraging car free development.	1	Mayor of London	Noted.
T4/21	T4	Support delivery of car club bays and charging points.	1	Park Royal Business Group	Noted.
T4/22	T4	Support overall approach of limiting car parking, and development proposing car parking should provide a Parking Design and Management Plan.	1	Transport for London (Group Planning)	No change proposed. The requirement for a Parking Design and Management Plan would be something that is incorporated into any Delivery and Servicing Plan or Design and Access Statement.
T4/23	T4	Approach to promoting modal shift is welcome, and be referenced in strategic policies.	1	Transport for London (Group Planning)	No Change proposed. This is already explained within SP7.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T4/24	T4	Support policy for provision of electric car parking spaces.	1	Transport for London (Group Planning)	Noted.
T4/25	T4	Amend text to include reference to TfL.	1	Transport for London (Group Planning)	Change proposed. OPDC has amended the text to include TfL.
T4/26	T4	TfL sees the OPDC area as a potential location for a new coach facility and would like to work with OPDC to investigate further.	1	Transport for London (Group Planning)	No change proposed. OPDC will work with TfL to investigate this potential. However, OPDC does not consider it appropriate to allocate land for a coach station at this time as feasibility work is underway exploring other locations across London. Coach parking requirements are dealt with in the round in Policy T4.
T4/27	T4	Parking needs to be accessible to discourage the current congestion issues.	1	West Twyford Residents Association	No Change. Congestion is being addressed by reducing car dependeny. This is achieved by capping car ownership and developing car sharing schemes to restrict the on-street demand for long-stay and short-stay parking. OPDC is limiting parking to a maximum of 0.2 spaces for reisdential and zero for non-residential (excluding disabled parking) unless business needs justify otherwise. This is to reduce congestion and encourage a shift to more sustainable modes.

Policy T5: Rail

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T5/1	T5	Need to ensure taxis and cars dropping off at stations do not impact on cycling infrastructure	1	Brent Cyclists	Noted. OPDC will work with TfL, Network Rail, HS2 Ltd and the local authorities to ensure there are adequate facilities for taxi ranking and that these do not impede cyclists. Private vehicle drop offs are strongly discouraged as detailed in Policy T5.
T5/2	T5	Strongly support rail proposals, and suggest considering opening West Coast Main Line platform at Willesden Junction.	1	David Craine	Noted.
T5/3	T5	Lack of commited funding for HS2 is a problem.	1	Friary Park Preservation Group	No change proposed. HS2 Ltd now has royal assent so has committed funding
T5/4	T5	This policy is not effective. Focusing Old Oak development on the HS2 Station as a destination is not good place-making; it is simply one component of the area. In particular policy clauses e) & h) have consequences for and pre-empt proper place-making and lack clarity on the implications for the design solutions for stations. Old Oak Common Station and its context should not be predetermined by clause h).	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This policy does not solely focus on the HS2 station. OPDC does not consider that points e) and h) would compromise place-making. In addition to applying these policies, all other relevant policies in the Local Plan, other development plan documents and other material planning considerations would need to be considered in forming a view on the acceptability of a proposal.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T5/5	T5	Policy should be more specific about how effective interchange in stations will be achieved and should reference particular stations where this will be sought.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The exact way in which interchange will be achieved will need to be considered on a case by case basis and assessed against all relevant planning policy and material considerations. Specific stations are dealt with in the places chapter.
T5/6	T5	Protect the potential for Willesden Junction to have a greater local/west London role with more platforms.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The policy supports the potential delivery of new platforms on the West Coast Main Line. Additional platforms on other lines would be a considerably challenging and is not currently proposed by either Network Rail or TfL, so it is not appropriate for the Local Plan to safeguard for the provision of this.
T5/7	T5	This policy, and indeed the Old Oak South proposals, lack flexibility, given that the strategic transport hub, which as explained in Policy SP1 forms the ‘catalyst for growth’,	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. OPDC is working closely with DfT and HS2 Ltd to ensure the station proposals meet the aspirations indicated within the Local Plan. Requirements associated with Old Oak Common station are dealt with in Policy P1C1.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		is dependent on a project largely beyond the ability of the OPDC to control.		Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T5/8	T5	Old Oak Common Station should be recognised for what it is, an interchange, and, therefore, its primary function and facilities should be to provide for convenient train to train changes by travellers, and to cater for commuters, residents and visitors to Old Oak.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC believes the Local Plan makes it clear that the station is an important interchange providing access to travellers and catering for commuters, residents and visitors.
T5/9	T5	Vehicular access to the station will be restricted by local traffic	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The station will be primarily served by buses, taxis, cyclists and pedestrians with a limited kiss-and-ride facility currently proposed. OPDC hopes that the highest share of people using the station will travel by sustainable modes: pedestrians, cyclists and buses and is working positively with DfT, HS2 Ltd and TfL to achieve this.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T5/10	T5	Station improvements are dependent on development proposals. North Acton needs upgrading now.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is working with TfL and LB Ealing to develop the proposals for North Acton station. The North Acton station study identified shorter term proposals. This study is a supporting study to the Local Plan. Requirements for North Acton station are dealt with in Policy P7 and P7C1.
T5/11	T5	The relationship of railways with new or more frequent services with neighbouring properties should be carefully considered and any unavoidable adverse environmental impact should be remedied.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC will work with delivery bodies of stations, such as TfL, and work to ensure the interaction with neighbouring properties is carefully considered. Proposals would need to accord with all relevant planning policy, which includes giving consideration to amenity issues such as noise, vibration and visual impact.
T5/12	T5	Policy should not focus on Old Oak Common Station as the primary destination in the area.	1	John Cox	No change proposed. The policies are equally balanced in reference to existing and new stations.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T5/13	T5	There is a need to relate new stations to the services and destinations that they serve.	1	John Cox	No change proposed. The figure shows the destinations served by lines in the area. Decisions over services and destinations served by railways are made be the relevant rail authority.
T5/14	T5	Proposed new stations and station upgrades should be specifically referenced to ensure delivery.	1	John Cox	No change proposed. The spatial elements of station improvements are covered in the place policies.
T5/15	T5	There is a need to protect existing operational railway land.	1	John Cox	No change proposed. Operational railway land benefits from protection outside of the planning regime, where it warrants appropriate protection. OPDC will engage with Network Rail and other relevant rail bodies to understand these operational requirements
T5/16	T5	Fully support policy to ensure routes and spaces within stations are integral parts of local street frontage.	1	London Borough of Ealing	Noted.
T5/17	T5	Typo. Pioneer misspelt.	1	London Borough of Hammersmith and Fulham	Change proposed.
T5/18	T5, para 7.37	Typo. 'Include' should be replaced with 'are'.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the current wording to be appropriate.
T5/19	T5	Proposed overground station at Hythe Road and Old Oak Common Lane should be referred to as "potential" new	1	Mayor of London	Change proposed to ensure stations are referred to as potential

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		stations throughout the document.			
T5/20	T5	Joint work is ongoing to examine upgrades are needed at existing stations and rail services.	1	Mayor of London	Noted.
T5/21	T5	Any long term plans for redevelopment affecting operational rail facilities will need to take account of future operational need.	1	Mayor of London	Noted.
T5/22	T5	The rail policy does not set out where stations are proposed or provide a strategic context for rail. Reference should be made to Kensal Canalside station and to an additional Overground station at Westway Circus	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed.The rail figure indicates the rail connections and stations that will be available to serve the development area. This has been changed to show existing and potential rail stations and services. Figure 7.14 shows the bus network which will serve the area.
T5/23	T5	Show potential Kensal Canalside Elizabeth Line Station	1	Royal Borough of Kensington and Chelsea	No change proposed. The station is outside of the OPDC area is not yet committed so it is not appropriate to include this within OPDC's Local Plan. Reference is made to the potential for a station in the supporting text to policy SP1.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T5/24	T5	Should clarify what rail and bus service improvements were assumed when assessing future PTALs.	1	Transport for London (Group Planning)	No change proposed. The Local Plan indicates that the figure shows potential future PTAL levels in the OPDC area when all of the transport infrastructure detailed within the local plan has been delivered."
T5/25	T5	Clarification text required on potential new stations and station improvement works indicating that the business case and capacity study is still outstanding	1	Transport for London (Group Planning)	No change proposed. OPDC has indicated the stations are potential. If the outcome of the business work changes this will be amended.
T5/26	T5	Annotation should make a distinction between existing and potential/future rail infrastructure.	1	Transport for London (Group Planning)	Change proposed. The figure has been amended to show existing and future rail infrastructure
T5/27	T5	Elizabeth Line spur is not a TfL priority and should not be included in the Local Plan	1	Transport for London (Group Planning)	Change proposed. This has been removed from the rail policy.
T5/28	T5	References to "station squares" should be amended to allow greater flexibility in the design of these spaces.	2	Transport for London (Group Planning) and Mayor of London	Change proposed. Text has been amended to say station squares and public realm
T5/29	T5	Concerns that making development car free will penalise elderly, disabled and larger families.	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. Car free development will be supported with high quality walking and cycling environments and a coherent and comprehensive bus network to ensure the transport network in Old Oak and Park Royal is accessible to all.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T5/30	T5	Support the policy	1	West London Line Group	Noted. No change proposed.
T5/31	T5	Refer to GTR/Southern East Croydon – Milton Keynes service Refer to HS2-WLL link and raft Refer to Westway Circus Overground Station	1	West London Line Group	No change proposed. The Westway Circus Overground station in not within the OPDC boundary. The other proposals are not committed or supported by relevant transport bodies.
T5/32	T5	Agree with submission of West London Line Group, and add that connectivity between different stations doesn't look good.	1	West Twyford Residents Association	No change proposed. These proposals are not being carried forward by DfT and therefore OPDC is not in a position to include these proposals in the Local Plan
T5/33	T5	Concern that Crossrail may not have capacity to accommodate passenger numbers at Old Oak Common Station.	1	West Twyford Residents Association	No change proposed. OPDC will work with HS2 Ltd and DfT to ensure the station meets the aspirations set out in the Local Plan.

Policy T6: Buses

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T6/1	T6	Lack of information on new bus routes.	1	Friary Park Preservation Group	No change proposed. The Bus Strategy supporting study indicates how buses would serve Old Oak and Park Royal is provided as a supporting study to the local plan.
T6/2	T6	This policy is not effective. It is inadequate to proactively support bus development in a planned and coherent way, on a road network that should facilitate optimum routing, particularly between Park Royal and Old Oak/HS2 Station. This should be made explicit in policy. It is dependent on individual developments coming forward, and this is reflected in the likely indeterminate consequences arising from clause c).	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC believes the policies are effective to promote the delivery of a coordinated and coherent bus network.
T6/3	T6	Bus stop locations should be coordianted with station interchanges	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Bus stops will be provided at regular intervals to ensure the network is comprehensive and accessible to all. This includes adequate bus stops at station interchanges so that passengers have a seamless journey from rail to bus.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T6/4	T6	Bus services serving the wider area from Old Oak and Park Royal need investigating.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC has worked closely with TfL to understand the requirements of bus routes serving Old Oak and Park Royal. One of the pieces of information used is bus reliability data across the routes. This identifies where bus reliability is impacted outside the Old Oak and Park Royal boundary. OPDC will work with TfL and the London Boroughs to ensure routes serving Old Oak and Park Royal are operating reliably.
T6/5	T6	Figure 7.14 should show new bus routes and there are no routes shown to Old Oak Common station.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The figure shows existing routes and roads that may form part of a future bus network, subject to funding and consultation. This includes routes to the Old Oak Common station.
T6/6	T6	Paras 7.44 and 7.48 repeat themselves.	1	London Borough of Ealing	Change proposed. The text has been reduced to avoid duplication
T6/7	T6	This should acknowledge the need for segregated cycle lanes on bus corridors	1	London Borough of Ealing	No change proposed. The LCDS will be used to guide all areas of cycling provision including where segregation is appropriate.
T6/8	T6, Para 7.44	Suggestion to delete 'more'	1	London Borough of Hammersmith and Fulham	Change proposed.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T6/9	T6, Para 7.49	“Green” bus provision paragraph needs to be stronger.	1	London Borough of Hammersmith and Fulham	Noted. No change proposed. OPDC considers the current paragraph to be strong enough and effective enough to support the roll out of green buses.
T6/10	T6	Long term plans for the bus network should be in line with OPDC Bus Strategy, and OPDC should work with TfL to help develop and interim phasing bus strategy.	1	Mayor of London	Noted. OPDC will liaise and work with TfL on future bus strategies. Refeences to the bust strategy have been added to the supporting text.
T6/11	T6	Further study required to understand existing/potential employee bus users in Park Royal.	1	Park Royal Business Group	No change proposed. Work has been undertaken on this as part of the Park Royal Transport Study. OPDC considers the level of detail in this is sufficient for the Local Plan.
T6/12	T6	Show potential bus link to Ladbroke Grove	1	Royal Borough of Kensington and Chelsea	Change proposed. The potential link to be shown in the bus map.
T6/13	T6	Section should state that plan for the future bus network in the area should be developed in line with Bus Strategy for OPDC.	1	Transport for London (Group Planning)	Change proposed. Reference to the bus strategy has been included. The bus network will need to be developed in a phased approach.
T6/14	T6	Policy T6a) should read ‘facilitate, deliver and contribute to bus network and infrastructure, including …’	1	Transport for London (Group Planning)	Change proposed. Policy text has been updated as per TfL's suggestion.
T6/15	T6	Bus lanes are required to support a strong bus network. Concerns that existing roads will not have enough road space.	1	West Twyford Residents Association	No change proposed. OPDC are committed to facilitating and delivering appropriate bus infrastructure, as set out in Policy T6 and in the Infrastructure Delivery Plan along with necessary road improvements if required.

Policy T7: Freight, Servicing and Deliveries

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T7/1	T7	Support policy.	1	ArtWest	Noted.
T7/2	T7	Part a) iii) of the draft Policy encourages the use of freight consolidation centres where appropriate. Request that the spatial coverage of the Policy is clarified. It is unclear where these centres might be located, how they are expected to be delivered, how they are intended to operate etc. More detail is required including relevant evidence	1	CBRE	No change proposed. The policy encourages developers to use freight consolidation centres where appropriate to reduce construction vehicle trips on the road network. Developers will need to demonstrate that they have investigated the potential to use freight consolidation centres to mitigate construction activity.
T7/3	T7	Support the reference to the last mile service. Suggest that the principle of last mile deliveries is given even greater support and visibility within the Plan, given that this is a core function of Park Royal, both locally and strategically.	1	CBRE	No change proposed. The text supports the use of last mile servicing. OPDC considers the level of support for this is appropriate within the plan. OPDC will work with businesses to understand how last mile deliveries could be implemented.
T7/4	T7	This policy is not effective. The policy should be more emphatic on planning for and the provision of consolidation centres to transfer loads to smaller 'last mile' vehicles with controls on access by HGVs; together with a	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. Developers are required to show evidence within their Construction Logistic Plan of their investigations to reduce trips generated by their construction activity. This includes investigating the use of consolidation centres.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		proactive plan to improve Park Royal's transport and traffic operations.		Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T7/5	T7	Policy T7 d): substitute 'canal' for "water".	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This policy relates to use of the Grand Union Canal.
T7/6	T7	The promotion of rail and canal for freight should be an integral part of this policy and rail links/heads and wharfs should be protected and enhanced.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This is covered wthin T7d: Maximise the use of more efficient and sustainable ways of delivering goods including consolidation, the use of rail, water (to be changed to the canal), electric vehicles, cargo bikes and last mile deliveries by sustainable modes.
T7/7	T7	The Plan should positively plan for Park Royal to resolve, among other things, the transport issues, many of which are related to	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The Park Royal Transport Strategy identifies a range of transport interventions to mitigate traffic, servicing and environmental issues. These are

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		servicing and deliveries, but will not be dealt with through development proposals. A clear signpost in this policy, connected with Place Policies on Park Royal, should bring forward a management programme to resolve prevailing traffic, servicing and environmental issues.		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	detailed in the Park Royal place policies and the IDP.
T7/8	T7	There should be a clear policy on loading specifying it is off street.	1	London Borough of Ealing	No change proposed, securing servicing that is off street is indicated in T7)b.
T7/9	T7	Support proposal for consolidation centres, but should require final delivery to be made using ULEVs.	1	London Borough of Ealing	No change proposed. T7 d) seeks to maximise the use of more efficient and sustainable ways of delivering goods including consolidation, the use of rail, water, electrc vehicles, cargo bikes and last mile deliveries by sustainable modes.
T7/10	T7	The Local Plan should support the potential delivery of a coach station to serve wider than local needs.	1	Transport for London (Commercial Development)	No change proposed. Policy T4 supports the provision of coach parking. A larger facility would need to be assessed against this and other relevant policies in the Local Plan.
T7/11	T7	Section should include good examples of construction best practice eg high quality hoarding/wayfinding, site manager contact information.	1	Transport for London (Group Planning)	No Change proposed. This is indicated within the supporting study.
T7/12	T7	OPDC should examine the New York freight lorry system, restricting access to the City after 6.00am	1	West Twyford Residents Association	No change proposed. OPDC requests that developers use the Construction Logistics Planning guidance produced by TfL. This includes a section about retiming deliveries to avoid the peak traffic periods. OPDC will work

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					with businesses, TfL and the local authorities to investigate the opportunities for minimising freight vehicle movements.

Policy T8: Construction

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
T8/1	T8	Policy is sound (no justification provided)	1	Friary Park Preservation Group	Noted.
T8/2	T8	Promotion of use of rail and canal supported.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
T8/3	T8	Construction Logistics Plan/Code of Practice need to be monitored and periodically revisited (to ensure that they are fit for purpose over time). Reinstate FORS to gold standard.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. The Construction Logistics Plans will be monitored and revisited. TfL have indicated that FORS silver standard is the minimum standard construction companies should have to achieve.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T8/4	T8	Refer to VNEB as a precedent for modelling construction	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC does not consider it appropriate to reference this as a precedent as this work was undertaken to support the Opportunity Area Planning Framework, rather than being something undertaken by developers. OPDC has commissioned its own Construction and Logistics Strategy and tools from this will be made available on OPDC's website.
T8/5	T8	There should be meaningful and effective community involvement in the preparation of an OPDC/TfL's Construction Logistics Strategy and development CLP/CofPs.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Developers will be required to follow the recognised, best practice TfL guidance for the development of CLPs. The Construction and Logistics Strategy will investigate options for reducing vehicle movements generated by construction.
T8/6	T8	The Strategy, Plan and Code should include: the management of construction phasing so that particular areas are not building sites over	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. The strategy will be looking at the management of construction phasing to ensure construction activity is coordinated to minimise the impact. This is indicated in the supporting text of T8.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		prolonged periods of time and/or intensity		Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
T8/7	T8	Developments should follow Considerate Contractor Schemes; these should include good communication with the community to help minimise inconvenience;	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The supporting text highlights the requirement for developers to sign up to the considerate constructors scheme.
T8/8	T8	Should support prefabrication of buildings	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The construction methodology for the developments will be detailed within the CLPs which will be reviewed by OPDC to ensure it is the most appropriate methodology. Advanced construction methods are supported in Policy SP2.
T8/9	T8	A development's Construction Logistics Plan and Construction	13	Grand Union Alliance, Wells House Road	Noted. OPDC requires developers to submit a CLP as part of the planning

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Code may be required to provide mitigation and prevention measures that extend beyond the actual construction site.		Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	submission which will explore the impact of the construction activity and routings which will in some cases fall outside the boundary of the site.
T8/10	T8	Should use rail and canal for transportation of construction material	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC identify the need for developers to explore opportunities to tranpsort construction material by rail or via the Grand Union Canal
T8/11	T8	Preferred routes for construction traffic should minimise impact on existing residents.	1	London Borough of Ealing	Noted. Developers will be required to provide forecast trip generation to OPDC so impacts on local residents can be minimised.
T8/12	T8	Wording should refer to Construction Logistic Plans (CLPs) to be consistent with TfL guidance.	1	Transport for London (Group Planning)	Change proposed. Text refers to CLPs and recommends that developers use this helpful guidance.
T8/13	T8	Holding areas required for construction projects.	1	West Twyford Residents Association	No change proposed. OPDC requests that developers use the Construction Logistics

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Planning guidance produced by TfL. This includes advice regarding using lorry holding areas to reduce the propensity for construction vehicles to circle around on local roads waiting to unload or pick up construction materials. OPDC will work with developers, TfL and the local authorities to investigate the opportunities for minimising construction vehicle movements.

8. Housing

Policy H1: Housing Supply

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H1/1	H1	Encourage the OPDC to work with partners to drive early delivery of new housing.	2	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	Noted. The Delivery and Implementation Chapter 11 details how as a proactive planning authority OPDC will work to ensure the timely delivery of new housing supply.
H1/2	H1	The annual homes target identified in the Plan is below that required in Annex 1 of the (2015) London Plan, but it is acknowledged that overall capacity identified in the London Plan will be exceeded in the longer term.	1	Greater London Authority	Change proposed. Policy H1 and the supporting text has been amended to clarify that OPDC is committed to supporting the delivery of the ten-year net housing delivery targets for the OPDC area, as set out in the most up-to-date London Plan.
H1/3	H1	TfL has requested that references to the Elizabeth line depot site coming forward for development during the Local Plan period be removed as any redevelopment proposals will only come forward in the longer term and will still be required to provide for operational purposes. The removal of this site will not affect OPDC's ability to deliver its housing numbers within the short term (0-10 years) as this site has been	1	Greater London Authority	Change proposed. The Elizabeth Line depot is no longer identified as coming forward within the Local Plan period.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		identified in the London SHLAA as delivering homes in 10-20 years and is proposed for mainly commercial rather than residential development.			
H1/4	H1	Supports the level of housing proposed as it is positively prepared and justified based on proportionate evidence. The additional housing within the OPDC boundary will help meet the needs of the wider immediate area and across London.	1	Royal Borough of Kensington and Chelsea	Noted.
H1/5	H1	The host borough should receive 100% of the affordable housing nominations for homes in its boundaries.	1	London Borough of Hammersmith and Fulham	No change proposed. This is not an issue for the Local Plan. OPDC has agreed an affordable housing nominations policy with the London Boroughs of Brent, Ealing and Hammersmith & Fulham.
H1/6	H1	No information provided on funding for new homes.	1	Friary Park Preservation Group	No change proposed. Actual affordable housing delivered through planning applications will need to be carefully balanced between infrastructure requirements, the overall amount of affordable housing and the availability of grant funding OPDC will work with developers, Registered Providers and the GLA to secure funding for new affordable homes and also funding for infrastructure.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H1/7	H1	The target for 24,000 homes has not been "objectively assessed".	19	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Midland Terrace Residents, Nye Jones, Nicky Guymer, Bruce Stevenson, Dave Turner, Mark Walker of TITRA, Oonagh Heron	No change proposed. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF. Based on this approach, and the area's current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). The Development Capacity Study identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively assessed housing needs within OPDC's red line boundary will be met in full. However, the development will also help to meet wider housing needs in the London Boroughs of Brent, Ealing and Hammersmith & Fulham and strategic London-wide housing need. The Development Capacity Study (DCS) fulfils the role of a Housing and Economic Land

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Availability Assessment and officers are satisfied that this has been completed in accordance with PPG. The DCS has identified sites and broad locations and assessed their development potential as is required under the NPPF.
H1/8	H1	The impact of Brexit on migration should be inform a revision of housing needs figures.	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. At the time of writing, formal negotiations regarding Britain's future relationship with the EU have yet to reach agreement on the rules governing the movement of people between Britain and countries within the EU, as well as the rights of British and EU citizens already living abroad. The outcome of these negotiations has the potential to dramatically influence future patterns of migration. It is possible to explore some hypothetical scenarios for the country as a whole, assuming a range of future migration flows between the UK and Europe, but the uncertainties are far greater when considering the impact on individual regions or local authorities. As well as uncertainty about the overall level of international migration, there are further questions about how the distribution of those migration flows between UK regions might change and what the knock-on effects on domestic migration might be. At the current time, it therefore does not seem appropriate to attempt to attempt to explicitly account for

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the referendum result in the projections. The value of making speculative assumptions about the final outcome and its repercussions seems limited. More valuable is to ensure that the underlying assumptions for the projections are transparent so that they provide a suitable basis for additional analysis. This is something that will be drawn out in future versions of the Local Plan.
H1/9	H1	OPDC should explore the concepts of self build housing in industrial areas.	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy H1 commits OPDC to support applications for self-build and custom build where these accord with other Local Plan policies. Responsibility under the Self-Build and Custom Housebuilding Act does not fall to Mayoral Development Corporations. However, OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to ensure that the area is meeting the need of people registering a wish to build their own home. Residential development is not a SIL compliant use.
H1/10	H1	There has been no assessment of whether the area's roads and infrastructure can cope with large-scale regeneration.	17	Nicky Guymer, Bruce Stevenson, Dave Turner, Mark Walker of TITRA, Oonagh Heron, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. The Old Oak Strategic Transport Strategy and the Park Royal Transport Strategy tested the impact of development on the highway and public transport network. It identifies a significant number of infrastructure requirements to support the regeneration of the core development area in Old Oak and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	requirements for Park Royal. The Infrastructure Delivery Plan (IDP) also forms part of the evidence base for the Local Plan and includes the interventions identified in the strategies. The IDP identifies the key pieces of infrastructure which OPDC would look to secure through developer contributions (Section 106, Section 278 or Community Infrastructure Levy).
H1/11	H1	Support opportunities to build new social housing on publicly owned land and options to deter foreign and buy-to-let investment.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
H1/12	H1	The housing supply policy is not positively prepared or justified. Question both the overall provision and the effect on the quality of housing that will be produced to achieve those targets.	14	Hammersmith Society,Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. Old Oak and Park Royal are identified as Opportunity Areas with the capacity to deliver 25,500 homes, Opportunity Areas are the capital's most significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. The housing targets in OPDC's

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Local Plan are based on the Development Capacity Study which identified the actual capacity for new homes in the area based on the requirements of a Housing and Economic Land Availability Assessment, as required by the Planning Practice Guidance. As set out in the Housing Evidence Statement, the Strategic Housing Market Assessment (SHMA) considered the objectively assessed housing need within the land within the Old Oak and Park Royal red line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need and in accordance with the NPPF. Based on this approach, and the area's current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). Given the overall quantum of homes to be delivered (approx. 20,000 over the Local Plan period), the objectively assessed housing needs within OPDC's red line boundary will be met in full. However, in accordance with London Plan policy as Opportunity Areas Old Oak and Park Royal will also help to meet wider housing needs in the London Boroughs of Brent, Ealing and Hammersmith & Fulham and strategic London-wide housing need.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H1/13	H1, para 8.13	The requirement to market homes to Londoners is not effective as the policy and supporting text do not set out how this will be achieved.	14	Hammersmith Society, Old Oak Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. As set out in H1, OPDC will work with the GLA and developers to ensure that wherever possible homes are marketed to and occupied by people who live and work in London. As set out in the draft London Housing Strategy and draft London Plan 2017, the Mayor of London aims to ensure that Londoners have an opportunity to purchase new homes before they are marketed overseas – particularly those homes that ordinary Londoners are more likely to be able to afford. The Mayor is discussing with major homebuilders steps to make more new homes available to Londoners before anyone else. OPDC will work with the Mayor to implement this.
H1/14	H1, para 8.14	Support policy to monitor housing delivery.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
H1/15	H1	Alternatives should have been explored for the appropriate housing market	13	Wells House Road Residents Association, Joanna Betts, Nadia	No change proposed. The Local Plan has is required to be in general conformity with the London Plan. This sets out that Old Oak and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		area. The London Plan homes target for Old Oak should not be used as justification for OPDC's target.		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Old Oak Interim Neighbourhood Forum	Park Royal are Opportunity Areas and that Opportunity Areas are key engines for growth in the city. OPDC has undertaken a Development Capacity Study in accordance with Planning Practice Guidance which has identified sites and broad locations and assessed their development potential as is required under the NPPF. OPDC has also undertaken a Strategic Housing Market Assessment to identify the objectively assessed housing need within the land within the Old Oak and Park Royal red line boundary in accordance with the NPPF. Based on this approach, and the area's current population of 7,000 people and 2,800 households, there is an objectively assessed need for 1,200 new homes over the Local Plan period (2018 to 2038). Recognising the value of the Opportunity areas to contribute towards meeting wider need, OPDC can also help meet housing needs in the London Boroughs of Brent, Ealing and Hammersmith & Fulham and also help meet city-wide need.
H1/16	H1	The Plan should have a policy for self-build and custom build and identification of sites.	13	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. Policy H1 commits OPDC to support applications for self-build and custom build where these accord with other Local Plan policies. The responsibility to plan for the needs of people who want to build their home does not fall to MDC's. However, OPDC will work with local

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	authorities to ensure that the area is meeting the needs of people who wish to build their own home.
H1/17	H1	Policy is not justified because it makes ambitious assumptions about the speed of market housing absorption.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. As set out in the Market Absorption Study the delivery rates in other large regeneration schemes have been assessed. Given the scale of the site, the research concludes that there are multiple markets within Old Oak and Park Royal and therefore promotes an average delivery rate of up to 700 private homes a year. The research also finds that homes for rent (affordable and market) do not compete with private homes for sale as they are targeted at different markets and can increase the overall number of homes delivered on the site.
H1/18	H1	The reference to 'windfall housing' sites should be extended to take a serious look at the potential development on small sites, including above retail premises.	1	Harlesden Lets	No change proposed. OPDC will work with developers to identify windfall sites in the area for delivery of housing. The draft London Plan 2017 provides OPDC with a target to deliver 60 homes a year in this way over the next 10 years.
H1/19	H1	Should be a policy on bespoke housing solutions to maximise the use of difficult sites.	1	Harlesden Lets	No change proposed. It is not clear what bespoke housing solutions merit an additional policy in the Local Plan.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H1/20	H1	Arrangements should be made to provide additional housing in Harlesden.	1	Harlesden Lets	No change proposed. Most of Harlesden lies just outside of OPDC's boundaries. However, OPDC will work with Brent Council and Harlesden Neighbourhood Forum, to provide homes within the red-line boundary to meet housing needs in Harlesden.
H1/21	H1	Concern that the reduced number of homes on the Old Oak Park development will be directed to other sites by OPDC to achieve its housing target.	14	Midland Terrace Residents, TITRA, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The development capacity of sites within the Old Oak Park area is defined using the methodology set out in OPDC's Development Capacity Study which is defined in the National Planning Practice Guidance. This considers relevant existing development scheme precedents to inform density levels and therefore capacity. As such, the capacity for sites in the Old Oak Park area within OPDC's DCS and Local Plan are not reliant on capacity shown in the emerging Old Oak Park proposals.

Policy H2: Affordable Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H2/1	H2	Concerns about the affordability of intermediate housing products and whether they will be affordable to local people.	17	London Borough of Hammersmith and Fulham, Harlesden Neighbourhood Forum; Harlesden Lets, Grand Union Alliance, Robert	No change proposed. OPDC has set the policy in accordance with the Mayor of London's preferred tenures as set out in the Affordable Housing & Viability SPG and Draft London Plan 2017. London Living Rent and Shared Ownership are the Mayor of London's

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Cowell, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	preferred intermediate housing products and meet the requirements in the National Planning Policy Framework and income limits in the draft London Plan. Policy H2 sets an additional safeguard that units must be provided that are affordable to households on average incomes in the local authority area.
H2/2	H2	The tenure split in Policy H2 does not reflect objectively assessed need as identified in the OPDC SHMA which forecasts a 86% need for London Affordable Rent. The proposed tenure split should be changed to 60% London Affordable Rent and 40% Intermediate housing (including London Living Rent and London Shared Ownership) to accord with current London Plan Policy 3.11 .	20	Brent Council, Ealing Council, Hammersmith & Fulham Council, Harlesden Neighbourhood Forum; Harlesden Lets, Old Oak Interim Neighbourhood Forum, Grand Union Alliance, Crisis Brent, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The current London Plan contains an affordable housing target split of 60% social/ affordable rent and 40% Intermediate housing; subject to viability, local housing needs and promoting mixed and balanced communities. However, the draft London Plan 2017 contains a target split as follows: 30% low cost rented homes (social rent); 30% intermediate products (London Living Rent and Shared Ownership); and 40% to be determined by the local planning authority (LPA) based on identified need, provided they are consistent with the definition of affordable housing in the NPPF. The proposed tenure split is considered to be positively prepared; justified; effective; and consistent with London and national policy on the following grounds. The NPPF states that LPAs should set out the strategic priorities for their area which should include strategic

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					policies to deliver (amongst others) "the homes and jobs needed in the area". In accordance with the NPPF and existing planning guidance based on a current population of 7,000 people and 2,800 households, the SHMA identifies an objectively assessed need (OAN) for 1,200 new homes over the Local Plan period (2018 to 2038). The SHMA has identified an 86% need for London Affordable Rent. Whilst the policy is not directly corresponding in percentage terms, the OAN in terms of tenure split will likely be achieved due to over delivery of housing above the OAN as demonstrated by the Development Capacity Study (2017); which demonstrates that 20,000 homes can be delivered in the local area during the Local Plan period to help meet a wider need across the London Boroughs of Brent, Ealing and Hammersmith & Fulham. The draft London Plan 2017 sets a strategic target that 50% of all new homes in London should be affordable. An Affordable Housing Viability Assessment (2017) has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure split: 70% London Affordable Rent/30% Intermediate; 43% London Affordable Rent/57% Intermediate; 30%

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					London Affordable Rent/70% Intermediate. This concluded that: 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing; 30% London Affordable Rent/70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. As such, reasonable alternatives to the chosen affordable housing tenure split have been considered. The affordable housing tenure split that has been chosen has been selected because it is a viable option when compared against other reasonable alternatives which would not be viable. As such its selection ensures the Local Plan is deliverable over its period. In addition, the affordable housing tenure split that has been chosen accords with the policies of the Draft London Plan 2017 and the NPPF.
H2/3	H2	Support delivery of 50% affordable housing, subject to viability, and proposals for OPDC to function as the owner and developer of public land holdings within Old Oak, which potentially allow it a much	1	Ealing Council	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		wider range of tools to deliver new affordable housing.			
H2/4	H2	Welcome the fact that the OPDC Local Plan acknowledges that lack of new housing supply at genuinely affordable levels is a driver of increased levels of homelessness. However, OPDC could do more to maximise the supply of new homes that local people can afford, in particular the homeless.	1	Crisis Brent	No change proposed. The Local Plan is required to be in general conformity with the London Plan. The Draft London Plan 2017 sets a 50% affordable housing target for public sector land, Strategic industrial Location and, Locally Significant Industrial Sites deemed appropriate for alternative use. OPDC will deliver the Mayor's affordable housing tenures in conformity with Mayoral policy which are London Affordable Rent, London Living Rent and London Shared Ownership. These are defined in policy H2 and table 8.2.
H2/5	H2	Plan should specifically include the 35% (without public subsidy) and 50% (public land) thresholds set out in the Affordable Housing & Viability SPG.	1	Greater London Authority	Change proposed. Policy H2 now refers to the most up-to-date Mayoral policy and/or guidance on viability and thresholds. The supporting wording has been expanded to refer to the current applicable thresholds but these have not been directly quoted in the policy wording because the 35% threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance as set out in the draft London Plan 2017.
H2/6	H2	The reference to starting negotiations with a 50% affordable housing target (para 8.16) does not fully accord with	1	Greater London Authority	Change proposed. Policy H2 now refers to the most up-to-date Mayoral policy and/or guidance on viability and thresholds.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		approach set out in Mayor's Housing SPG. Especially as, later in the supporting text, the 50% requirement is open to negotiation and does not provide the certainty or clarity needed to influence land values. The presence of abnormal site constraints would be expected to impact land values and the cost should not necessarily be born through a reduction in planning obligations.			
H2/7	H2	The 50% housing target is very ambitious and unrealistic on private land. It would be better for the policy to require schemes to provide different targets for private and public land.		Old Oak Park Limited	No change proposed. The Local Plan is required to be in general conformity with the London Plan. The Draft London Plan 2017 sets an overall strategic 50% affordable housing target and a 50% target specifically for public sector land, Strategic industrial Location and, Locally Significant Industrial Sites deemed appropriate for alternative use. However, it is recognised in the supporting text that the actual level of affordable housing that is delivered through planning applications will have to be carefully balanced between infrastructure requirements, different tenure types and any public sector support that may be secured. Individual viability assessments will determine the actual

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					amount of affordable housing that can reasonably secured.
H2/8	H2	Support for approach outlined in OPDC's Strategic Housing Market Assessment.	1	Royal Borough of Kensington and Chelsea	Noted.
H2/9	H2	Support for the level of housing provision planned for. It is also noted that the OAN for the OPDC redline boundary area is identified as 1,200 homes over the plan period up to 2037. Therefore, the development being planned for will be significant in meeting wider needs.	1	Royal Borough of Kensington and Chelsea	Noted.
H2/10	H2	Supports the measures proposed in Policy H2 to increase the provision of affordable housing to meet local and wider need.	1	Royal Borough of Kensington and Chelsea	Noted.
H2/11	H2	There should be tenure mix flexibility as outlined in the SPG (30% LAR. 40% Intermediate, 40% flexible) to allow the Council to adopt the shared equity model as the alternative affordable housing product.	1	London Borough of Hammersmith and Fulham	No change proposed. The proposed tenure split (30% London Affordable Rent, 70% Intermediate) is compliant with the tenure requirements set out in the Mayor of London's Affordable Housing & Viability SPG. The Intermediate housing mix may include Shared Equity where it meets the requirements of the NPPF.
H2/12	H2, para 8.2	No clear explanation of the term "affordable homes".	1	Friary Park Preservation Group	No change proposed. Table 8.2 provides a definition of affordable housing which is in

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					accordance with the definition in the glossary of the National Planning Policy Framework and the definitions and requirements set out in the Mayor of London's Affordable Housing and Viability SPG and Draft London Plan 2017.
H2/13	H2	Clarity required on the incomes needed to purchase affordable intermediate homes.	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Table 8.2 provides the details of the incomes required for intermediate homes. This is compliant with the income requirements set out in the Affordable Housing & Viability SPG and Draft London Plan 2017.
H2/14	H2	Policy should refer to the need for key worker accommodation and Church, community and youth workers should be considered eligible for such accommodation.	1	Diocese of London	No change proposed. The Mayor is introducing London Living Rent as an intermediate housing product with sub-market rents on time-limited tenancies, which will help households on average income levels to save for a deposit. Key workers would be considered eligible for this type of accommodation.
H2/15	H2	Provision of genuinely affordable homes should be prioritised as part of an uplift in values in the area that the transport improvements will generate.	1	David Craine	No change proposed. This is the purpose of the early and advanced stage review mechanisms that will be followed in accordance with the Affordable Housing & Viability SPG. This is set out in policy H2 to

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					maximise the delivery of affordable housing where development viability improves.
H2/16	H2	50% affordable housing target is unrealistic when the Mayor is prepared to accept 35% or lower as determined by the threshold approach to viability.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC has to work in accordance with the requirement set out in the Mayor of London's Affordable Housing and Viability SPG. The Draft London Plan 2017 sets an overall strategic 50% affordable housing target and a 50% target specifically for public sector land, Strategic industrial Location and, Locally Significant Industrial Sites deemed appropriate for alternative use.
H2/17	H2	Need to analyse the number of affordable and family homes that can be provided.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. In accordance with the NPPF, objectively assessed need for housing based on households within the redline boundary is set out in the SHMA. Objectively assessed need for affordable housing in terms of tenure split will likely be achieved due to over delivery of housing above the OAN as demonstrated by the Development Capacity Study (2017). An Affordable Housing Viability Assessment (2017) has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure split: 70% London Affordable Rent/30% Intermediate ;43% London Affordable Rent/57% Intermediate; 30% London Affordable Rent/70% Intermediate.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					This concluded that: 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing.; 30% London Affordable Rent/70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. As such reasonable alternatives to the chosen affordable housing tenure split have been considered. The affordable housing tenure split that has been chosen has been selected because it is a viable option when compared against other reasonable alternatives which would not be viable. As such its selection ensures the Local Plan is deliverable over its period. The SHMA identified a 50% need for family housing. However, the identified SHMA need for family housing needs to be considered against the design and nature of the proposed development at Old Oak and Park Royal and development viability and economics, which shows that SHMA level family housing has an impact on viability. These issues were not considered as part of the SHMA assessment. Given this, 25% family housing is considered an appropriate target but that London Affordable Rent

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					housing does meet its SHMA family housing need. This ensures that the most acute housing need is met. It also helps to ensure that family units are appropriately designed and located with suitable amenity space.
H2/18	H2	Having a threshold approach means that threshold becomes the standard. Developers should be expected to provide more CIL/S106 contributions if that is the case.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is required to be in conformity with the threshold and viability approach outlined in the Mayor of London's Affordable Housing and Viability SPG and draft London Plan 2017. Policy H6 in the draft London Plan 2017 states that " The 35 per cent threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance".
H2/19	H2	The text of these policies is supported by precedent illustrations which almost invariably are of buildings 6-14 storeys height. This is misleading given the density required to meet the housing targets.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The photographs are not intended as exact illustrations of the heights of buildings but represent good examples of particular aspects of development, for example the proportion of affordable housing in a development which has been designed to be tenure neutral.
H2/20	H2	Need a variety of tenures including genuinely affordable rented accommodation.	13	Hammersmith Society, Wells House Road Residents Association,	No change proposed. The tenure mix is in conformity with the Affordable Housing and Viability SPG and Draft London Plan 2017.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	This includes London Affordable Rent (equivalent to social housing at target rent levels), London Living Rent and London Shared Ownership.
H2/21	H2	The 50% affordable housing target is unjustified; it is clear that infrastructure costs of opening up sites in Old Oak will absorb large proportions of S106 and CIL resources limiting the capacity for affordable housing delivery.	15	Old Oak Interim Neighbourhood Forum, Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC has undertaken a Strategic Housing Market Assessment to identify the objectively assessed housing need within the land within the Old Oak and Park Royal red line boundary in accordance with the NPPF. This has indicated a 45% need for affordable housing. The London-wide 2013 SHMA accompanying the current London Plan indicated a 52% affordable housing need city-wide. The Mayor of London has set a strategic target of50% new homes in London should be affordable as set out in the Affordable Housing and Viability SPG and draft London Plan 2017. In addition, the draft London Plan 2017 sets a 50% target threshold for: public sector land; Strategic Industrial Locations; and Locally-Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses. The London Housing Strategy also commits mayoral organisations such as OPDC to 50%. An Affordable Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Viability Assessment 2017 has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure splits: 70% London Affordable Rent/30% Intermediate; 43% London Affordable Rent/57% Intermediate; 30% London Affordable Rent/70% Intermediate. This concluded that: 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing; and 30% London Affordable Rent/70% Intermediate is viable on all the site tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. The Whole Plan Viability Study provides detailed modelling of all policy requirements likely to impact on viability and concludes that, in the round, the policies would be viable. None of the viability modelling tests affordable housing grant which can be used on specific schemes to increase the amount of affordable housing towards the 50% target. OPDC will work with landowners, developers and Registered Providers to apply for grant from the Mayor of London's Affordable Homes Programme to increase affordable housing delivery beyond

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the level that would otherwise be provided without grant. Depending on the funding route, £23k or £43k per additional home beyond the threshold level can be used.
H2/22	H2	Concerned that on evidence to date of permissions granted, coupled with Policy H2a) committing to follow Mayoral guidance, suggests that developers will increasingly pursue offers of 35%, with most units at 80% market rent rather than London Affordable Rent.	15	Old Oak Interim Neighbourhood Forum, Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is required to follow the viability and threshold approach as set out in Mayoral Guidance and in order to help meet the affordable housing needs identified in OPDC's SHMA. The actual affordable tenure that can be delivered on any given scheme is dependent on a number of factors including development viability but also the design of the scheme in terms of separate cores and how different affordable tenures can be managed effectively to keep service charges low, particularly for London Affordable Rent tenants.
H2/23	H2	Housing must be affordable to local residents, including those on below average incomes and who are in unsatisfactory housing.	1	Harlesden Lets	No change proposed. In accordance with the London Mayoral policy and/or guidance, affordable housing is required to meet a range of needs of households who cannot afford private housing. This includes London Affordable Rent for households on the lowest incomes who are on a council housing waiting list and have been awarded a reasonable preference (for example: unsatisfactory housing) but also London Living Rent for those on low to medium incomes who are renting privately and wish to save money for a deposit and Shared

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Ownership. As an extra safeguard, this policy requires developments to include units that are "affordable to households on average incomes in the host local authorities
H2/24	H2	Given the fact that only 30% London Affordable Rent will be delivered in OPDC's area, it will put pressure on the neighbouring boroughs to help meet the OAN.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. In accordance with the NPPF, the Local Plan needs to meet the full, objectively assessed needs (OAN) for market and affordable housing in the local housing market area. According to OPDC's Strategic Housing Market Assessment (SHMA) and based on the area's current population as is required in the NPPF, there is an objectively assessed need for 1,200 additional homes over the Local Plan period (2018 to 2038). The tenure requirements as set out in the SHMA (86% London Affordable Rent) can be delivered for these homes. OPDC's overall development capacity as identified in the Development Capacity Study far exceeds 1,200 new homes. As highlighted in the Housing Evidence Statement, as Opportunity Areas Old Oak and Park Royal can help meet sub-regional housing need that is required across the wider housing market area of the three neighbouring boroughs.
H2/25	H2	Local communities will not benefit from the affordable housing policy because of the proposed tenure split.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas	No change proposed. The NPPF states that local planning authorities should "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	market area, as far as is consistent with the policies set out in this Framework" (paragraph 47) and consider whether other policies [e.g.: viability of development] justify constraining that full objective assessment of need. Objectively assessed housing need has been set out in the SHMA. The objectively assessed need in terms of affordable housing tenure split has been constrained by viability considerations, and this is explained in the Affordable Housing Viability Assessment. The affordable housing tenure split that has been chosen has been selected because it is a viable option when compared against other reasonable alternatives which would not be viable, given the requirement for OPDC to have a 50% affordable housing target. The tenures required by the policy are in general conformity with the draft London Plan 2017 and are in accordance with the NPPF definitions. As an extra safeguard, this policy requires developments to include units that are "affordable to households on average incomes in the host local authorities" and therefore, they are accessible to surrounding communities.
H2/26	H2	Concern about the impact of development on house prices in neighbouring areas which	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents	No change proposed. One of the main reasons for high house prices and high rents is the lack of supply. The regeneration of Old

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		have already seen some of the biggest increases in London.		Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Oak and Park Royal will increase the supply of housing, including affordable housing and help address the in-balance between supply and demand.
H2/27	H2	Table 8.2 should also clarify that for London Living Rent, applicants must already be renting and want to build up money to buy their home.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed- to clarify definition.
H2/28	H2	The description of London Affordable Rent in Table 8.2 should be amended to say 'capped' target rents, in accordance with government guidance. This should exclude service charges.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed- to clarify definition.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H2/29	H2	High rent affordable housing should not be classed as affordable.	1	Harlesden Lets	No change proposed. OPDC is adopting the affordable housing tenures as required in the Mayor of London's Affordable Housing and Viability SPG and this approach is consistent with the NPPF.
H2/30	H2	Less affordable housing on one site should only be permissible if an alternative site is providing a higher percentage.	1	Harlesden Lets	No change proposed. OPDC's overall affordable housing target is 50%. However, each planning application will be considered on its merits and in accordance with the Mayor of London's Affordable Housing & Viability SPG and Draft London Plan 2017.
H2/31	H2	Where developers do not achieve a set percentage, they should be asked to produce their detailed costings, which should be scrutinised.	1	Harlesden Lets	No change proposed. As set out in the policy and supporting text, OPDC will apply the threshold and viability approach as set out in Mayoral policy and/or guidance.
H2/32	H2, para 8.18	50% affordable housing is unachievable on sites with requirements to deliver infrastructure and other site constraints (e.g.: relocation of existing business). This should be specifically recognised in the policy text.	2	Castlepride Limited, Old Oak Park Limited	Change proposed. The supporting text has clarified that on some sites within OPDC, 50% affordable housing will be difficult to achieve. This will particularly be the case on sites that require significant infrastructure to unlock development, such as within Old Oak South and Old Oak North. It is clear in the AHVA and in the Local Plan itself that individual sites may require more detailed site and scheme specific viability analysis when they come forward through the development management process.

Policy H3: Housing Mix

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H3/1	H3	OPDC should allow greater flexibility in its policies for housing mix in areas identified for early development opportunities, such as Scrubs Lane.	1	Remavon	No change proposed. Policy H3 provides a balance between delivering 50% affordable housing, family housing requirements as identified in the Strategic Housing Market Assessment and providing appropriate private amenity space in a high density flatted environment.
H3/2	H3	Clarification on what is meant by housing that is 'appropriately and flexibly designed for changing needs over time'. Any relevant guidance should be directly referenced in the supporting wording.	1	Ealing Council	Change proposed. The supporting wording has been amended to reference the guidance in the Mayor of London's Housing SPG 2016 on designing in flexibility. This includes, for example, designing internal walls in a way that they can be sub-divided.
H3/3	H3	The 25% family housing target is not appropriate; only 20% on average has been delivered London-wide and the nature and density of development at Old Oak means that units will not have appropriate amenity space.	15	Old Oak Park Limited, Fruition Properties, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. As explained in the Housing Evidence Statement, the average density of the proposed development is expected to be high density and the built form is expected to be high density blocks of flats (as opposed to houses with gardens) making a 50% family housing target as is needed according to the SHMA undesirable as many units would

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	be unable to access appropriate amenity and play space.
H3/4	H3, para 8.36	It is difficult to see how to build in flexibly in flats to allow for units to expand or contract. It is suggested that changes are limited to internal changes.	1	Old Oak Park Limited	Change proposed. The supporting wording for Policy H3d) has been amended to recognise the fact that designing flats so that they can expand or contract in size will be more feasible on long-term rented units than flats built for sale when there will not be an opportunity to change the footprint of the unit.
H3/5	H3	The priority should be for affordable family housing.	1	David Craine	No change proposed. Housing Mix Policy H3 specifies that developments should deliver a London Affordable Rent housing mix in accordance with OPDC's most up to date Strategic Housing Market Assessment (SHMA). This meets the acute need for London Affordable Rent but also provides some market family and intermediate housing to help meet needs.
H3/6	H3	Some of the supporting text in H3 should be moved to H4.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. Policy H4 sets out how family housing should be sensitively designed and appropriately located so that it is suitable for families with children. The introductory text to H4 refers to delivering a mix in accordance with Policy H3 where the supporting text details the identified needs for family housing.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
H3/7	H3, para 8.37	Support policy on designing in flexibility.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
H3/8	H3, para 8.35	Internal space standards should comply with London Plan recommendations as a minimum.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This is as required in the supporting text.
H3/9	H3	The policy should be amended to require 51% family sized affordable housing and 64% family market housing as evidenced by the SHMA.	16	Old Oak Interim Neighbourhood Forum, Hammersmith Society, Harlesden Lets, Grand Union Alliance, Wells House Road Residents	No change proposed. The Housing Evidence Statement explains that the identified SHMA need for family housing needs to be considered against the design and nature of the proposed development at Old Oak and Park Royal and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	development viability and economics, which are not considered as part of the SHMA assessment. Given this, 25% family housing is considered an appropriate target but that London Affordable Rent housing does meet its SHMA family housing need. This ensures that the most acute housing need is met. It also helps to ensure that family units are appropriately designed and located with suitable amenity space.
H3/10	H3	Evidence of overcrowding in the SHMA is not being addressed. This could be addressed by delivering more larger family homes as evidenced in the London Assembly Crowded Homes report delivering a downchain to release smaller units for smaller households.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's SHMA identifies that overcrowding is most significant in the social housing sector and that it has become more significant in the private rented sector in recent years but that levels of overcrowding have been stabilising. By delivering family-sized London Affordable Rent homes in accordance with the SHMA requirements, OPDC can help to address overcrowding in the social housing sector. Delivery of London Living Rent homes can also help address the issue of overcrowding in the private rented sector as there will be an increased supply of affordable homes available for private renters who may otherwise overcrowd. Other policies in this Local Plan, for example, H9, promotes the delivery of specialist housing which can

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					free up existing family housing and help alleviate overcrowding.
H3/11	H3	Targets should be set for 4 and 5 bed units in accordance with the SHMA need.	14	Grand Union Alliance, Harlesden Lets, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. For London Affordable Rent homes, Policy H3 requires the delivery of a SHMA compliant mix. This will mean that the need for four and five bedroom London Affordable Rent homes identified in the SHMA can be met. The 25 per cent over-arching target also allows for larger units to be provided in other tenures but in a way that is sensitive to viability and the nature of the development in the area.
H3/12	H3	Need to set out how OPDC will work with the boroughs to meet need for family housing.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. According to OPDC's Strategic Housing Market Assessment (SHMA) and based on the area's current population as is required in the NPPF, there is an objectively assessed need for 1,200 additional homes over the Local Plan period (2018 to 2038). Given the overall capacity for homes is much larger, approx. 20,000 homes over the Local Plan period, the objectively assessed family housing requirements based on the existing population can be met, in addition to assisting the London Boroughs of Brent, Ealing and Hammersmith & Fulham to meet their family housing requirements.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H3/13	H3	OPDC will not achieve a mix comparable with the surrounding area and may limit the ability of smaller households to grow and remain in the area in the long-term.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Old Oak and Park Royal are Opportunity Areas in the London Plan. Given the need to optimise development to meet the housing targets, the development will not be of the same built form of the existing housing in the surrounding area. However, it can be complementary and provide a housing mix to meet a range of needs both to newly forming households and established households in the surrounding area who wish to move. Smaller units built can provide opportunities for under-occupying existing households in the surrounding area to down-size thereby providing opportunities for growing families to move up. In addition, the new development can provide new affordable family units.
H3/14	H3	Harlesden Lets would be pleased to pay a role in supporting families in private rented accommodation.	1	Harlesden Lets	Noted.
H3/15	H3	Need to future proof dwellings so that they are easier to adapt if residents become disabled. Need to consider this in all areas of the building.	1	Harlesden Lets	No change proposed. Policy H3 ensures that 90% of units are delivered to Building Regulation M4(2)"accessible and adaptable dwelling" standard. Policy D3 requires proposals for buildings, open spaces, the public realm and infrastructure to adhere to the latest guidance on accessible and inclusive design.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H3/16	H3	Developments have not been delivering significant proportions of family housing.	1	Harlesden Lets	Noted.
H3/17	H3	There is an equalities impact from not delivering more family housing to ease the impact of overcrowding which is more prevalent in BME communities.	1	Harlesden Lets	No change proposed. The Integrated Impact Assessment has identified that the housing policies as a whole will have a positive impact on delivering a mixed and sustainable community.

Policy H4: Design of Family Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H4/1	H4	It would be useful to acknowledge where residential sites are suited to providing commercial use and active frontages at street level, family accommodation will need to be on the upper floors.	1	Castlepride Limited	No change proposed. The policy and supporting text allows for family housing to be located on other floors with access to secure private and/or communal open space.
H4/2	H4, para 8.39	Given the 25% family housing target, most family units delivered will be provided in accordance with Part B.	1	Old Oak Park Limited	Noted.
H4/3	H4	There are no details about the provision of family housing.	1	Friary Park Preservation Group	No change proposed. The policy provides guidance on the design of family housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					to ensure that it is appropriately located to be suitable for families with children.
H4/4	H4	Concerns over lack of commitment to building affordable family home in accordance with the need identified in the Strategic Housing Market Assessment (SHMA).	12	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Affordable Housing Viability Assessment modelling shows that delivering SHMA levels of family housing has an impact on the viability of delivering 50% affordable housing overall because larger units are worth less per square foot than 1 and 2 bed units. Setting a higher family housing target would also mean that many units delivered would not have access to acceptable private or communal amenity space or other amenities. These units would unlikely be attractive to families with children.
H4/5	H4	The policy would benefit from more detailed guidance on housing design, such as the GLA's Housing Design Guide.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Mayor of London's Housing SPG 2016 provides guidance on housing design. There is not a need to repeat this in OPDC's Local Plan.

Policy H5: Existing Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H5/1	H5	Support approach to resist loss of existing residential accommodation unless it is critical to unlock comprehensive regeneration.	2	T.A.S.B. Investments Limited, Hammersmith Society, Friary Park Preservation Group	Noted.
H5/2	H5	This policy is currently mis-phrased to mean that only the conversion as a whole would require access to private or communal open space. Suggest 'at least one family sized unit (3+ bed) with access to private or communal open space is provided through each conversion.' It should also be clarified in the supporting wording that this does not alter the London Plan requirement for 'private amenity space'.	1	Ealing Council	Change proposed. The policy now reads " at least one family sized unit (3 bed+) with access to secure private and/or communal space is provided through each conversion". However, given the layout of the building it might not always be possible for the non-family units in a converted house to have access to secure private space although these units will be required to meet the minimum space standards.
H5/3	H5	Policy is sound.	1	Friary Park Preservation Group	Noted.
H5/4	H5	Empty homes should be brought back to full occupancy.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe,	No change proposed. Policy H5 and the supporting text provides for OPDC to "work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham and other stakeholders to bring vacant residential properties back into use".

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
H5/5	H5	The policy should set a consistent and robust approach to EDMOs and CPOs and a mechanism for dealing with appeals.	1	Harlesden Lets	No change proposed. OPDC's powers are limited in this area. OPDC will positively work with the local authorities when they issue Empty Property Management Orders. Where necessary and appropriate, and there is a compelling case in the public interest, OPDC will use compulsory purchase powers as set out in Policy DI4.
H5/6	H5	The policy should specify how exactly it will resist loss of existing housing. The policy should support retrofitting on new homes. It should also ensure that where a proposal would result in new housing that it re-provides an equal amount of space, rooms and tenure.	14	Grand Union Alliance, Harlesden Lets, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's powers are limited in this area. OPDC will work positively with the local authorities and landowners to bring empty properties back into habitable use as is set out in the supporting text. Replacing existing housing on at least a like-for-like basis in terms of unit numbers and floorspace is set out in the policy and supporting text. In terms of tenure, the key concern is protecting affordable housing units from loss. This is covered through the perpetuity provisions in Policy H2.

Policy H6: Build to Rent

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H6/1	H6	Concerns about the affordability of London Living Rent or similar and whether it will be affordable to local people.	15	Crisis Brent, Harlesden Lets, Grand Union Alliance, London Borough of Hammersmith and Fulham, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. London Living Rent is one of three types of affordable homes supported by the Mayor of London, as required by the Affordable Housing & Viability SPG 2017 and Draft New London Plan Policy H7. London Living Rents are for low to middle-income households who now rent privately and want to build up a deposit to buy a home by making savings on their monthly rent. OPDC has agreed a Nominations Policy to ensure that eligible local people are prioritised for London Living Rent homes delivered in the local area.
H6/2	H6	As Build to Rent schemes are typically tenure blind, they provide an opportunity to deliver mixed income communities provided that viability considerations can be addressed.	1	Crisis Brent	Noted.
H6/3	H6	Include a statement in the Local Plan signalling its intention to encourage delivery of a proportion of a Built to Rent housing for those on the lowest incomes.	1	Crisis Brent	No change proposed. The policy has been drafted in accordance with the Mayor of London's Affordable Housing & Viability SPG and Draft New London Plan Policy H7. This specifies that Build to Rent schemes are not required to provide London Affordable Rent housing, i.e.: social rent. This is because Build to Rent providers are not required to be Registered Providers of Social Housing. London Living Rent is the Mayor of London's

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					preferred affordable housing product for schemes under this policy.
H6/4	H6	Query how this policy will provide affordable housing on Build to Rent, as it is not clear how they will meet the 35% threshold.	1	London Borough of Hammersmith and Fulham	Change proposed. The policy and supporting text has been amended to be in general conformity with the Draft New London Plan 2017. In accordance with Policy H2 (of OPDC's Local Plan), Build to Rent housing will be subject to the Mayor of London's most up-to-date threshold approach to viability. The threshold approach to viability is set out in London Plan Policy H7.
H6/5	H6	Support policy on build to rent.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
H6/6	H6, para 8.50	Affordable housing should be in perpetuity. Policy should set out how loss of existing housing will be resisted and require schemes to reprovide an equal amount of space, rooms and tenure.	1	Harlesden Lets	No change proposed. As set out in the supporting text and in accordance with the NPPF, Build to Rent affordable units must be retained as affordable units in perpetuity, regardless of whether the separate full market rent units are sold out of the rental market at any point. If private rent units are sold, the sale of the affordable units will only

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					be accepted if it can be fully demonstrated that the units cannot be retained as affordable housing. In such cases the equivalent level of affordable tenure housing should be provided in the vicinity of the site.
H6/7	H6	Clarify whether policy H6 is only seeking London Living Rent or if not, clarify that it is seeking some provision at higher rent levels.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The policy and supported text has been amended in accordance with Draft New London Plan 2017 Policy H13 to specify that Build to Rent will be required to provide affordable housing in the form of discount market rent, at least 30% at London Living Rent levels.
H6/8	H6	Deposit savings options should not be compulsory or a condition of the tenancies.	1	Harlesden Lets	No change proposed. This was a policy option in the Regulation 18 version of the Local Plan that has not been taken forward. Deposit saving options will not be compulsory.
H6/9	H6	Build to Rent lets should be on assured (non-shorthold) tenancies to support the creation of lifetime neighbourhoods.	1	Harlesden Lets	No change proposed. The Affordable Housing & Viability SPG and Draft New London Plan 2017 Policy H13 sets out the tenancy requirements: longer tenancies (three years or more), with break clauses that allow the tenant to end the tenancy with a month's notice any time after the first six months. Providers will be required to offer rent certainty for the period of the tenancy,

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the basis of which should be made clear before a tenancy agreement is signed, including any annual increases which should always be formula-linked. Build to Rent will have to be operated by providers who have a complaints procedure in place and are a member of a recognised ombudsman scheme; and not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.
H6/10	H6	OPDC should set an annual target to measure/monitor delivery of Build to Rent.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Build to Rent will provide units that will be measured and monitored as part of the overall housing supply targets set out in the Local Plan as well as the affordable housing targets where the units are delivered as affordable housing.

Policy H7: Purpose-Built Shared Housing and existing HMOs

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H7/1	H7, para 8.61	OPDC should look again at how it could encourage innovation in the area of HMOs to make on-	1	Crisis Brent	No change proposed. This policy supports the retention of existing high quality HMOs which can provide affordable

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		site provision of affordable housing.			accommodation for single households. However, as set out in the supporting text, large-scale purpose-built shared housing is unlikely to be available at a price that is affordable for a household with an affordable housing need. However, this can generate a commuted sum to fund additional supply of conventional affordable housing. This policy is in conformity with the Draft London Plan 2017 (Policy H18).
H7/2	H7	Support the role HMOs can play in meeting housing need provided they are affordable, well-managed and offer tenancy sustainment support	2	London Borough of Hammersmith and Fulham, Harlesden Lets	Noted.
H7/3	H7	Support policy on shared housing.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H7/4	H7, para 8.63	HMOs are causing significant issues in existing residential communities and stronger policies are required to manage them.	22	Mark Walker, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Harlesden lets, Nicky Guymer, Bruce Stevenson, Dave Turner of TITRA, Mark Walker, Midland Terrace Residents, Nye Jones	No change proposed. OPDC does not have Housing Act licencing or enforcement powers for HMOs. However, OPDC will work positively with the London Boroughs of Brent, Ealing and Hammersmith & Fulham in ensuring effective management of HMOs. This is already set out in Policy H7 and in the supporting text.
H7/5	H7	Overcrowded HMOs will be the only affordable option for many residents.	1	Harlesden Lets	No change proposed. By increasing the housing supply OPDC can help redress the imbalance between housing need and housing supply by providing affordable housing to meet a range of needs and incomes. This policy supports the retention of existing HMOs meeting the necessary standards and supports the building of new purpose-built shared housing which can generate a commuted

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					sum to fund conventional affordable housing.

Policy H8: Gypsy and Traveller Accommodation

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H8/1	H8	The plan should recognise that there are current problems with the Bashley Road gypsies and travellers site that warrant addressing, including poor drainage, noise and disturbance and vehicle access.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The London Borough of Ealing owns the site and as a housing authority is responsible for managing and maintaining the site in order to meet relevant environmental health standards. However, the policy wording has been amended to state that OPDC will work positively with London Borough of Ealing to enhance the existing site where this is appropriate.
H8/2	H8	Policy H8 supporting text states that there is no need arising in the OPDC area for Traveller pitches. The OPDC GTANA (2017), Policy H8 and supporting text does not acknowledge that LBHF and RBKC are jointly responsible for a Traveller site at Stable Way and that the two Councils have completed a Joint GTANA (Dec 2016). The study	1	Royal Borough of Kensington and Chelsea	No change proposed. There is one Gypsy and Traveller Site within OPDC's boundaries at Bashley Way, Park Royal. OPDC's Gypsy and Traveller Accommodation Needs Assessment (GTANA) identified that there was no need for additional pitches during the Local Plan period, in accordance with guidance on completing GTANAs and the Planning Policy for Traveller Sites (PPTS). The Royal Borough of Kensington & Chelsea and

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		applies the PPTS definition of Travellers and concludes that the total accommodation needs across the two boroughs, LBHF and RBKC, is 9 pitches to 2030. This needs to be acknowledged and considered as part of the OPDC GTANA, Policy H8 and associated supporting text to reflect that there is need arising within LBHF, fulfil the Duty to Cooperate and satisfy the tests of soundness. The policy approach also does not reflect the work that LBHF is currently undertaking in respect of identifying sites to help meet need arising in the Joint GTANA. There are potential opportunities for additional pitch provision to be delivered as part of OPDC regeneration proposals, for land within the LBHF area, to assist LBHF to meet its joint Traveller needs.			London Borough of Hammersmith & Fulham are jointly responsible for one permanent site outside of OPDC's boundaries. OPDC has conducted a site assessment of land in its area to help meet needs of the Gypsy and Traveller community in these two boroughs. This has concluded that there is no land available.
H8/3	H8	Support for the policy which states that OPDC will work with the boroughs and give careful consideration to the future needs of gypsies and travellers.	1	London Borough of Hammersmith and Fulham	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H8/4	H8	Noted potential difficulty in providing sites for gypsies and travellers.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
H8/5	H8, para 8.64	The plan should recognise that there are current problems with the Bashley Road gypsies and travellers site that warrant addressing, including poor drainage, noise and disturbance and vehicle access.	15	Harlesden Lets, Grand Union Alliance, Ealing Council, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The policy now specifies that OPDC will safeguard the site and work positively with London Borough of Ealing to improve the existing site so that it continues to provide suitable accommodation. The supporting wording has also been amended to clarify the planning authority's obligations in terms of safeguarding the site and the housing authority's obligations in terms of housing standards and conditions.

Policy H9: Specialist Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H9/1	H9	The Plan does not protect against the loss of existing specialist accommodation. Recommended that the policy also include: 'Proposals for conversions or loss of existing specialist housing will be supported where they: f) no longer meet identified local need for specialist housing; g) do not comply with any relevant standards, including quality; h) give rise to unacceptable impacts on amenity, or i) are not required through their reconfiguration or redevelopment for a recognised specialist housing need.'	1	Brent Council	Change proposed. Criteria have been added to this policy to assess the loss of this form of housing.
H9/2	H9	This policy is currently very open-ended. Suggested that is should support specialist housing that meets identified needs.	2	Ealing Council, Harlesden Lets	Change proposed as suggested. This is to clarify that proposals for specialist housing should meet an identified need.
H9/3	H9	Policy should ensure mix of specialist housing with other types of units to support lifetime neighbourhoods and social mix.	1	Ealing Council	No change proposed. The policy will support lifetime neighbourhoods and a social mix by requiring large residential schemes of over 1,000 units to provide 10 per cent specialist housing.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H9/4	H9	Requiring 10% homes as specialist housing will have a detrimental impact on viability. It is better to provide some flexibility such as that contained in the student housing policy	1	Old Oak Park Limited	No change proposed. OPDC's SHMA identifies an 8.6% need for specialist housing. As with the level of affordable housing and family housing, the specialist housing requirements on sites will be considered as part of the planning application process and subject to development viability.
H9/5	H9	Where wheelchair accessible housing is provided, there needs to be a consideration for parking spaces.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC's Local Plan requires disabled car parking to accord with mayoral policy. The new draft London Plan 2017 states that disabled residential parking should be provided in new developments (for both M4(2) and M4(3) dwellings) but that this should count towards the maximum parking provision for the development.
H9/6	H9	There are no details about the provision of specialist housing.	1	Friary Park Preservation Group	No change proposed. Policy H9 sets a target for the delivery of specialist housing and sets out that this should be appropriately designed for the intended occupiers and support they require. Individual planning applications will provide details of actual specialist units that are to be delivered.
H9/7	H9	There needs to be an effective provision of specialist housing, particularly for older people.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	No change proposed. This is why the policy sets a specialist housing target in order that specialist housing needs can be met in the area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

Policy H10: Student Housing

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H10/1	H10	Support policy to meet increasing demand for student places, and the role this can play in placemaking and relieving pressure or demand for other housing types.	15	Imperial College, Citrus Group and Fuller Smith & Turner, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
H10/2	H10	This policy should also make reference to high quality design and space standards to ensure that internal spaces are liveable.	1	London Borough of Hammersmith and Fulham	Change proposed. A policy line on high quality design of internal space has been included.
H10/3	H10	The policy is failing to protect against a mono-type of housing form developing in the area, e.g.: North Acton. Large areas of development of student accommodation creates a transient community, consisting almost exclusively of one demographic – rather than a diverse lifetime neighbourhood.	15	Old Oak Interim Neighbourhood Forum, Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy H10 is intended to ensure that student housing is provided as part of a diverse housing mix that does not undermine delivery of conventional housing supply. In terms of North Acton specifically, Policy P7 envisages contributing to the delivery of 4,300 new homes during the first 10 years and "appropriate levels of student accommodation". This policy also plans for improving the public realm and infrastructure in the area.
H10/4	H10	It is not clear how the OPDC will measure and monitor undermining of conventional self-contained housing supply and ‘overconcentration’ in any one specific location.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed to Policy H1 in accordance with draft London Plan 2017. Every three student bedrooms that are completed equate to meeting the same need that one conventional housing unit meets, and contribute towards meeting OPDC's housing targets. This will enable OPDC to measure and monitor student housing delivery so that it does not undermine delivery of the overall housing target. Any new student housing in locations such as North Acton will be required to meet Policy H10 requirements

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					in delivering a sustainable and mixed community.
H10/5	H10	The policy should include a map that shows areas where this already an over-concentration of student accommodation and where it may be appropriate to deliver more, subject to need being demonstrated.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. It is recognised in Policy P7 that North Acton is home to recently built and permitted high density student accommodation and that in order to deliver a sustainable and mixed community, proposals for new student accommodation will need to accord with Policy H10.
H10/6	H10	The Policy should set out the need for student housing.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The Policy and supporting text has been added for proposals to have to demonstrate there is a local or London need for student housing.
H10/7	H10	The policy should stress the need for social infrastructure to support the needs of students and avoid putting stress on services.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. This is set out in the requirements for providers to produce a Residential Management Plan to ensure that the impacts on local amenity are mitigated. The need for social infrastructure will be assessed against Policy TCC4.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
H10/8	H10	OPDC is responsible for meeting the housing needs of all students within the housing market area, not students belonging to a specific organisation.	14	Harlesden Lets, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The student accommodation must either be operated directly by a higher education institution or the development must have an undertaking in place from initial occupation, to provide housing for students at one or more specified higher education institutions, in accordance with the Draft New London Plan 2017.
H10/9	H10	Student housing should ensure delivery of an appropriate quota of publicly accessible green and open spaces.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Student housing as well as other housing developments will be required to provide or make appropriate contributions to public open space in accordance with Policy EU1.

9. Employment

General

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E/1	ALL	Employment policies are too prescriptive and have a value impact which is not reflected in the evidence base. Policies would affect the overall viability of development proposals	**1**	DS2 (on behalf of Old Oak Park Limited)	No change proposed. The Whole Plan Viability Study has tested the cumulative impact of the policies in the Local Plan. The requirements for applicants to demonstrate robust engagement with affected businesses throughout pre- and formal application process is aligned with OPDC's SCI. The requirement to co-locate floorspace only applies to broad industrial type activities which are compatible with the Place land use policy. With regards to potential site-specific viability impacts, Policy DI1 makes it clear that, OPDC will appropriately balance the priorities for a range for contributions, this would include any requirements for affordable workspace. This would be assessed on a case by case basis.

E/2	ALL	Employment policies are too prescriptive and have a value impact which is not reflected in the evidence base. Policies would affect the overall viability of development proposals	**1**	DS2 (on behalf of Old Oak Park Limited)	No change proposed. The Whole Plan Viability Study has tested the cumulative impact of the policies in the Local Plan. The requirements for applicants to demonstrate robust engagement with affected businesses throughout pre- and formal application process is aligned with OPDC's SCI. The requirement to co-locate floorspace only applies to broad industrial type activities which are compatible with the Place land use policy. With regards to potential site-specific viability impacts, Policy DI1 makes it clear that, OPDC will appropriately balance the priorities for a range for contributions, this would include any requirements for affordable workspace. This would be assessed on a case by case basis

Policy E1: Protecting Existing Economic and Employment Floorspace

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E1/1	E1	Support the objective of draft Policy SP5 which seeks the protection, strengthening and intensification of the Strategic Industrial Location (SIL) in Park Royal. However, SIL sites require supporting/ancillary uses for workers etc. more	10	CBRE (on behalf of SEGRO)	No change proposed. The provision of small scale 'walk to' services for industrial occupiers is covered in the Town Centre and Community Uses chapter.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		flexibility should be built into the SIL definition.			
E1/2	E1	A strong commitment to reproviding affordable workspaces is required, including monitoring. Existing artist studios in the area should be acknowledged.		Joanna Betts; ACAVA; Nadia Samara; Nicholas Kasic; Francis, Marc annd Caroline Sauzier; Patrick Munroe; Lily Gray; Hammersmith Society; Wells House Road Residents Association; Ralph Scully; Catherine Sookha; Lynette Hollender; Grand Union Alliance; Jeremy Aspinall; Thomas Dyton;	Change proposed. Policy E2 has been amended to clarify the requirements for supporting businesses. Policy E3 also requires an appropriate quantum of affordable, shared or small business units. The proposed Local Plan Key Performance Indicators (KPIs) include a measure of total area of affordable employment floor space proposed in permitted schemes, as a proportion of overall employment space. The Local Plan KPIs will be subject to regular monitoring and this information will be publicly available as part of the Authority Monitoring Report. The supporting text for E1 acknowledges that there is a well established network of artist studios in the area.
E1/3	E1	Concern about the negative impacts of job/business losses and strategies for relocation and reprovision are unrealistic. A stronger commitment, monitoring and more information is required to manage displacement and ensure existing businesses are supported.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The jobs capacity figures are now expressed as new jobs. OPDC has updated the Industrial Land Review to demonstrate how no net loss of industrial floorspace would be achieved through the Local Plan, including reprovision of industrial floorspace in Old Oak. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Intensification will provide increased capacity to accommodate incompatible uses being relocated from Old Oak. Policy E2 has been amended to clarify the requirements for supporting businesses. Policies E1 and E2 also support the delivery of workspaces for identified growth sectors which includes existing sectors which are important to the local economy. The Local Plan Key Performance Indicators (KPIs) will be subject to regular monitoring and this information will be publicly available as part of the Authority Monitoring Report. The KPIs will monitor the loss/gain of employment floorspace and a number of employment and business related indicators.
E1/4	E1	Policy on SIL is too narrowly worded and does not properly reflect proposals for the Twyford Tip site.		Turley (on behalf of Ashia Centur Limited)	No change proposed. The supporting text to Policy P4 notes that the site has extant planning permission (granted in 1993). However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use and therefore it is proposed to remain

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					designated as part of the Strategic Industrial Location (SIL).
E1/5	E1	Support proposed de-designation of SIL is integral to delivering development of the Old Oak Common Opportunity Area. Protection and intensification of the remaining SIL will also be important.		GLA	Noted.
E1/6	E1	Arrangements should be put in place for businesses affected by SIL de-designation. Policy requiring a sequential approach to support the relocation of businesses affected by SIL designation should be strengthened.		GLA	Change proposed. It is noted that the new draft London Plan (2017) requires no net loss of industrial floorspace capacity within designated SIL. The Industrial Land Review Addendum demonstrates how this objective will be achieved through OPDC's Local Plan. Policies E1 and E2 have been amended to reflect the Industrial Land Review Addendum. Achieving no net loss in industrial floorspace will ensure that businesses have the opportunity to relocate within OPDC 's area and should mean that the sequential approach can be implemented effectively. Policy E2 and its supporting text have been amended to clarify requirements for supporting business relocation.
E1/7	E1	Many existing businesses are unlikely to be compatible with the new vision for the area.		DS2 (on behalf of Old Oak Park Limited)	No change proposed. It is noted that the new draft London Plan (2017) requires no net loss of industrial floorspace capacity

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Policy requirements for re-providing/relocating existing and providing new or affordable workspace are inappropriate, onerous and create a tension with viability of funding delivering infrastructure and homes/job targets.			within designated SIL. The Industrial Land Review Addendum demonstrates how this objective will be achieved through OPDC's Local Plan, including through industrial intensification and co-location of uses. Policies E1 and E2 have been amended to reflect this requirement. The requirement to co-locate floorspace only applies to broad industrial type activities which are compatible with the Place land use policy.
E1/8	E1	OPDC should also utilise GVA to measure growth of industry in Park Royal.		Park Royal Business Group	Change proposed. Additional Key Performance Indicators have been added for total GVA. The Local Plan cannot control the businesses that take up the commercial floorspace created through development, therefore it will not be possible to measure growth in specific sectors as part of the planning process. However, future updates to the evidence base will be able to assess and analyse strategic changes in the local economy.
E1/9	E1	Impact of automation on employment needs to be better addressed in the Plan and evidence base.		DS2 (on behalf of Old Oak Park Limited)	No change proposed. The full impact of automation cannot be accurately known or predicted. It is important that planning policy ensures that development proposals retain flexibility so that the area is capable of responding to changes over time.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E1/10	E1	Careful consideration needs to be given to occupier needs and their operational requirements as part of intensification.		CBRE (on behalf of SEGRO)	No change proposed. The Park Royal Intensification Study explores opportunities as well as deliverable and commercially viable strategies to intensify industrial land. This Study demonstrates that there are sites where it is possible to increase the amount of floorspace and jobs in Park Royal. The Local Plan will require all sites to be intensified where feasible and changes have made to confirm this. If intensification is not feasible, this should be demonstrated by the applicant.
E1/11	E1	Request that OPDC takes on a more proactive role such as identifying and allocating new sites for industrial development, and/or by assisting in the land assembly process to ensure such sites are available. This will help ensure that there is sufficient support within the Plan to facilitate the delivery of the site allocation objectives.		CBRE (on behalf of SEGRO)	Change proposed. It is noted that the new draft London Plan (2017) requires no net loss of industrial floorspace capacity within designated SIL. The Industrial Land Review Addendum demonstrates how this objective will be achieved through OPDC's Local Plan, including through industrial intensification and co-location of uses. New industrial site allocations have been introduced and Policies E1 and E2 have been amended to reflect this requirement. Policy DI3 also provides guidance on how OPDC will help facilitate delivery of development.
E1/12	E1	c)Insert ‘be’:		London Borough of Hammersmith and Fulham	Noted. This policy requirement is now covered in Policy D6.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E1/13	E1	Support protection of existing economic functions and creation of new jobs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
E1/14	E1	Should reclassify Park Royal as Strategic Commercial Land as there is a whole range of employment uses ranging from offices to industrial, catering to small craft businesses	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The term Strategic Industrial Location is used to reflect its designation in the London Plan and to ensure clarity and consistency with the scope of protection for a range of industrial uses in this area. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, the loss of industrial land across London and the ongoing demand for industrial space. Policy P6 and TCC1 seek to ensure there is a good range of facilities available to support local businesses and residents including additional town centres uses.
E1/15	E1	Need additional detail on how to support businesses and affordability	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts,	Change proposed. Policy E2 and its supporting text has been amended to clarify the arrangements for supporting

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	businesses. Policy E3 sets out policy criteria to secure an appropriate quantum of affordable, shared and/or small business units in order to support specific purposes i.e. to help start-up businesses. Introducing additional detail in the policy would adversely affect the clarity of the policy. OPDC may consider preparing an Affordable Workspace SPD to provide more detailed guidance on this area of policy. An SPD can also be updated more regularly than a Local Plan document to respond to changes over time.
E1/16	E1	A strong commitment to reproviding affordable workspaces is required, including monitoring. Existing artist studios in the area should be acknowledged.		Joanna Betts; ACAVA; Nadia Samara; Nicholas Kasic; Francis, Marc annd Caroline Sauzier; Patrick Munroe; Lily Gray; Hammersmith Society; Wells House Road Residents Association; Ralph Scully; Catherine Sookha; Lynette Hollender; Grand Union Alliance; Jeremy Aspinall; Thomas Dyton;	Change proposed. OPDC has updated the Industrial Land Review to demonstrate how no net loss of industrial floorspace would be achieved through the Local Plan, including reprovision of industrial floorspace in Old Oak and the intensification of Park Royal. Policies E1 and E2 have been amended to reflect this requirement and clarify the arrangements for supporting businesses. Policies E1 and E2 also support the delivery of workspaces for identified growth sectors which includes creative sectors. In addition to this, Policy E3 sets out policy criteria to secure an appropriate quantum of affordable, shared and/or small business units in order to support specific

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					purposes i.e. to help start-up businesses. The Local Plan Key Performance Indicators (KPIs) will be subject to regular monitoring and this information will be publicly available as part of the Authority Monitoring Report. The KPIs will monitor the loss/gain of employment floorspace and a number of employment and business related indicators. The supporting text has been updated to include reference to a well established network of artist studios, rather than listing individual studios to avoid the information becoming out of date.
E1/17	E1	Concern about the negative impacts of job/business losses and strategies for relocation and reprovision are unrealistic. A stronger commitment, monitoring and more information is required to manage displacement and ensure existing businesses are supported.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The jobs capacity figures are now expressed as new jobs. OPDC has updated the Industrial Land Review to demonstrate how no net loss of industrial floorspace would be achieved through the Local Plan, including reprovision of industrial floorspace in Old Oak. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable. Intensification will provide increased capacity to accommodate incompatible uses being relocated from Old Oak. Policy E2 has been amended to clarify the requirements for supporting businesses. Policies E1 and E2 also

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					support the delivery of workspaces for identified growth sectors which includes existing sectors which are important to the local economy. The Local Plan Key Performance Indicators (KPIs) will be subject to regular monitoring and this information will be publically available as part of the Authority Monitoring Report. The KPIs will monitor the loss/gain of employment floorspace and a number of employment and business related indicators.
E1/18	E1	OPDC should also utilise GVA to measure growth of industry in Park Royal.		Park Royal Business Group	Change proposed. Additional Key Performance Indicators have been added for total GVA. The Local Plan cannot control the businesses that take up the commercial floorspace created through development, therefore it will not be possible to measure growth in specific sectors as part of the planning process. However, future updates to the evidence base will be able to assess and analyse strategic changes in the local economy.
E1/19	E1, para 9.12	Applicants should provide more evidence to demonstrate the support provided to sustain existing businesses and social and community uses	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	Change proposed. Policy TCC4 already seeks to protect existing social infrastructure facilities but Policy E2 has been amended to clarify the requirements for supporting existing businesses. The proposed Local Plan Key Performance Indicators (KPIs) also include a number of

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	employment and business related indicators. The Local Plan KPIs will be subject to regular monitoring and this information will be publicly available as part of the Authority Monitoring Report

E2: New Employment Floorspace

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E2/1	E2	Providing additional non SIL uses above SIL uses would not jeopardise the SIL use but continue to increase employment densities as part of intensification strategy.	1	DP9 (on behalf of A40 Data Centre BV);	No change proposed. The Mayor's London Plan sets out the strategic approach to promoting and managing industrial land, including defining which uses are appropriate within Strategic Industrial Locations (SIL). In line with the London Plan, hotel uses are not appropriate in SIL. OPDC's key priorities for SIL are to protect, strengthen and intensify the industrial area. Delivering high employment densities is not the overriding objective of SIL, it is supposed to provide a reservoir of land and floorspace/uses for broad industrial type activities. Therefore, Policy E1 requires all applications in SIL to be comprised of uses appropriate to this location. The Park Royal Intensification Study demonstrates that intensification is

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					deliverable and, as such, intensification will be supported wherever feasible and where it is comprised of appropriate uses. If intensification is not feasible, this should be demonstrated by the applicant.
E2/2	E2	Policies should be stronger in supporting intensification and allow flexibility for intensification proposals.		London Borough of Ealing	Change proposed. New industrial site allocations have been introduced, using information from the Park Royal Intensification Study. In addition to this, the Local Plan policies (P4, P5 and E1) support intensification of industrial uses within SIL where this is feasible.
E2/3	E2	Support policies promoting future growth sectors, particularly 'Med Tech' uses.	1	Deloitte LLP (on behalf of Imperial College)	Noted.
E2/4	E2	Policy E2 should set a quantum/target or ask for significant proportion of affordable workspace provision.	1	London Borough of Brent; ACAVA	No change proposed. E3 requires an appropriate quantum of affordable workspace which would be assessed on a case by case basis. This provides flexibility to determine the most suitable approach as, in some cases, the delivery of small business units may be more appropriate. OPDC may consider providing more detail on implementing this policy this as part of preparing an Affordable Workspace SPD. An SPD could be updated more regularly than a Local Plan document.
E2/5	E2	Provision of a Marketing Statement and evidence is inappropriate and not	1	DS2 (on behalf of Old Oak Park Limited)	Change proposed. The design of commercial premises must be fit for purpose and Policies E1 and E2 have been

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		necessary. Planning should not involve itself with the way in which developers inform the design of commercial premises			amended to reflect this. The policies require buildings to be well designed for their intended purpose having regard to identified future growth sectors. This will have to be demonstrated through a Design and Access statement.
E2/6	E2	Requirements in E2 are unlikely to incentivise intensification.	1	CBRE (on behalf of SEGRO)	Change proposed. Policy E3 now clarifies that proposals should deliver affordable, shared and/or small business units.
E2/7	E2	The design of mixed use (residential and commercial) development is critically important and should be covered in Policy E2.	1	CBRE (on behalf of SEGRO)	No change proposed. Policies D1, D4 and D6 already set out comprehensive criteria to assess design quality and approach.
E2/8	E2	Support providing a range of workspaces. This policy should also include reference to new employment space being designed to be flexible so that any development can be responsive to changing needs.	1	London Borough of Hammersmith and Fulham	Change proposed. Policy E1 and E2 have been amended and clarify that proposals must be well designed but also have regard to the need for flexibility.
E2/9	E2	Need explanation of how jobs will be created and who providers will be	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. New jobs will be created as new commercial floorspace is delivered in the area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
E2/10	E2	Policy on new employment floorspace should refer to the reprovision of existing businesses	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Policy E2 has been amended to clarify the requirements for supporting existing businesses.
E2/11	E2	Support for new employment floorspace which has a range of tenure and size options	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. This is now covered in Policy SP5
E2/12	E2	All developments should help with the reprovision of employment floorspace, and policy should be amended to ensure small business and	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic,	Change proposed. Policy E2 has been amended to clarify the requirements for supporting businesses and applies to all employment sites outside of SIL.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		existing/ potential occupiers are taken into account.		Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
E2/13	E2	Policy E2 should set a quantum/target or ask for significant proportion of affordable workspace provision.	2	London Borough of Brent; ACAVA	No change proposed. E3 requires an appropriate quantum of affordable workspace which would be assessed on a case by case basis. This provides flexibility to determine the most suitable approach as, in some cases, the delivery of small business units may be more appropriate. OPDC may consider providing more detail on implementing this policy this as part of preparing an Affordable Workspace SPD. An SPD could be updated more regularly than a Local Plan document.

Policy E2: Supporting Small Business

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E3/1	E3	Should provide space for workspaces and particularly for start-ups, artists and makers.	1	ArtWest; Hammersmith Society	Noted. The Employment policies seeks to secure and a range of workspaces, including affordable, shared and small business units. Policy E1 and E2 also support the delivery of workspaces that help meets needs of

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					identified growth sectors, including the creative sectors.
E3/2	E3	Support Policy E3	1	ArtWest	Noted. The objective to support small businesses is still reflected in the amended Policy E3.
E3/3	E3	Low cost or "sub-market" should be more clearly defined and should include more information on how this will be remain affordable over the long term		ACAVA	Noted. What is considered 'affordable' could vary by use and over time so more information would be required in order to define this clearly. OPDC may consider this as part of preparing an Affordable Workspace SPD which can be updated more regularly than a Local Plan document. The supporting text for policy E3 has been amended to clarify the arrangements for securing affordable workspace via a legal agreement.
E3/4	E3	Policy should be clearer on "appropriate locations" for affordable workspaces.		London Borough of Ealing	No change proposed. Policy E3 does not preclude any locations for affordable workspace. OPDC wishes to encourage the principle of this type of development and by identifying appropriate locations it may serve to weigh against delivery in other areas which may be acceptable. Any proposals within SIL would need to be in accordance with Policy E1.
E3/5	E3	Concerned about the requirement for the approval of workspace or studio providers and consider that rent and tenancy matters		DS2 (on behalf of Old Oak Park Limited); CBRE (on behalf of SEGRO)	Change proposed. The policy is seeking to ensure that any agreed or intended objectives will be met and effectively monitored, therefore some certainty is required about who and how the space will

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		should not be controlled through the planning system.			be managed over time. Approved workspace providers would help provide evidence of this, however, the text has been amended to clarify that an approved Management Scheme could achieve the same objective. Supporting text to Policy E3 has also been amended to clarify that the arrangements for affordable workspace including the quantum, type, rent levels, management and timescales will be secured via a legal agreement. References to the 1954 Act have been removed.
E3/6	E3	Cost of capped rents will need to be accounted for in viability evidence		DS2 (on behalf of Old Oak Park Limited)	No change proposed. The Whole Plan viability study has tested the cumulative impact of the policies in the Local Plan. Policy DI1 makes it clear that, OPDC will appropriately balance the priorities for a range for contributions, this would include any requirements for affordable workspace. This would be assessed on a case by case basis.
E3/7	E3	The lack of detail on who will support small businesses makes this narrative unsound.		Friary Park Preservation Group	No change proposed. Policies SP5, E1 and E3 support the provision of small business units which can be used by small or start-up businesses. Applicants for planning permission will need to demonstrate how they are meeting these policies.
E3/8	E3	Support provision for small businesses	15	Hammersmith Society; Harlesden Lets; Grand Union Alliance, Wells	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
E3/9	E3	Low cost/low rents are usually an essential ingredient for small businesses.	14	Hammersmith Society; Harlesden Lets, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy E3 supports the provision of affordable workspace under a number of circumstances, including those offered at below market rents and if this involved the change of use of existing buildings, as long as all other relevant planning policies were met.
E3/10	E3	Policy should require a range of tenures. Management by an approved workspace provider is in conflict with policy requirements for the reprovision of existing employment workspace	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	Change proposed. The policy is seeking to ensure that any agreed or intended objectives will be met and effectively monitored, therefore some certainty is required about who and how the space will be managed over time. Approved workspace providers would help provide evidence of this, however, the text has been amended to clarify that an approved Management Scheme could achieve the same objective.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
E3/11	E3	Examples of artist studios in Old Oak area and their potential role in the future of Old Oak should be acknowledged.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The supporting text has been updated to include reference to a well established network of artist studios, rather than listing individual studios to avoid the information becoming out of date.
E3/12	E3	Concerned about the requirement for the approval of workspace or studio providers and consider that rent and tenancy matters should not be controlled through the planning system.		DS2 (on behalf of Old Oak Park Limited); CBRE (on behalf of SEGRO)	Change proposed. The policy is seeking to ensure that any agreed or intended objectives will be met and effectively monitored, therefore some certainty is required about who and how the space will be managed over time. Approved workspace providers would help provide evidence of this, however, the text has been amended to clarify that an approved Management Scheme could achieve the same objective. Supporting text to Policy E3 has also been amended to clarify that the arrangements for affordable workspace including the quantum, type, rent levels, management and timescales will be secured via a legal agreement. References to the 1954 Act have been removed.

Policy E4: Work Live Units

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E4/1	E4	Restrictive nature of Policy E4 is supported.		London Borough of Ealing	Noted.
E4/2	E4	Support E4.	16	ACAVA; Art West; Hammersmith Society; Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
E4/3	E4	Low value live-work units in high value areas will not be deliverable. Live-work units should be permitted in a range of tenures, within SIL, on the edge of SIL designations adjacent to residential areas, be allowed for residential reversion and	15	Old Oak Interim Neighbourhood Forum; Grand Union Alliance; Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the ongoing demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. This approach to protecting land for employment is consistent

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		identified as a potential meanwhile use		Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	with national policy guidance and the London Plan. Live work accommodation is intended to help provide affordable workspace for start-up businesses so the tenure should reflect this. Policies E4 and TCC9 do not prelude work-live units being proposed as meanwhile uses provided they satisfy the criteria within policy TCC9 and other relevant polices in the Local Plan.
E4/4	E4	Should include more policy criteria/detail related to how to manage noise and air quality in work live units, and the need for different tenures, number of bedrooms, open space, social infrastructure	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. As a minimum, the environmental performance criteria for these units (including air quality and noise) should be the same as residential units, but the measures necessary to achieve those criteria may have to be more robust. This has been clarified in the text. These environmental issues will be addressed on a site-by-site basis and controls imposed on planning permissions where necessary. Specific controls for issues such as operating hours will be considered on a case-by-case basis because the degree of control will depend on the circumstances of each case. Policy H2 will ensure that a wide range of housing options are available within the OPDC area, including a mix of different size homes. Live work

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					accommodation is intended to help provide affordable workspace for start-up businesses so the size of units should be driven by needs from this part of the market as would be assessed by E4 part a). The supporting text for E4 refers to measures necessary to ensure that work-live units support business activity and to avoid the units reverting to full residential use in the future.

Policy E5: Local Access to Training, Employment and Economic Opportunities

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E5/1	E5, Para 9.39	Clarity is required in relation to section 106 training, employment and opportunities obligations. There is the potential for requirements to be too onerous if not clearly defined	1	DS2 (on behalf of Old Oak Park Limited)	Change proposed. The supporting text has been amended to clarify that this meant the end use of the development. The policy and supporting text describe the principles which should be considered, but the detailed measures need to be developed by applicants as part of their Local Labour, Skills and Employment Strategy and Management Plans.
E5/2	E5	Support E5 but opportunities should be available to local people who live outside of the OPDC area	1	Royal Borough of Kensington and Chelsea	No change proposed. Policy E5 does not refer to relevant boroughs and therefore does not exclude local people who live outside of the OPDC area

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
E5/3	E5	Support for local training, employment and economic opportunities. Existing employment opportunities should be retained in the local area and for local people. Emphasis should be given to supporting existing businesses, young people, start-ups and training	15	London Borough of Hammersmith and Fulham; Hammersmith Society; Harlesden Lets, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The supporting text to Policy E5 includes detailed information on how LLSESMP should provide for local jobs as well as training and business opportunities. Policy E3 also requires an appropriate quantum of affordable, shared and/or small business units to support small and start-up businesses.
E5/4	E5	All developments should have a LLSESMP. Policy requirements should be clarified, expanded and strengthened to include maintaining job numbers and monitoring arrangements. Development should mitigate socio-economic, transport and environmental impacts	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Major development is defined in the Glossary for the Local Plan. The major development threshold reflects the fact that LLSESMPs will only be effective where developments are expected to generate a sufficient amount of employment to justify a plan being agreed. However, policies E1 and E2 will help protect existing and deliver new employment uses and therefore will also make a general contribution to supporting the delivery of jobs in the area. The supporting text already makes it clear that an LLSESMP will be secured via a legal agreement, this would include monitoring measures.

10: Town Centre and Community Uses Chapter

TCC1: Locations for Town Centre Uses

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC1/1	TCC1	TCC1 part e) is not in conformity with the London Plan as it allowed Town Centre uses within SIL, leading to incremental erosion of SIL.	2	Ealing Council, Mayor of London	Change proposed. The policy for town centre uses in SIL has been revised to more closely align with the requirements of the London Plan - that being that uses should be small-scale walk-to services such as small creches and cafes.
TCC1/2	TCC1	Broadly support Policy TCC1	1	Royal Borough of Kensington and Chelsea	Noted.
TCC1/3	TCC1	The policy is not sound as no mention is made in Policy TCC1 of the need to assess potential impacts of town centre uses on neighbouring centres, particularly Harlesden, as indicated in the Retail and Leisure Needs Study (para 8.1.10).	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The requirements for a Harlesden Enhancement Strategy were set out in the revised draft Local Plan Place policies for Old Oak South, Old Oak North and Willesden Junction and was referenced in the supporting text to Policy TCC3. However, OPDC concurs that these requirements would be clearer if included in Policy TCC1. The requirements for potential enhancements to Harlesden have therefore been relocated into this policy.
TCC1/4	TCC1	The only statement in Chapter 10 concerning the potential impact on Harlesden is made in TTC3(f) A Class Uses and supporting text 10.22 and 10.23. However, this policy and these text paragraphs	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender,	Change proposed. The requirements for potential enhancements to Harlesden have been relocated to TCC1. The supporting text recognises that the RLNS identifies that Harlesden is likely to be most impacted by regeneration, but that there are also opportunities for the centre to capture spend from the new population and that these

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		refer to town centre uses in general and not to A-class uses specifically. This should be relocated to TCC1 and a statement about the nature of Harlseden town centre, its contribution to meeting the needs of existing residents, and its potential to play a role in and benefit from the developments in the OPDC area, as well as to be potentially negatively impacted by these developments should be made here		Jeremy Aspinall, Thomas Dyton	opportunities should be explored through the Harlesden Enhancement Strategy.
TCC1/5	TCC1	The general London Plan aim of "managed growth" for Harlesden should be included here, noting the commitment then of the London Plan to enhance the quality and diversity of shops and to safeguard traditional retail uses	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Harlesden Town Centre is not within the OPDC boundary. While it is appropriate to make broad reference to the centre when referring to the Harlesden Enhancement Strategy, the planning policy for the future of centre should be set through LB Brent's Local Plan.
TCC1/6	TCC1	A clear statement is needed concerning what the potential damage to	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts,	No change proposed. The Retail and Leisure Needs Study identifies that Harlesden Centre will undergo growth over the next 20 years,

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Harlesden of OPDC development might be across the range of town centre uses, thus in every TCC policy section, and what effective mitigation is required.		Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	both as a result of background growth, and also as a result of expenditure from the OPDC area. Within OPDC's Retail and Leisure Needs Study, estimates for floorspace provision within the OPDC area have been made on the basis of 80% retention of convenience expenditure and 20% retention of comparison expenditure, meaning there will be significant opportunities for Harlesden to capture this growth. Enhancements to Harlesden are therefore likely to be focussed more on opportunities to capture growth rather than to mitigate impacts. Consideration would of course need to be had to the Section 106 tests. Regardless, OPDC does not consider it appropriate to fix not what sort of measures will be required to support Harlesden. There will be a need for flexibility to consider what measures may be required to mitigate any impacts.
TCC1/7	TCC1	Need a stronger consideration of how neighbouring areas will shape the plans for the OPDC area in respect of town centre uses	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender,	No change proposed. The Retail and Leisure Needs Study factored in background growth and known planned expansions to town centres to inform the recommendations in the study.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Jeremy Aspinall, Thomas Dyton	
TCC1/8	TCC1	A more detailed breakdown of potential commercial floorspace by location, including clusters, should be provided	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The place policies have indicative jobs targets, but there needs to be a degree of flexibility over which particular sector these jobs are provided within. The amount of floorspace within different B-class uses, D-class uses and within use class C1 will need to be treated flexibly by place and cluster. Site allocations also have indicative floorspace and jobs targets. Table 10.1 does set out indicative A-class use figures, based on current population projections and estimates of expenditure retention.
TCC1/9	TCC1, Figure 10.2	There is a discrepancy between Figure 10.2 and the Policies Map in the depiction of Old Oak High Street at Willesden Junction	1	Harlesden Neighbourhood Forum	Change proposed. The policies map has been altered to align with Figure 10.2.
TCC1/10	TCC1	The threshold for a Harlesden Enhancement Strategy should be 2,500 sq m as this is the level of development that the NPPF states should be the default level for impact assessment where a level has not been set.	1	Harlesden Neighbourhood Forum	No change proposed. The rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments. The Study has assessed the broad impact of a new centre on the

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					surrounding town centre hierarchy and this has shown that most impacts are likely to be positive as a consequence of the ability of surrounding centres to capture spend from the new population moving to the area.
TCC1/11	TCC1	Care should be taken that sequential test in TCC1 does not allow proliferation of retail uses surrounding SIL.		London Borough of Ealing	Change proposed. Policy TCC1 has been amended to ensure the sequential approach does not undermine the function of SIL.

Policy TCC2: Vibrancy

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC2/1	TCC2	Support approach to controlling hot food takeaways	17	NHS Brent CCG, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyto	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC2/2	TCC2	Support seeking to control take-aways around schools as there is clear evidence linking the proliferation of fast food outlets to childhood obesity.	17	Mayor of London, London Obesity Leadership Group, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
TCC2/3	TCC2	Policy should consider increasing distance of control around primary schools to 400m	2	London Obesity Leadership Group, Hammersmith and Fulham Council	No change proposed. OPDC's Healthy Town Centre Study shows a 400m restriction around both primary and secondary schools would exclude almost all of the OPDC Area including the whole of the planned Old Oak Major Town Centre and therefore, the Old Oak Major Town Centre would not provide any hot food takeaways. This would be considered unreasonable and OPDC recognise the value of hot food takeaways to the economy, food choice and the need for a balanced approach in order to create a vibrant and healthy town centre

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC2/4	TCC2	Support policy seeking to limit over-concentration of hot food take-aways in centres	17	Mayor of London, London Obesity Leadership Group, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
TCC2/5	TCC2	Support requiring schemes to operate in compliance with the Healthier Catering Commitment scheme	2	London Obesity Leadership Group, Hammersmith and Fulham Council	Noted.
TCC2/6	TCC2	Policy should require organisations to operate in compliance with the Governments Food Buying Standards	2	London Obesity Leadership Group, Hammersmith and Fulham Council	Change proposed. The policy has been revised to encourage developers to operate in compliance with the Government's food buying standards.
TCC2/7	TCC2	Support approach to managing betting shops, pawnbrokers, payday loan stores and games arcades	3	Mayor of London, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council	Noted.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC2/8	TCC2	Support Policy TCC2	1	Friary Park Preservation Group	Noted.
TCC2/9	TCC2	Consideration should be given to the impact on neighbouring town centres	1	David Craine	No change proposed. This is dealt with in TCC1.
TCC2/10	TCC2	The vibrancy policy is aspirational, with no evidence that schemes in North Acton can be activitated, despite a cluster of high density buildings	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Schemes in North Acton were implemented in advance of OPDC's production of the Local Plan.
TCC2/11	TCC2	TCC2c) seems to be missing a 'not'	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The word 'no' has been deleted to make the policy effective.
TCC2/12	TCC2	This policy is not sound as it conflicts with TCC3f) and requirement to mitigate impacts on Harlesden. Additional policy text should	13	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. Impact Assessments are required where they meet the thresholds set out in Policy TCC1. There is not a need to repeat this requirement within this policy.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		be inserted, stating that on applying for change of use, assessment of the impact on neighbouring town centres will be required, and planning permission will be subject to that assessment.		Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC2/13	TCC2	Concerned that this policy will result in more concentration of these uses in neighbouring areas like Harlesden. This consequence needs to be mitigated against in consultation with LBB and Harlesden Neighbourhood Forum and this need for mitigation in neighbouring areas should be reflected in supporting text.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Brent Council is responsible for producing planning policy for Harlesden. Brent Council has its own policy to control hot food takeaways in Brent.

Policy TCC3: A-Class Uses

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC3/1	TCC3, Table 10.1	Table 10.1 should be included in the policy and proposals should be required to accord with this quantitative need.	1	Brent Council	No change proposed. As noted in the supporting text to Policy TCC3, the figures in Table 10.1 are estimates based on current development capacity figures, population projections and estimates of expenditure retention. The policy requires that regard is had to the most up-to-date Retail and Leisure Needs Study and its recommended distribution of A-class floorspace across the area.
TCC3/2	TCC3	Not sure how the 5,000sqm threshold for impact assessments has been arrived at. It is considered as a maximum the threshold should be 2,500sqm, reflective of the default standard in the NPPF.	14	Brent Council, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments. The Study has assessed the broad impact of a new centre on the surrounding town centre hierarchy and this has shown that most impacts are likely to be positive as a consequence of the ability of surrounding centres to capture spend from the new population moving to the area.
TCC3/3	TCC3	Support the broad aim to promote small units but should not stipulate a % target	1	Old Oak Park Ltd	No change proposed. OPDC considers it appropriate to set a clear target for the delivery of small units, to support the establishment of independents and start-ups and to add variety, vibrancy and vitality to

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					the centre. OPDC considers the approach sound, in that it is justified by evidence and the inclusion of a target is an effective way of securing delivery.
TCC3/4	TCC3, Table 10.1	Broadly quantitative provision figures in table 10.1	1	Royal Borough of Kensington and Chelsea	Noted.
TCC3/5	TCC3	Support threshold of 5,000sqm for Town Centre Uses Statement in Old Oak High Street major town centre	1	Royal Borough of Kensington and Chelsea	Noted.
TCC3/6	TCC3, para 10.22	Support wording in para 10.22 for greater need of scrutiny of town centre uses in emerging town centres.	1	Royal Borough of Kensington and Chelsea	Noted.
TCC3/7	TCC3	Support threshold of 2,500sqm for town centre uses elsewhere	1	Royal Borough of Kensington and Chelsea	Noted.
TCC3/8	TCC3	Support Policy TCC3	1	Friary Park Preservation Group	Noted.
TCC3/9	TCC3	Policy TCC3 is unsound (no reasons given)	1	Chris Billington	No change proposed. No reasons are given as to why the policy is considered unsound.
TCC3/10	TCC3	Do not support trying to have predominantly A1 uses in primary shopping areas. This can result in multiple vacancies. A more flexible approach should be adopted, as has been adopted for shopping parades in the St.	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender,	No change proposed. OPDC considers it appropriate to specify that shop units should be focussed within primary shopping areas as these units tend to generate the greatest footfall and benefit from clustering, particularly for comparison trade. Neighbourhood Town Centres are much larger than shopping parades and in

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		Quintin and Woodland Neighbourhood Plan.		Jeremy Aspinall, Thomas Dyton	accordance with the NPPF, OPDC considers it appropriate to define primary shopping areas and that these should be the focus for A1 shops.
TCC3/11	TCC3	The policy is not sound as it does not solely deal with A-class uses. It does not have an implementation strategy so is not effective. It is not positively prepared as it does not reflect evidence base and mention the potential negative impact on Harlesden in the RLNS	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The elements dealing with 'town centre' uses which could also include non A-class uses has been relocated to Policy TCC1. OPDC considers that the elements that remain in the policy are sound and effective.
TCC3/12	TCC3	This strand of the policy should be relocated to TCC1 as it does not solely relate to A-class uses.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. This has been relocated to Policy TCC1.
TCC3/13	TCC3	Special consideration should be given to the retail uses planned for the Willesden Junction place, Hythe Road and Scrubs Lane, which will	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. The specific occupiers of A1 premises within a use class cannot be controlled through the planning system, although the requirement to submit a vision statement as part of a Town Centre Uses Statement is so that OPDC and stakeholders

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		be in close proximity to Harlesden		Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	are able to broadly understand the types of uses that may be located within the OPDC area. The Retail and Leisure Needs Study identifies that Harlesden Centre will undergo growth over the next 20 years, both as a result of background growth, and also as a result of expenditure from the OPDC area. Within OPDC's Retail and Leisure Needs Study, estimates for floorspace provision within the OPDC area have been made on the basis of 80% retention of convenience expenditure and 20% retention of comparison expenditure, meaning there will be significant opportunities for Harlesden to capture this growth.
TCC3/14	TCC3	The character of retail uses in Old Oak North and Willesden Junction could negatively impact on Harlesden Town Centre. As such a lower threshold for retail impact assessments in areas of Old Oak North should be incorporated	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The impact of a quantitive provision of over 60,000sqm of A-class floorspace has already been assessed as part of OPDC's Retail and Leisure Needs Study and this has shown that Harlesden Town Centre is set to benefit from the expenditure arising from residents and workers in Old Oak. OPDC requires schemes meeting the thresholds outlines in TCC1 to contribute, where appropriate, to measures that will support the continuing vitality and viability of Harlesden District Centre to explore how these benefits can be appropriately captured. OPDC does not consider it appropriate to lower these

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					thresholds. The rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments.
TCC3/15	TCC3	There is no policy that requires individual development proposals not to have an unacceptable impact, either by themselves of cumulatively with other developments, upon existing town centres. Policy should state that where it is likely to have a significant adverse impact on the vitality and viability of an existing centre it will be refused.	14	Grand Union Alliance, Harlesden Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. To make it clearer that the requirements of TCC1 are to avoid significant adverse impacts to OPDC's and the surrounding town centre hierarchy, this has been added to the lead in text to Policy TCC1. The Retail and Leisure Needs Study has looked at the impact of proposed levels of A-class floorspace provision on the surrounding town centre hierarchy and this has shown that the impact is likely not be adverse and that there are significant opportunities for surrounding centres to capture trade from the new population in the OPDC area. The NPPF requirement for impact assessments is to look at existing, committed and planned proposals and therefore, recognises the need to consider impacts cumulatively with other committed or planned proposals. Reference to this has been included in the supporting text.
TCC3/16	TCC3	If cumulative individual and smaller applications will have	13	Grand Union Alliance, Wells House Road Residents	No change proposed. While it was part of PPS4, the NPPF doesn't have a cumulative

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		a significant effect on Harlesden and other neighbouring centres, provision for an impact assessment across co-located or multiple-site applications should be made. Policy TCC1 should state that development proposals should not have an unacceptable impact, either by themselves of cumulatively with other developments, upon existing town centres.		Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	impact test, requiring schemes below locally set impact assessment thresholds to submit impact assessments. There's a requirement for schemes over the default threshold to take account of cumulative developments in testing impact, but if the scheme is under the threshold in the first place, there is no cumulative trigger for undertaking an assessment. OPDC therefore considers the policy approach sound and consistent with the NPPF.
TCC3/17	TCC3	An early published version of the RLNS, in February 2016, concluded that there was a threat to Harlesden based on a total new A Class floorspace in the OPDC area of 64,100 sq metres up to 2037. The total new A Class floorspace has now risen to 68,500 sq metres in the latest published version of the Study (Nov 2016). This impact is now surely greater.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The impact assessments in the Retail and Leisure Needs Study have been updated to assess the impact with the revised development projections within an addendum. However, the figures have subsequently been further updated in the Retail and Leisure Needs Study addendum and the figures have subsequently returned to 64,500sqm. The impacts on centres have been assessed and this has shown that there is significant potential for the surrounding hierarchy to capture trade from spend arising from the new population within the OPDC area.

Comment reference	Section of Local Plan comments relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC3/18	TCC3	Need to set out how the diagrams showing active frontage are reflected in the estimates of town centre floorspace.	14	Grand Union Alliance, Harlesden Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Active frontages do not solely relate to A-class uses - they can include other town centre uses. The annex of the Local Plan notes that figures (maps) in the Local Plan are indicative.

Policy TCC4: Social Infrastructure

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/1	TCC4	Need to address current problems with access to health before development can proceed.	1	Michael Hangyal	Change proposed. The duty to provide health facilities for existing residents falls on the local councils (in their role as public health providers), NHS and CCGs. OPDC's responsibilities through the Local Plan are to support any proposals to increase health provision to support the achievement of this. Further wording has been inserted into the policy to support the provision of such facilities, subject to them meeting local needs and subject to them according with other relevant policies.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/2	TCC4	Welcome the positively planned approach to social infrastructure	1	Mayor of London	Noted.
TCC4/3	TCC4	Need to provide space for nurseries and general support for D1 space.	1	Susannah Abeysekera	Change proposed. Further wording has been inserted into the policy to support the provision of new or enhanced social infrastructure facilities (including nurseries), subject to them meeting local needs and subject to them according with other relevant policies. Nursery space is recognised as a form of social infrastructure in Figure 10.5. OPDC's Infrastructure Delivery Plan sets out the requirements for nursery provision.
TCC4/4	TCC4	Policy only makes passing mention on co-location with housing and other social infrastructure, as per the GLA Social Infrastructure SPG	1	Ealing Council	No change proposed. The policy requires co-location where appropriate and feasible. Further supporting text sets out the rationale for this.
TCC4/5	TCC4	Suggest; 'in locations that are highly accessible to the populations that they serve…' The strategy for the provision of health services in particular may well mean that they are designed to serve people who travel further than the 'existing and new communities in the area'.	1	Ealing Council	Change proposed. Amendments have been made to the policy to incorporate this text.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/6	TCC4	The scale of social infrastructure burden on the Old Oak Park site is significant and disproportionate, but it is recognised that para 10.27 notes the potential for retrospective pooling contribution.	1	Old Oak Park Ltd	Change proposed. Further detail on the approach to retrospective pooling mechanisms has been included in SP10 and is already included in the relevant supporting text of the place policies.
TCC4/7	TCC4	Consider that a 2/3FE primary will be sufficient to meet needs and a 4FE primary will be too large and challenging to accommodate on the site. Not all schemes are unlikely to deliver 50% affordable housing and 25% family housing, meaning projections are worst case	1	Old Oak Park Ltd	No change proposed. OPDC's modelling shows the need for a 4FE primary school based on the policy requirements of the Local Plan, but the supporting text to Policy TCC4 recognises that the identification of appropriate on-site provision of social infrastructure is based on current assumptions on affordable housing, family housing and on the likely phased delivery and capacity of sites. As development proposals come forward OPDC will gain greater certainty about the required needs for social infrastructure, meaning the requirements for social infrastructure are likely to change over time. OPDC will monitor delivery on an ongoing basis, to ensure that the facilities proposed are the right size to meet needs. Any changes to the size requirements for the social infrastructure outlined would need to be agreed by OPDC and the relevant service provider.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/8	TCC4	Requirement for revenue funding is unnecessarily onerous and should be removed from the Local Plan	1	Old Oak Park Ltd	No change proposed. The requirement for revenue funding would only be in circumstances where an element of subsidy is necessary and appropriate. In the past, examples of this have been securing peppercorn rents for certain community facilities.
TCC4/9	TCC4, para 10.37	Requirement for large-scale social infrastructure should not be considered as a catalyst use unless the proposal is for social infrastructure not required by the Local Plan	1	Old Oak Park Ltd	Change proposed. This has been clarified in the supporting text.
TCC4/10	TCC4	Support and agree with the proposed approach to healthcare provision and expansion of existing facilities in early phases and delivery of one on-site health facility to meet the needs of development	1	HUDU	Noted.
TCC4/11	TCC4, para 10.35	Support the recognition for flexibility in the delivery of social infrastructure as outlined in para 10.35	15	HUDU, Hammersmith Society, Education and Skills Funding Agency, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC4/12	TCC4	Support approach to securing contributions, where necessary, towards management and maintenance costs	1	HUDU	Noted.
TCC4/13	TCC4	Need to consider a number of site options for the provision of the health centre, including within Old Oak South	1	HUDU	No change proposed. The provision of the health centre has been modelled against OPDC's development trajectory and the available sites have been assessed against criteria to derive the best site for the delivery of the health centre. However, the supporting text to the policy recognises that given the timescales over which the plan is proposed and the complexity of delivery, there is a need for a degree of flexibility in the approach to on-site provision of social infrastructure. It is therefore likely that the place specific requirements for schools and health facilities in particular will need to be kept under regular review, particularly for facilities identified within later development phases. In recognition of this need for flexibility, on-site facilities may be located on alternative sites if this is agreed by OPDC and service providers.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/14	TCC4	Emphasis of TCC4a) is broadly supported but it should recognise the need to support the transformation of NHS services where flexibility is required to make best use of its current estate and dispose of surplus sites for housing.	1	HUDU	No change proposed. The policy requires that any proposal for the loss of social infrastructure ether requires its reprovision, or that the premises has been competitively marketed without success for other forms of infrastructure and that the loss of the facility would need result in a shortfall of provision for the population that it serves.
TCC4/15	TCC4	Support policy TCC4	15	Royal Borough of Kensington and Chelsea, Old Oak Interim Forum, Education and Skills Funding Agency, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
TCC4/16	TCC4	Text should acknowledge that it is essential that the needs of the OPDC area are met in full by new facilities within the area to ensure that there is no drain on the existing social	1	Royal Borough of Kensington and Chelsea	No change proposed. OPDC is not proposing that needs are met fully by new facilities and that opportunities should be taken to expand existing facilities if feasible. The most up to date requirements associated with this are included within OPDC's Infrastructure Delivery Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		infrastructure outside the OPDC area			
TCC4/17	TCC4	Broadly support TCC4a) but should be clearer as to what factors are considered to demonstrate that there is no longer a need and should require replacement facilities to be of the same or higher quality	1	Hammersmith and Fulham Council	Change proposed. Amendments have been made to require facilities reprovided to be of the same or higher quality. Additionally, the policy has been amended to set out the factors that are considered to demonstrate there is no longer a need.
TCC4/18	TCC4	Need to set out what factors would be considered to be unacceptable on the residential amenity of transport network	1	Hammersmith and Fulham Council	Change proposed. This policy strand has been removed as OPDC considers that this could give too much flexibility to allow for the loss of social infrastructure.
TCC4/19	TCC4	Do not support proposed location of the secondary school as it appears to be far from houses	1	Friary Park Preservation Group	No change proposed. The location of the school is close to the areas of planned housing development. The site was assessed against a number of criteria to derive the best location and this included proximity to housing, particularly family housing.
TCC4/20	TCC4	OPDC should specifically understand the need for places of worship rather than lumping them in with community facilities.	14	Diocese of London, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine	Change proposed. The supporting text has been revised to reference that the community hub should include faith space. The floorspace requirements for community space identified in OPDC's Social Infrastructure Needs Study and Infrastructure Delivery Plan acknowledges

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	that a variety of community spaces will need to be provided, including faith space.
TCC4/21	TCC4	Insufficient attention has been given to social infrastructure. In the previous draft of the Local Plan it had its own chapter whereas now it only has one policy.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Representations were received on the 1st draft Local Plan stating that there was a lot of repetition between social infrastructure policies. OPDC agreed and to avoid repetition, the requirements have been merged into one policy. OPDC considers the policy to be sound and to appropriately address the needs of all types of social infrastructure.
TCC4/22	TCC4	Existing social infrastructure provision is inadequate and needs to be considered together with planning for new residents. The local police station is closing, people are finding it difficult to register with their GP and other health services are being closed.	14	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The provision of social infrastructure provision to meet existing needs is a matter for the service provider. However, OPDC has inserted policy wording that supports the provision of new or enhanced social infrastructure where it can be demonstrating it meets local needs and where it accords with other relevant planning policies. The supporting text clarifies that this includes support for facilities that better meet the needs of the area's existing population.
TCC4/23	TCC4	Need to safeguard land now for schools as they are demanding of space	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. The locations for schools have been identified in the Infrastructure Delivery Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC4/24	TCC4	In view of the increase in population, hospital services (Middlesex and Hammersmith), Health Centres, and GP services should be retained and expanded, and any closures of existing facilities prevented	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. How the NHS plans for health provision is ultimately a matter for the NHS, but as planning authority, OPDC would need to be satisfied that any loss of health facility would not result in a shortfall in provision for the population that it serves and that competitive marketing has been undertaken for a period of at least 12 months for alternative forms of social infrastructure without and appropriate offer being received.
TCC4/25	TCC4	Need to set out more clearly how community facilities will be paid for and how they will be managed	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The plan needs to maintain a degree of flexibility about management arrangements. In relation to costs, the policy sets out that contributions will be sought from development, but in accordance with Policy DI1, alternative sources of funding may also be pursued.
TCC4/26	TCC4	Support the co-location of social infrastructure	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC4/27	TCC4	Concerned that given the infrastructure burden, provision of social infrastructure will be constrained	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is working proactively with service providers to identify ways of securing funding for social infrastructure delivery. These mechanisms have been alluded to in the supporting text to Policy DI1. It includes measures such as direct funding from the service providers, which for instance is the case in relation to the EFA and delivering free schools.
TCC4/28	TCC4	More social infrastructure facilities have been added but the DIFS viability work has not been updated	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan is supported by a Whole Plan Viability Study which assesses the deliverability of its policy requirements. OPDC's IDP identifies the costs of infrastructure, where known.
TCC4/29	TCC4	Social infrastructure as planned for by OPDC is not comprehensive, e.g. it does not include faith facilities or facilities specifically for children and young people,	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	Change proposed. Text has been added to the supporting text to clarify that community space to meet the needs of development should provide a variety of functions including public toilets, halls for hire, youth space and faith space.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		and lacks precision within policy and certainty over long-term resourcing		Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC4/30	TCC4	Where there is no longer an identified use of the facility (a) i), the suitability of premises for other forms of social use (including community ownership) should always be considered. This should be included in the policy.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The policy has been amended to require marketing of the premises for alternative forms of social infrastructure in any scenario where the applicant is proposing to redevelop and not reprovide the facility.
TCC4/31	TCC4	OPDC are proposing limited allocation of CIL monies in the Preliminary Draft Charging Schedule	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's IDP identifies the need for new or enhanced social infrastructure to meet needs. If facilities are not identified on the Regulation 123 List this is to provide for the possibility for enhancements or new facilities to be secured through planning obligations and/or other funding sources.
TCC4/32	TCC4	Policy should provide an expectation of support for retention of existing social infrastructure, similar to the protection given to artist space in TCC5c)	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. The policy wording for TCC5c refers to 'supporting the retention' but then Policy TCC5c) cross-references to Policies E1-E3 in the employment chapter. These policies seek to ensure that new developments deliver appropriate

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	units/floorspace to enable current occupiers to relocate. Policy E2 requires robust engagement with current occupiers will be required; however, ultimately OPDC can only secure the floorspace and in accordance with Policies E1, E2 and E3, seek to ensure it is appropriate to potential existing occupiers. If there was not an interest in an artist filling the space, there is the ability for other occupiers within the B-use class to occupy the space. The social infrastructure policy does seek to protect social infrastructure facilities, but they differ slightly in that they are providing a service to meet needs. If there is no longer a demonstrable need for that service and it has been competitively marketed for alternative social infrastructure uses without success, there needs to be a policy mechanism to allow for its alternative use.
TCC4/33	TCC4	Should set out an expectation that planning gain will be available to support protection of existing and deliver new social infrastructure to ensure continuity of provision and support for existing and new residents	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Planning contributions need to satisfy the S106 tests, being necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. It can therefore be used to provide new infrastructure or expand existing infrastructure to meet the needs of development. The need for this is covered in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					TCC4. In terms of better meeting the needs of existing residents, planning contributions cannot be reasonably used for this and the responsibility to meet current needs rests with the service provider; however, the policy has been revised to give stronger support for enhancements to existing or new social infrastructure facilities that meet the needs of the existing population.
TCC4/34	TCC4	Should set out a commitment to the timely construction of a local list of community and heritage assets in consultation with residents groups	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC has undertaken consultation on a Local List of heritage assets. It is not clear what is meant by a list of community assets. Community groups can apply for premises to be listed as Assets of Community Value. Any application must be made to the host local authorities rather than to OPDC.
TCC4/35	TCC4, para 10.37	Fig 10.8 cited in para 10.37 could not be found.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. This is an erroneous reference and should have referenced Figure 4.19

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC4/36	TCC4	Concern with the in-built flexibility in the approach to on-site health provision, NHS reduction in hospital beds, A+E closures and CCG proposals for one large health hub	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC must support the requirements of the CCGs. However, the policy recognises the need for flexibility and that alternative arrangements for the provision of social infrastructure that differs from the provision outlined in the Local Plan and IDP can be agreed with OPDC and the relevant service provider. In terms of existing provision, the policy has been revised to provide stronger support for social infrastructure facilities that help to better meet the needs of the existing population.
TCC4/37	TCC4	Additional health facilities should be built prior to or as new developments are approved	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Facilities cannot be built in advance of approvals as there will not be sufficient planning contributions to pay for the expansions. Triggers for payments are agreed on a scheme by scheme basis within Section 106 agreements. CIL payments are made on commencement of each phase.
TCC4/38	TCC4	Existing schools are under pressure and there is little room for expansion. Some people are having to travel long distances to school	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender,	Noted. The Education and Health Needs Study has factored current school provision and capacity into the modelling. OPDC is not the local educational authority and responsibility for meeting the needs of existing residents remains with the local authorities, but Policy TCC4 supports the provision of new and/or enhanced social

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Jeremy Aspinall, Thomas Dyton	infrastructure facilities that better meet the needs of the area.
TCC4/39	TCC4	The secondary school allocated for North Acton may prove inadequate given that catchments are dynamic and change over time	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC needs to ensure that the needs of development are appropriately met within the OPDC area. However, in accordance with the Duty to Cooperate, OPDC has been and will continue to work with the surrounding local authorities to understand if there is a need for the OPDC area to also provide educational facilities that help to meet growth wider than solely within the OPDC area. However, at this stage no need has been identified.
TCC4/40	TCC4	Should identify sites for the delivery of schools that meet the needs of development in appropriate timescales	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan does identify sites for the delivery of schools to meet the needs of development. Details on timescales are included in OPDC's IDP.
TCC4/41	TCC4	Further and higher education, linked to training and apprenticeships, should be provided for in TCC4.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. Further and higher education are identified as social infrastructure in Figure 10.5 and in the glossary and are therefore covered in the policy. Further education requirements are dealt with in the IDP, which identifies that the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	secondary school should provide further education facilities. higher educational needs are not dealt with explicitly as provision tends to operate on a more strategic basis, but the policy supports the provision of new or enhanced social infrastructure, which could include higher education facilities, subject to it meet needs in the local area and subject to it according with other relevant planning policy.
TCC4/42	TCC4	Should clarify how ACV listings will be applied to social infrastructure	1	Pentecostal City Mission	No change proposed. ACVs are dealt with through legislation, which specifies that a building being a ACV is a material planning consideration when considering applications. OPDC does not consider that there is a need to re-state this legislation in a policy in the Local Plan.
TCC4/43	TCC4	A site for the all-through school should be identified in the Plan so that the opportunity to deliver it in future is not lost.	1	Harlesden Neighbourhood Forum	No change proposed. It is too difficult to predict sites likely to come forward in the longer term. The supporting text identifies that a facility is required and that its delivery would be secured through future iterations of the Local Plan.

Policy TCC5: Culture and Art

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC5/1	TCC5	Support securing contributions towards public art	1	Canal and River Trust	Noted.
TCC5/2	TCC5, para 10.41	Para 10.41 references the Mayor's Cultural Strategy, which is now out of date	1	Mayor of London	Change proposed. This has been updated to reference the new Mayor's draft Culture Strategy.
TCC5/3	TCC5	Support Policy TCC5	2	Friary Park Preservation Group, ArtWest	Noted.
TCC5/4	TCC5	Support retention of existing and provision of new artist space, but provision needs to be affordable	14	ArtWest, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The need for affordable workspace is set out in Policy E3, which the policy cross-references.
TCC5/5	TCC5, para 10.46	Support para 10.46	1	ArtWest	Noted.
TCC5/6	TCC5	The recommendation from the Cultural Principles document for a Cultural Action Plan to be submitted by large developments should be included in the Local Plan	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This requirement is included in TCC5.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC5/7	TCC5	Cultural facilities should be for the benefit of locals and Londoners rather than the international community	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan supports cultural facilities that meet identified needs. OPDC considers that the scale of land and the accessibility of the area means that cultural facilities could meet local and strategic needs. OPDC does not propose to set out that facilities that provide for the international community will not be supported. Any such use would however be likely to be a 'catalyst use' though and would therefore need to accord with the requirements set out in Policy TCC8.
TCC5/8	TCC5	Proposal for Science Museum on Cargiant site is unclear	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This is a proposal from a developer and is not something required as part of the Local Plan. The Local Plan seeks to support proposals for cultural uses, but maintains flexibility over which specific cultural uses should be provided.
TCC5/9	TCC5	In addition to contribution to the public realm through S106 agreements, the principle of providing or contributing to public art should also be considered	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. This requirement is dealt with in the 'and/or the provision of public art' point.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		as an obligation		Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC5/10	TCC5	Where there is no longer an identified use of the facility (a) (i), the suitability of premises for other forms of social use (including community ownership) should always be considered.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. It is not clear what is meant by 'social' use; however, community uses are in a separate use class and the Local Plan cannot require a cultural use (usually Use class SG or Use Class D2) to be marketed as a community use (Use class D1), before an alternative use can be considered. Community ownership of assets is dealt with in Policy DI3.
TCC5/11	TCC5	Should include 'provide inclusive access in terms of age, ability/disability and income'	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Inclusive access is dealt with in relation to all buildings and public realm through policies SP9 and D3.
TCC5/12	TCC5	Should use Section 106 money to support the growth of artists	1	ACAVA	No change proposed. The Local Plan identifies in Policy E3 that OPDC will look to secure low cost and/or open workspace and studios from developments. This will help support the growth of SMEs, including artists.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC5/13	TCC5	The plan should include space for an arts/community centre	1	ArtWest	No change proposed. The IDP identifies the need for two community hubs to meet the needs of the new population. There may be the potential to provide exhibition space as part of this or co-locate with artist space, in accordance with Policy TCC4. Policy TCC5 supports applications for new cultural space, subject to certain policy criteria.

Policy TCC6: Sports and Leisure

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC6/1	TCC6	The Plan is unsound as it does not have adequate reference to the need for playing pitches. The policy should be revised to make reference to the need for playing pitches to meet needs	1	Sport England	Change proposed. Reference has been inserted in Policy TCC6 for the need for development to protect existing and contribute towards new outdoor sports space, including playing pitches.
TCC6/2	TCC6	Do not agree with the proposed methodology and approach to sports centre provision	1	Sport England	No change proposed. OPDC considers the approach to be robust, based on evidence and effective for securing contributions from developers and proposes to maintain the approach set out in the policy.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC6/3	TCC6	Should reflect the wording of the NPPF para 74, which does not allow for the loss of sports facilities purely because it may be economically inviable.	1	Sport England	Change proposed. The wording on protection of sports and leisure facilities has been strengthened to align with the NPPF.
TCC6/4	TCC6	Wording should be changed so that requirement is not that the facility should be appropriately replaced, but is replaced with a facility of at least equivalent quality, quantity and accessibility as stated in the NPPF.	2	Sport England, Hammersmith and Fulham Council	Change proposed. The policy has been amended to reflect these requirements
TCC6/5	TCC6	Policy a)iii) is not an appropriate as it does not accord with the agent of change.	1	Sport England	Change proposed. This policy strand has been removed and replaced with the NPPF requirements around the provision of alternative sports provision.
TCC6/6	TCC6	Not relevant to repeat this here as the issue would be covered in transport policies and in policies dealing with amenity considerations	1	Sport England	Change proposed. OPDC agrees that these issues are covered through other policies and do not require repetition here.
TCC6/7	TCC6	Anything more than a 25 metre swimming pool is considered to be unnecessary when compared to other regeneration schemes and	1	Old Oak Park Ltd	No change proposed. The place policies and IDP identify that the starting point is to provide two sports centres, each with 1x25 pool, but equally, there could alternatively be one larger facility that provides a 50m pool and this could help to meet a deficiency in West London for a facility of

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		other infrastructure priorities for the area			this size. The only current development precedent for the scale envisaged in Old Oak is the Olympics in East London, and this does have a 50m pool, so the point around precedents from other regeneration projects is considered to be unjustified.
TCC6/8	TCC6, para 10.51	The approach akin to Fulham Pools may be a potential way to deliver sports facilities, but it is unlikely to be viable until a substantial proportion of the area has been built out	1	Old Oak Park Ltd	No change proposed. The Fulham Pools model is run on a commercial basis but with concessions access and is viable. There would be a need to consider the appropriate timing to deliver the facility to ensure that there is a critical mass of people wishing to use the facility.
TCC6/9	TCC6	Support Policy TCC6	1	Friary Park Preservation Group	Noted.
TCC6/10	TCC6	Support policy TCC6c)iii)	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted
TCC6/11	TCC6	TCC6 (a) should conform with TCC4 (a) and ensure that where there is no longer an identified use of the facility the suitability of	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. It is not clear what is meant by 'social' use; however, community uses are in a separate use class and the Local Plan cannot require a sport use (Use Class D2) to be marketed as a community

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		premises for other forms of social use (including community ownership) should always be considered.		Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	use (Use class D1), before an alternative use can be considered. Community ownership of assets is dealt with in Policy DI3.
TCC6/12	TCC6	Should include an expectation of support for the retention of existing facilities	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The policy has been revised to give stronger protection to existing facilities, but the policy does recognise that if there are other facilities in the local area that meet needs, its loss may be acceptable.
TCC6/13	TCC6	Planning gain should be used towards protecting existing and delivering new sports and leisure facilities	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The policy identifies that planning contributions will be sought towards providing new sports and leisure facilities.
TCC6/14	TCC6	Should require new sports and leisure facilities to 'provide inclusive access in terms of age, ability/disability and income'	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed inclusive and accessible design is secured for all buildings and public realm through policy SP9 and DI3. The policy expressly requires public access for all ages to indoor facilities

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	to ensure that there is non-membership access to those facilities.
TCC6/15	TCC6	Concerned about loss of existing affordable sports and leisure facilities to be replaced by less affordable commercial provision. Not for profit facilities should be given stronger protection	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The policy requires that any assessment justifying the loss of an existing sports or leisure use demonstrates that there is suitable alternative provision to meet needs resulting from the lost facility in terms of capacity, access, quality, function and affordability
TCC6/16	TCC6	This policy could draw more effectively on existing evidence bases concerning the objective need for sports facilities across the neighbouring boroughs and wider region, especially for youth and teenagers for whom provision is lacking.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's Local Plan supports the provision of new sports and leisure facilities and sets out how new development should contribute appropriately and proportionately to the provision of affordable and public access facilities.

Policy TCC7: Public Houses

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC7/1	TCC7	Object to Policy TCC7 as it is overly prescriptive and would not be able to effectively respond to changing market circumstances.	1	Citrus Group and Fuller Smith & Turner	Change proposed. The policy includes the same level of prescription as included in many other Local Plans. The London Plan supports the protection of public houses, whilst the NPPF supports the protection of community uses, so the inclusion of a policy is both in general conformity with the London Plan and consistent with the NPPF. OPDC considers that the policy approach does reflect market conditions. The policy has however been slightly amended in response to other comments from Citrus Group and Fuller Smith and Turner.
TCC7/2	TCC7	The marketing period should ideally only be for 6 months and at most 12 months, which as been adopted as an approach in other policy areas.	1	Citrus Group and Fuller Smith & Turner	No change proposed. 24 months has been adopted as an appropriate marketing period and has been adopted elsewhere in Local Plans. As an example, Lewisham requires marketing for 36 months, Greenwich and Brent require marketing for 24 months, Southwark and Hounslow for 18 months, LBHF for 12 months, RBKC has an outright resistance to loss of pubs. OPDC considers that marketing for 24 months strikes the right balance between recognising that there may not be a market interest in the continued use of the facility as a pub, with the need for an appropriate marketing period for a relatively specialist type of use. As noted in the supporting text, the competitive marketing requirements for

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					public houses are longer than for other town centre uses in recognition of the smaller number of public house operators and as a consequence, the need for a longer marketing period to identify an appropriate operator.
TCC7/3	TCC7	"Competitively marketed" is not standard industry practice, doing so would adversely affect value and viability as the business would decline, staff would leave, it would be difficult to recruit etc	1	Citrus Group and Fuller Smith & Turner	No change proposed. Requiring marketing of the premises at appropriately set rent levels of standard industry practice and is a requirement set out in numerous Local Plans in response to numerous land uses.
TCC7/4	TCC7	"Appropriate publications" lacks definition and is poorly worded.	1	Citrus Group and Fuller Smith & Turner	No change proposed. It is inappropriate to specify the publications that an advert should be placed in as companies and publications might change, but the expectation would be on the applicant to market the property in publications that are well known and used by companies likely to be interested in acquirng public house premises.
TCC7/5	TCC7	Both "all reasonable efforts" and "all diversification options" are unreasonable and far too broad to constitute a reasonable policy. If marketing and viability evidence (as	1	Citrus Group and Fuller Smith & Turner	Change proposed. It is agreed that this policy strand potentially repeats strands covered elsewhere in the policy. It has been removed.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		required by (a) and (d)) can be submitted, this part of the policy becomes redundant and should be removed.			
TCC7/6	TCC7	Should not refer to CAMRA guidance as this is one organisation with a specific focus. The test is not objective but subjective. It may be counter-productive to wider Development Plan objectives to enshrine what is essentially a wish-list into development control policy	1	Citrus Group and Fuller Smith & Turner	Change proposed. OPDC agrees that is not appropriate to necessarily refer to one interest group's publication. The key requirements in the viability test are in any case reflected in the other strands to the policy or elsewhere in the Local Plan.
TCC7/7	TCC7	The concept of “similar facilities” and “similar community environment” are too subjective and broad to form an appropriate policy test. This is a separate matter to a public house being unviable, and the policy as worded goes beyond a specific application for a specific site. There may be many other venues nearby, there may be none. The policy is too onerous as currently	1	Citrus Group and Fuller Smith & Turner	No change proposed. Public houses are a community facility and in accordance with the London Plan and NPPF (para 70), there is a need for OPDC to be satisfied that there are similar facilities in the local area that can provide for the needs of the population.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		worded, and is therefore not justified or sound			
TCC7/8	TCC7	Alternative uses could themselves generate a positive impact and one beyond that currently provided by a pub, on the character and vitality of an area through the demolition and redevelopment of the existing site of a pub rather than seeking to retain the built fabric. This strand of the policy is at odds with the other elements which seek to preserve the provision of a viable public house as opposed to the built form of the building.	1	Citrus Group and Fuller Smith & Turner	No change proposed. All three public houses have been identified as heritage assets through OPDC's Heritage Strategy. In accordance with Policy TCC7 and D8, OPDC would expect any proposal to either retain the building's fabric, or as much of it as feasibly possible. It is unclear how this strand of the policy is at odds. The policy provides policy guidance on public houses, there are some elements that relate to the pub's viability and some that relate to the character and heritage of the building as a pub.
TCC7/9	TCC7	This strand of the policy assumes that a definitive conclusion can be reached through a public consultation exercise. There is no guarantee that this would be the case and that the consultation exercise could capture the views of the majority of the local community who may have	1	Citrus Group and Fuller Smith & Turner	No change proposed. The response to the consultation would be treated on balance against the other considerations within this policy and other policy matters within the Local Plan and other development plan documents. Public consultations could take the form of door to door surveys in order to capture an appropriate cross-section of views and to avoid participation bias.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		no interest in the value of a public house.			
TCC7/10	TCC7	This strand of the policy is superfluous as there is already legislation that deals with this.	1	Citrus Group and Fuller Smith & Turner	Change proposed. It is agreed that this is superflous as it is dealt through other legislation. This policy strand has therefore been removed.
TCC7/11	TCC7	Support protection of public houses	15	Mayor of London, Hammersmith and Fulham Council, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
TCC7/12	TCC7	The policy is not effective as it does not include enough detail on public houses	1	Friary Park Preservation Group	No change proposed. OPDC considers that the policy provides sufficient deal on the areas' public houses to make the policy effective. Further detail on the areas' public houses can be found in OPDC's Heritage Strategy.
TCC7/13	TCC7	Pubs policy should support the provision of new pubs as well as protection of existing	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily	No change proposed. Provision of new A4 class floorspace is covered in Policy TCC3.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC7/14	TCC7	There should be resistance of loss of pubs through an Article 4 direction	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. There is not considered to be a need because public houses have their own separate use class and demolition of public houses has been revoked from PD through legislative changes to the GPDO in 2017.
TCC7/15	TCC7	Should include greater detail on support for the retention of facilities, including planning gain funding and collaborative working with the boroughs for the Community Right to Build.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Planning contributions need to satisfy the S106 tests, being necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. They are unlikely to be appropriately used to support the protection of public houses. Community Right to Build is dealt with in Policy DI3.

Policy TCC8: Catalyst Uses

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC8/1	TCC8	Should identify the delivery of a football stadium	1	Rory Chapman	No change proposed. The Local Plan supports the potential for catalyst uses and Policy TCC8 identifies that sports stadia fall within this definition. Any proposal would need to accord with the requirements set out in Policy TCC8 and other relevant policies in the Local Plan and other Development Plan Documents and material planning considerations.
TCC8/2	TCC8	Agree with the approach set out in this policy in part but it could mean that all major developments need to submit a catalyst uses statement unless the policy clarifies it does not apply to site allocations, but always applies to sports/stadia facilities or other 'extraordinary' uses such as conference facilities. It should not apply to more regular employment facilities or social infrastructure	1	Old Oak Park Ltd	Change proposed. Wording has been inserted in the supporting text to TCC4 and TCC8 to clarify that the catalyst uses policy will not be applied to infrastructure identified in OPDC's IDP as this infrastructure is necessary to meet the needs of development and make it acceptable in planning terms. Wording has also been inserted in the policy to clarify that where it is a cluster of uses or buildings, the policy requirement for a catalyst uses statement need only be applied where the cluster of buildings that together create a single facility - i.e. a proposal for town centre uses as part of a high street would not need to submit a town centre uses statement unless they would be creating a shopping centre.
TCC8/3	TCC8	Reference should be made to impact assessments in the supporting text to TCC8	1	Royal Borough of Kensington and Chelsea	No change proposed. Impact assessments would only be required for retail, office or

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					leisure uses - some catalyst uses may not fall within these definitions.
TCC8/4	TCC8	Support Policy TCC8	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
TCC8/5	TCC8	Would not support a sports stadium being delivered. The station interchange should suffice as a means of bringing people to the area.	14	Old Oak Interim Forum, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan does not provide support or objection to a sports stadium, but would require such a proposal to submit a Catalyst Uses Statement in accordance with Policy TCC8, and equally, would be assessed against other relevant development plan policy and other material planning considerations.
TCC8/6	TCC8, Table 10.2	Under 'complements the wider environment' should add that "It does not detract from the quality and use of open and green spaces, leisure and retail functions, as well as active frontages"	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine	No change proposed. The policy requirements relating to open space are dealt with elsewhere in the Local Plan, in SP8 and EU1. Impact on leisure and retail is dealt with in Policy TCC1. Impact assessments would only be required for uses falling within retail, leisure or office

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	uses, in accordance with the NPPF. Active frontages are dealt with within the quantitative criteria under the objective to be 'part of a holistic offer'.

Policy TCC9: Meanwhile Uses

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC9/1	TCC9	Requiring mechanisms to allow meanwhile uses to occupy permanent developments will dissuade developers from proposing meanwhile uses.	1	Old Oak Park Ltd	Change proposed. The requirement is for the strategy to set out proposed approaches to supporting this. It is not a necessity that an occupier of a meanwhile use should be incorporated into new development proposals as it will not be suitable or viable in all cases. However, where appropriate, OPDC would expect landowners to try and support the potential for meanwhile uses to occupy permanent development, through mechanisms such as staggered rentals, business support and through right of first refusal. Wording in the supporting text has been revised to clarify that the provision of permanent space for meanwhile uses is not a requirement, but instead, is something that would need to be considered and mechanisms worked through with developers.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC9/2	TCC9	Should require meanwhile uses not to compromise longer-term plans. The policy as currently worded is too loose and could compromise longer term delivery.	1	Ealing Council	No change proposed. The need for meanwhile uses to not compromise the deliverability of key sites is outlined within strand a)iii).
TCC9/3	TCC9	Meanwhile uses should not form part of the consideration of a planning application at the initial stage as they are not relevant to the acceptability of the longer term development proposals.	1	Old Oak Park Ltd	No change proposed. OPDC wants to incentivise the optimised use of land, particularly where development will be phased over many years. OPDC therefore considers it important to understand the potential feasibility for meanwhile uses at application stage, so that a meanwhile strategy can be secured through planning agreement or condition.
TCC9/4	TCC9	Meanwhile uses should be a priority as many development sites will not be brought forward until post 2026	1	David Craine	Noted. OPDC is supportive of meanwhile uses subject to them according with Policy TCC9 and other relevant development plan policies and material considerations.
TCC9/5	TCC9, para 10.66	Support recognition of artists and potential meanwhile uses	1	ArtWest	Noted.
TCC9/6	TCC9	Support Policy TCC9	14	Hammersmith Society, Pentecostal City Mission, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC9/7	TCC9	The policy should be applied positively and impact on delivery of site allocations not used as an excuse by developers	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
TCC9/8	TCC9	Proposals for meanwhile uses should also mitigate impacts on neighbouring town centres	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. If a meanwhile use was large enough and of the appropriate use class to warrant an impact assessment, this would be governed through the requirements outlined in Policy TCC1 and potentially through Policy TCC8. Other relevant policies in the Local Plan would also be applied to a meanwhile use.

TCC10: Visitor Accomodation

Comment reference	Section of Local Plan	Issue Summary	Number of consultees	Name of consultees who raised the issue	OPDC Response

	comment relates to		who raised issue		
TCC10/1	TCC10	Support policy TCC10	2	T.A.S.B. Investments Limited, A40 Data Centre B.V	Noted.
TCC10/2	TCC10	Reference to London's need for 40,000 bedrooms should be removed as it does not relate specifically to the OPDC area and is soon to be out of date	1	Mayor of London	Change proposed. Reference to the number of bedrooms has been removed from the policy. The figures have been updated with the new London Plan figures in the supporting text.
TCC10/3	TCC10	Broadly support the policy but it may impact on the supply of land available for other requirements in the Plan	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The policy did identify the need to not compromise the supply of housing, but this has been amended to require that proposals would not compromise the delivery of housing targets and would support the delivery of jobs targets, particularly within site allocations.

P**olicy TCC11: Night Time Economy**

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
TCC11/1	TCC11	Support policy TCC11	14	Mayor of London, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully,	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
TCC11/2	TCC11	Policy TCC11's supporting text should reference the Mayor's 24-hour London vision which sets out his plan to turn London into a leading 24-hour global city and focuses on building a night-time culture	1	Mayor of London	Change proposed. Reference to this has been inserted in the supporting text.
TCC11/3	TCC11	The policy is not effective and should include more information about the night-time economy.	1	Friary Park Preservation Group	No change proposed. OPDC considers that the policy provides sufficient deal on the night-time economy to make the policy effective.
TCC11/4	TCC11	Planning applications for new night time economy uses need to be assessed in terms of their impact on existing night time economy uses in Harlesden. Applications that have a detrimental impact should be refused.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Retail and Leisure Needs Study identifies that Harlesden Centre will undergo growth over the next 20 years, both as a result of background growth, and also as a result of expenditure from the OPDC area. Within OPDC's Retail and Leisure Needs Study, estimates for floorspace provision within the OPDC area have been made on the basis of 80% retention of convenience expenditure and 20% retention of comparison expenditure, meaning there will be significant opportunities for Harlesden to capture this growth. Policy TCC1, which would include night-time economy uses,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					requires Impact Assessments where schemes meet the thresholds outlined within the policy and which fall within retail, leisure and office uses.

11: Delivery and Implementation

Introduction

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI/1	Introduction	Do not support reference to potentially exceeding OPDC's homes and jobs targets	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Annual homes targets are minimum targets. OPDC is also keen to support the delivery of significant employment opportunities. The wording recognises this would only be supported 'where feasible' and the planning policies would always be applied to assess the acceptability of any proposals.

Policy DI1: Balancing Priorities and Securing Infrastructure Delivery

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI1/1	DI1	Balance also needs to reflect site specific constraints and constraints affecting development feasibility and viability and other 'non infrastructure' planning obligations	2	Castlepride Ltd, Segro	Change proposed. This has been included in the policy, but text has also been inserted into the supporting text to clarify that site specific constraints such as land contamination should impact land values and that the costs for addressing these issues should not neccessarily be borne through reduced planning obligations or sustainability standards, in accordance with the Affordable Housing and Viability SPG.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI1/2	DI1	Should recognise the potential for some developments to deliver benefits-in-kind and where appropriate that such benefits may offset the liabilities and planning obligations listed in the policy	1	Castlepride Ltd	No change proposed. 'In-kind' contributions are still a form of planning obligation and do not need to be drawn out explicitly within the policy or supporting text.
DI1/3	DI1	Support Policy DI1a)	4	Mayor of London, TfL, Segro, David Craine	Noted.
DI1/4	DI1	The Cargiant site is being expected to provide a significant amount of social infrastructure to serve the needs of the wider area, including a primary school, sports centre, community centre and health centre. For this to be acceptable, there needs to be a greater acknowledgement of the viablilty of delivery on this site	1	Old Oak Park Ltd	No change proposed. It is not considered necessary to identify this site in particular within this policy; however, the Local Plan recognises in Policy DI1 and in policy H2 (affordable housing) that there is a need to balance affordable housing with other matters affecting viability, such as infrastructure delivery. In Policy H2's supporting text, Old Oak North is identified as a particular location where there will be significant infrastructure requirements
DI1/5	DI1	D1a) is a critical issue and this point should be referenced throughout the Local Plan	1	Old Oak Park Ltd	No change proposed. It is not felt necessary to repeat points continuously throughout the Local Plan. Policy DI1 is a cross-cutting policy and by consequence, applies to all sites within the OPDC area.
DI1/6	DI1	Do not need the word 'appropriately'. Suggest its deletion	1	Hammersmith and Fulham Council	Change proposed. OPDC agrees and has removed the word from the policy.
DI1/6	DI1	Acknowledge that there are associated costs with	1	Hammersmith and Fulham Council	No change proposed. OPDC considers that the wording of the policy already

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		development, however, these are essential in delivering the overarching Spatial Vision and bring benefits to the applicant. This balance should be acknowledged in the text.			acknowledges this balance, which also includes the need for deliverability and timely regeneration of the area. This accords with the NPPF and presumption in favour of sustainable development.
DI1/7	DI1	Measures to ensure balancing priorities and securing infrastructure delivery seem vague.	1	Friary Park Preservation Group	No change proposed. The policy recognises the need to balance priorities to support the timely regeneration of the area. The exact balance would need to be judged on a case by case basis.
DI1/8	DI1	The Plan is not sound because it has not set out a clear position on infrastructure costs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Plan covers a 20 year period and given these timescales, in many instances, infrastructure costs are unknown. The IDP identifies infrastructure requirements and where known, costs have been included. Policy DI1 sets out how OPDC will work proactively with stakeholders to secure the infrastructure necessary to support the sustainable regeneration of the area. This is not limited to planning obligations and CIL and recognises there are a vareity of funding sources that may need to be explored to make support the delivery of infrastructure.
DI1/9	DI1	Concerned that there is not a clear approach to addressing the infrastructure funding gap and that this will result in greater reliance on developer	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. The policy sets out the expectation that there would need to be a balance between different priorities. As outlined in the policy and supporting text, OPDC are investigating many avenues for the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		contributions and will compromise development quality		Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	funding of infrastructure and is not placing an over-reliance on developer contributions.
DI1/10	DI1	There is not a contingency plan if there are delays to infrastructure delivery or if infrastructure proves too expensive to deliver	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The purpose of a Local Plan is to set out a long-term strategy for the regeneration of the area. The Local Plan is supported by Key Performance Indicators which will monitor the delivery of policies. If this monitoring shows OPDC's policies are not being achieved, OPDC will look to undertake a review of the Local Plan. however, text has been added to the supporting text to Policy SP10 identifying that decisions not to proceed with the delivery key pieces of critical infrastructure, required to enable the attainment of homes and jobs targets, would trigger a need for a review of OPDC's Local Plan policies
DI1/11	DI1	The policy refers to an appropriate balance, but does not say what is appropriate or how it could be achieved	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	Change proposed. The wording in the lead in to the policy clarifies that it is to support the successful regeneration of the area and wording has been added to the supporting text that to clarify that any balance would need to deliver on the principles of sustainable development outlined in the NPPF.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI1/12	DI1	Support DI1b)	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
DI1/13	DI1	Policy is not justified. It opens on OPDC to pressure from speculative developers to push applications through the system, with 'timely' schemes prioritised in a way that is given excessive weight in decision-making	15	Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. As set out in the policy, there is a need to balance these issues and OPDC would not seek to prioritise one strand if it were to result in unsustainable development. Wording has been inserted in the supporting text to clarify that any balance of these issues would still need to ensure that development is sustainable and upholds the principles of sustainable development set out in the NPPF.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI1/14	DI1	Result of policy will distort any properly balanced programme of phased development in which social and community infrastructure is built provided in time to serve the needs of incoming residents	15	Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. In accordance with Policy SP10 and Policy DI2, OPDC would always require/secure infrastructure to ensure that it is provided in time to serve the needs of the new population.
DI1/15	DI1	Additional wording should be added where private sector operators are involved in infrastructure on which the public will rely (e.g. energy services, communal heating systems) planning approvals will ensure that future management arrangements have adequate public oversight	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Electricity is regulated. Heat is unregulated, but policy EU10 requires proposals to provide evidence of appropriate management mechanisms to ensure that end customers are protected in respect of the price of energy provided and the level of service. Whilst the heating industry is not regulated in the same was as other utilities, OPDC, as developer/coordinator, is working to ensure any district heating network delivered joins the UK's Heat Trust scheme. The UK's Heat Trust puts a common standard in the level of quality and protection as you would expect from other utilities and provides customers free access to the Energy Ombudsman.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI1/16	DI1	Support Policy DI1	1	Education and Skills Funding Agency	Noted.
DI1/17	DI1	The plan is not effective because it does not provide evidence or give clarity that balancing priorities and securing infrastructure delivery will actually secure affordable housing, decent places, sustainable community facilities as well as the infrastructure necessary to deliver the plan	15	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The appropriate balance needs to be judged on a case by case basis. The Affordable Housing Viability Assessment shows that on some sites with higher values and medium infrastructure requirements, targets will be attainable, but on others that may have lower values, higher infrastructure costs and higher on-site constraints, they will not. This balance or recognition of viability is enshrined in the NPPF and the need for viabiltiy to be a factor in affordable housing delivery is reognised in the NPPF, London Plan and in policies SP4 and H2 of OPDC's Local Plan. Policy DI1 sets out that OPDC will pursue many other avenues for the funding of infrastructure than purely S106/CIL and that the expectation is not that development should be funding all the infrastructure required to deliver the spatial vision.
DI1/18	DI1	The plan does not include a clear financial strategy for addressing the funding gap	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. It is not the role of the Local Plan to develop a clear cashflow funding model for all infrastructure delivery. As identified in the policy, there will be a need for a variety of funding sources to deliver infrastructure. The funding gap alluded to within the Development Infrastructure Funding

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Study did not consider all funding sources or cashflow or growth/inflation.
DI1/19	DI1	Do not support the use of tax increment financing unpredictable and imprudent in the face of multiple uncertainties regarding the UK and London economies, as well as additional debt burdens already accruing to the Mayor and this money is needed by local councils for services.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan does not state that this funding and financing option will be pursued, but it is one option at OPDC's disposal. TIFs have been utiliised with success in the Vauxhall Nine Elms Battersea project to fund the Northern Line Extension, so there is a precedent for their use on major development projects in London. OPDC will produce a separate delivery strategy, sitting outside of planning, which would assess available options and make recommendations to OPDC Board on the preferred sources of alternative funding and financing.
DI1/20	DI1	The Whole Plan Viability Study shows that affordable housing commitments can only be met on some sites and then only on the basis of 30% LAR and 70% intermediate, which does not meet OAN	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. When setting an affordable housing target, it is not neccessary to demonstrate that the target can be delivered on all sites. OPDC considers that the assumptions behind the AHVA and Whole Plan Viability Study are appropriate given the strategic nature of the assessment of affordable housing viability undertaken to support the Local Plan and that this assessment accords with the requirements of the National Planning Policy Framework ('NPPF') and the Local Housing Delivery Group guidance 'Viability Testing Emerging

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Local Plans: Advice for planning practitioners' (June 2012) and is comparable to other viabilty assessments undertaken by other Local Planning Authorities in the development of Local Plans.The 30% - 70% split between LAR and intermediate housing does meet OAN. Further detail is set out in OPDC's Housing Evidence Statement supporting study.
DI1/21	DI1	The deliverability of the plan is undermined by the lack of control of land.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. A significant proportion of the land is in public sector ownership and OPDC is acting as a coordinator of this public sector land. OPDC may acquire some or all of this public sector land through the MOU with central government. OPDC also has CPO powers, as set out in policy DI4.
DI1/22	DI1	The current uses in the area impact of sales values, meaning there is less money for affordable housing and s106 contributions and that proposals are for higher densities than is acceptable	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. It is not clear what is meant by this. Existing Use Values (EUVs) range across the site. Some sites have relatively low EUVs whilst others have relatively high EUVs. OPDC considers that EUVs are broadly comparable with many other regeneration sites in London. The EUVs of different sites have been factored into OPDC's viability work supporting the Local

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Plan - specificially the Affordable Housing Viability Assessment and the Whole Plan Viability Study.
DI1/23	DI1	Recent schemes have not achieved affordable housing levels set out in the Local Plan, and have not provided adequate contributions to infrastructure	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Affordable housing is subject to viability, in accordance with Policies SP4 and H2 and infrastructure contributions were secured in accordance with the S106 tests.
DI1/24	DI1	There needs to be clear recognition that where major development schemes are required to provide significant new infrastructure this will reduce the amount of affordable housing that can be viably provided.	1	Old Oak Park Limited	No change proposed. The suporting text in Policy SP4, H2 and DI1 recognise this.

Policy DI2: Timely Delivery and Optimised Phasing

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI2/1	DI2, para 11.23b, Table 11.1	Reference to the delivery of the Elizabeth Line depot within the plan period should be removed.	1	TfL	Change proposed. The table has been revised to identify that the Elizabeth Line depot is not identified as coming forward in the plan period but that development around it should provide for non-preclusion and that OPDC will support its potential earlier delivery if proven to be feasible.
DI2/2	DI2, Table 11.1	List of landowners should differentiate between freehold and leasehold.	1	TfL	No change proposed. The table provides a high level summary and is not considered necessary to draw out freehold and leasehold arrangements.
DI2/3	DI2, Para 11.23	Need to recognise that long-term redevelopment of operational rail facilities would need to take account of future operational needs.	1	TfL	Change proposed. Wording has been inserted in the supporting text to acknowledge this.
DI2/4	DI2	Need to recognise that any de-designation of rail sites would be subject to standard industry procedures and consultation.	1	TfL	No change proposed. This process sits outside of planning policy.
DI2/5	DI2	Measures to ensure timely delivery and optimised phasing seem vague.	1	Friary Park Preservation Group	No change proposed. OPDC considers the policy limbs to be effective and specific.
DI2/6	DI2	This is an important policy for setting out the draft timetable for various parts of the site	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Noted.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI2/7	DI2	Effective organisation and monitoring of this programme will be essential	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Delivery will be monitored through OPDC's Annual Report, which includes OPDC's Authority Monitoring Report.
DI2/8	DI2	The policy should refer to minimising disruption during construction	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This is dealt with in policies SP10 and in T8.
DI2/9	DI2	The policy gives excessive priority to early implementation which will compromise	15	Old Oak Interim Forum, Grand Union Alliance, Midland Terrace Residents	No change proposed. Schemes being implemented early would still need to accord with planning policy requirements

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		affordable housing and open space provision.		Association, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	for open space provision and affordable housing.
DI2/10	DI2, Table 11.1	The table should include the size of each site, the anticipated density and the anticipated range of building heights	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Further details on density have been added to SP9 supporting text and the associated figure shows the locations where tall buildings are acceptable in principle. Building height ranges, where appropriate, have been added to the place policies. Building height ranges are only specified where there is a need for more specific policy guidance in sensitive locations and where OPDC has undertaken more detailed design work to support such a policy. It is not considered appropriate to set height ranges on a place-wide basis as in many parts of the area, the exact nature of development that might come forward is not yet known and to set a cap on building heights would be inflexible.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI2/11	DI2	Object to the policy as it will encourage ill- considered and speculative development	14	Old Oak Interim Forum, TITRA, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC does not consider that that the policy will promote ill considered and speculative development. This is just one policy in the Local Plan. Compliance with this policy does not mean a scheme will be approved. Schemes must be assessed against all relevant development plan policies and other relvant material planning considerations.
DI2/12	DI2	Support Policy DI2	1	Education and Skills Funding Agency	Noted.
DI2/13	DI2	Approving schemes early results in negative consequences. OPDC have approved schemes recently that will have unacceptable levels of noise and air pollution	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This comment relates to specific planning applications. Applications have been determined in accordance with para 14 of the NPPF. OPDC also supports the early delivery of sites, but only where they accord with relevant development plan policies and other material planning considerations. Schemes would still be required to accord with other relevant planning policies, including policies dealing with noise and air quality. It is not felt necessary to repeat the need for proposals to accord with all other relevant planning policies and material considerations within this policy.

Policy DI3: Stakeholder Engagement and Being a Proactive Planning Authority

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI3/1	DI3	Disappointed that the Old Oak Neighbourhood Area applied for by the Interim Forum was not designated by OPDC. This reflects poorly on OPDC's community engagement.	13	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Oonagh Heron,	Noted. This does not have a direct bearing on the Local Plan. Details on OPDC's consideration of the appropriateness of the neighbourhood area can be found on OPDC's website at: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/planning-old-o-10
DI3/2	DI3	Support policy DI3 and commitment to regularly review and updates its Statement of Community Involvement	1	Association for Consultancy and Engineering (ACE)	Noted.
DI3/3	DI3	D13 (d) envisages supporting community management, without any implementation proposals detailed. This could be explored further in this policy. This should include support through, planning gain funding and collaborative working with the boroughs for the Community Right to Bid, Community Asset Transfer and establishment of development trusts.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC considers the wording in the policy to provide sufficient detail, but further examples of community delivery and management models have been provided in the supporting text and support for community build initiatives has been inserted into the policy.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI3/4	DI3, Figure 11.3	The Shield site is not in public ownership as HS2 have agreed to transfer land back to private landowners	1	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. The sites being acquired by HS2 for construction purposes will be shaded a separate colour.
DI3/5	DI3, para 11.31	Para 11.31 and 11.32 should reference RBKC and the other Western Riverside Waste Planning Authorities and the extent of cooperation with these bodies.	1	Royal Borough of Kensington and Chelsea	No change proposed. Reference to working with a wider network of local authorities is already included in this paragraph and further details relating to discussions between OPDC and the WRWA planning authorities are included in OPDC's Duty to Cooperate Statement.
DI3/6	DI3	Support Policy DI3	15	Hammersmith and Fulham Council, Friary Park Preservation Group, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
DI3/7	DI3	Support Policy DI3e)	1	Hammersmith and Fulham Council	Noted.
DI3/8	DI3	OPDC are not being a proactive planning authority because they did not approve	3	Nicky Guymer, Bruce Stevenson, Mark Walker	No change proposed. The designation of the Neighbourhood Area does not relate directly to the Local Plan. The reasons for revising

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		the Old Oak Neighbourhood Area as submitted and instead significantly reduced the boundary.			the boundary are set out further on OPDC's website: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/planning-old-o-10
DI3/9	DI3	Support aspiration of policy but the tendency to date has been to ignore the views of the local authorities, community groups and residents	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC disagrees and significant changes have been made between the Reg 18 Local Plan and the 1st Reg 19 Local Plan and the 1st Reg 19 Local Plan and 2nd Reg 19 Local Plan, to address concerns from community groups.
DI3/10	DI3, para 11.31	OPDC has a duty to cooperate with local authorities, but this has not been upheld in respect of planning applications	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Duty to Cooperate does not relate to planning applications. In any case, neighbouring local authorities have been consulted on planning applications where appropriate.
DI3/11	DI3	Disappointed with OPDC's negative attitude to the formation of neighbourhood	13	Hammersmith Society, Wells House Road Residents Association,	No change proposed. As stated in Policy DI3 and paragraph 11.36 of the supporting text OPDC is committed to working with both

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		plans, to which the Local Plan merely pays lip service.		Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	emerging and established Neighbourhood Forums. It is unclear what additional information OPDC is expected to include on Neighbourhood Plans other than that OPDC will provide assistance to communities developing them.
DI3/12	DI3	Policy is not effective because the SCI is weak on pre-application engagement. Planning forums should be set up and meetings should be set up between applicants and community groups	15	Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The commitment in the Local Plan is to undertake regular reviews of the SCI, which is a separate document to the Local Plan. The SCI was first published in 2016. OPDC undertook a review of the SCI in 2017, to address comments from local community groups, particularly in relation to pre-application engagement and a revised version was published during 2017. OPDC has therefore upheld this policy to date and will continue to do so.
DI3/13	DI3	The policy is not effective because OPDC did not designate a neighbourhood area application as submitted.	17	Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, Jason Salkely, Dave Turner, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis,	No change proposed. The designation of the Neighbourhood Area does not relate directly to the Local Plan. The reasons for revising the boundary are set out further on OPDC's website: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/planning-old-o-10

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI3/14	DI3	Providing support to forums is a statutory requirement of a LPA so does not warrant having a policy.	13	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. It is considered important to have a statement in the Local Plan setting out that OPDC will provide this support. Other community groups have asked for even further detail on how OPDC will support neighbourhood planning so OPDC considers the current content within the policy strikes the appropriate balance referencing that support will be in place.
DI3/15	DI3	The policy is not effective because OPDC's engagement has been lacking including not sending regular newsletters to community groups	15	Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Community newsletters do not relate to statutory planning processes. In the production of the Local Plan, OPDC's stakeholder engagement has far exceeded statutory requirements. Details on consultation activities undertaken by OPDC are set out in OPDC's Statement of Consultation.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI3/16	DI3	OPDC has not fulfilled its Policy DI3b or Statement of Community Involvement with required actions, in various ways.	1	TITRA, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The commitment in the Local Plan is to undertake regular reviews of the SCI, which is a separate document to the Local Plan. The SCI was first published in 2016. OPDC undertook a review of the SCI in 2017, to address comments from local community groups, particularly in relation to pre-application engagement and a revised version was published during 2017. OPDC has therefore upheld this policy to date and will continue to do so.
DI3/17	DI3, para 11.33b)	The Education and Skills Funding Agency should be referenced as an infrastructure provider in 11.33b)	1	Education and Skills Funding Agency	Change proposed. Work with the Education and Skills Funding Agency has been referenced in the supporting text.
DI3/18	DI3	Policy is not sound because OPDC has not actively encouraging participation from local community groups in planning applications and have not addressed their concerns	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The requirements for engagement on planning applications is not directly dealt with through the Local Plan. Engagement on planning applications is governed through the Development Management and Procedure Order (2015). OPDC's Statement of Community Involvement also sets out further procedural guidance in relation to planning applications, particularly support for early pre-application engagement with community groups. OPDC considers that OPDC has encouraged early engagement with local community groups. OPDC does not consider this to therefore impact on the soundness of Policy DI3.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI3/19	DI3	Welcome changes that were undertaken to the SCI, but these requirements have not been carried into the Local Plan	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy DI3 is a high level policy dealing with engagement with all stakeholders - not just community groups. Detailed arrangements for engagement with residents and community groups are set out in OPDC's SCI, but Policy DI3 does set out that OPDC will keep this document under regular review.
DI3/20	DI3	Requirements outlined in the SCI have not been met, such as developer forums and proper early engagement from developers	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. These comments relate to the SCI rather than the Local Plan. In relation to early engagement, OPDC cannot require developers to undertake pre-application engagement, only strongly encourage it through the SCI. In respect of developer forums, these have been established.
DI3/21	DI3	Text from the SCI on early engagement with communities should be transposed into the Local Plan	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. These are detailed matters that are appropriately dealt with in the SCI. It is not considered appropriate to repeat this in the Local Plan. The Local Plan does reference the importance of engagement with communities, both pre and post submission of planning applications within Para 11.35.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI3/22	DI3	Policy should state that pre-application discussions between OPDC and developers and viability assessments will be published	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The need for published viability assessments is covered in OPDC's Validation Checklist. Publication of pre-application comments on the submission of planning applications is a detailed matter, most appropriately dealt with through the SCI and this requirement will be included within the next update to the SCI.
DI3/23	DI3	S106 contribution discussions should be published in advance of the conclusion of pre-application discussions	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's SCI notes at para 3.9 that until an application is submitted, pre-application advice and discussions, including discussions on S106 contributions are confidential. OPDC requires Planning Obligation Heads of Terms to be submitted to meet OPDC's validation requirements in its Validation Checklist.
DI3/24	DI3	Policy is not sound as it does not set out how forums or community ownership arrangements will be supported and funded. It	14	Grand Union Alliance, Penecostal City Mission, Wells House Road Residents Association, Joanna Betts, Nadia	Change proposed. Wording has been inserted into the supporting text to clarify that OPDC will secure appropriate funding opportunities with developers, service providers and community groups for

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		should state that CIL or S106 contributions will be considered as funding sources.		Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	community ownership initiatives. The text does not limit this solely to s106 and/or CIL as there will be other funding opportunities. Funding arrangements for forums are dealt with by Locality on behalf of CLG. Wording on support for forums in developing their plans is already provided in the policy.
DI3/25	DI3	Should identify that CIL funding will be used to fund the implementation of neighbourhood plans	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Neighbourhood Plan production is funded through Locality on behalf of CLG. The allocation of CIL funding is set out through OPDC's Regulation 123 List, which is produced separately to the Local Plan.
DI3/26	DI3	Statements regarding support for Neighbourhood Forums also should include the need to be mindful of the potential for financial flows from the overall development through the share of CIL entitlements to be directed to enabling the neighbourhood plan implementation. Opposed to top-down determination of neighbourhood forums'	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Once a Neighbourhood Plan has been made, legislation requires that the community are consulted on 25% of CIL captured within the Neighbourhood Area. The second point appears to relate to the designation of Neighbourhood Areas. There is separate legislation and National Planning Practice Guidance relating to the consideration and designation of Neighbourhood Areas that do not merit repetition in the Local Plan.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		delimitations, and request that a form of words to require a commitment to respectful working with local forums, and openness to ensuring that the required income streams for enacting the local plan are provided through sensible and negotiated border delimitations.			
DI3/27	DI3, para 1.33a)	Keen to work with OPDC on transport related issues in the area	1	West London Line Group	Noted.
DI3/28	DI3	Should set out that Assets of Community Value are a material consideration when determining planning applications	1	Pentecostal City Mission	No change proposed. ACVs are dealt with through legislation, which specifies that a building being a ACV is a material planning consideration when considering applications. OPDC does not consider that there is a need to re-state this legislation in a policy in the Local Plan.
DI3/29	DI3	Need to set out transparent information about ACV listings	1	Pentecostal City Mission	No change proposed. Responsibility for designating Assets of Community Value rests with the local authority rather than the local planning authority. OPDC therefore cannot provide a list of details of properties that are listed as ACVs.
DI3/30	DI3	Should make it explicit that there will be a mechanism for warranted interventions to retain assets that are already	1	Pentecostal City Mission	No change proposed. Community ownership of a premises is not a material planning consideration unless listed as an ACV. However, OPDC's Local Plan sets out a

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		in community ownership but are under pressure from developers			series of planning policies that seek to protect existing uses subject to certain criteria being met. This includes policies protecting social infrastructure (Policy TCC4) and public houses (Policy TCC7).
DI3/31	DI3	Should support community asset ownership	1	Pentecostal City Mission	No change proposed. Support for community ownership initiatives is dealt with in Policy DI3.
DI3/32	DI3	The assessment of the Local Plans viability would be aided by the analysis of business plans like the one agreed for Old Oak North, schedule for September 2017 for which there is a budgeted £0.8m set aside.	1	Pentecostal City Mission	No change proposed. The Business Plan work is associated with OPDC's role as a developer. OPDC is also a planning authority and there must be separation between OPDC's function as a local planning authority and as a developer.
DI3/33	DI3	Planning obligations should be used to build the capacity of community groups to enable them to contribute to the delivery of the OPDC's social infrastructure targets	1	Pentecostal City Mission	No change proposed. Planning obligations need to satisfy the s106 tests (as set out in the CIL Regulations) which are to be: (a)necessary to make the development acceptable in planning terms; (b)directly related to the development; and (c)fairly and reasonably related in scale and kind to the development. OPDC does not consider that securing contributions to directly build capacity within community groups to deliver social infrastructure would necessarily ensure that these tests are being accorded with, but the Local Plan does identify the need for development to contribute to social

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					infrastructure to meet needs - the exact form of the delivery of this infrastructure may need to be considered on a case by case basis, but OPDC's starting point would be the requirements set out within the Infrastructure Delivery Plan (IDP).

Policy DI4: Planning Powers and Monit

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DI4/1	DI4	The monitoring and enforcement of planning powers are vague	1	Friary Park Preservation Group	No change proposed. OPDC considers that the policy and supporting text adequately convey the powers at OPDC's disposal.
DI4/2	DI4	Support the principle of pre-application advice but there should be earlier public consultation with communities	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. OPDC's Statement of Community Involvement sets out how OPDC will encourage developers to undertake early and meaningful pre-application engagement with local community groups.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hollender, Jeremy Aspinall, Thomas Dyton	
DI4/3	DI4	Support the need for engagement with a Place Review Group, but this should be re-constituted to include representatives from the local community	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC is now establishing a Community Review Group. Reference to this has now been included in the Local Plan.
DI4/4	DI4	Support preparation of other policy guidance including SPDs	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
DI4/5	DI4	The KPIs are inadequate as they do not monitor things identified for monitoring in the IIA.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Change proposed. KPIs will be updated with relevant IIA monitoring indicators. Where IIA indicators are not currently proposed to be included within the Local Plan Key Performance Indicators a rationale will be proposed.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
DI4/6	DI4, para 11.43	para 11.43 should not just refer to major planning applications but to all planning applications	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The text referring specifically to major applications to undertake pre-application engagement has been removed.

Appendix

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
A1/1	A1.45	The plan should recognise that Brent is and will continue to be an area of great diversity	1	Harlesden Lets	No change proposed. Recognition of the diversity of the area is set out in Figure A1.9.

	Figure A1.8	Figure A1.8 is missing the Pentecostal Church and nursery (2 Scrubs Lane) and NADI community centre and gym on Old Oak Common Lane.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The figure has been updated and reviewed to ensure it includes all known existing community facilities.

Supporting studies

Affordable Housing Viability Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
AHVA/1	AHVA	Costs from the DIFS should be used to inform an appropriate area-wide appraisal assumption with the Deloitte notional site testing. Whilst it is accepted that any determination of the required infrastructure costs will not be final, the level of detail is considered sufficient to inform the AHVA, which is itself an area-wide study comprised of high level appraisal assumptions	1	Old Oak Park Ltd	No change proposed. OPDC is not proposing for all infrastructure costs to be borne through Section 106 or Community Infrastructure Levy. Recognition of this is clearly set out within Policy DI1 and within the DIFS. OPDC considers that the assumptions behind the AHVA and Whole Plan Viability Study are appropriate given the strategic nature of the assessment of affordable housing viability undertaken to support the Local Plan and that this assessment accords with the requirements of the National Planning Policy Framework ('NPPF') and the Local Housing Delivery Group

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					guidance 'Viability Testing Emerging Local Plans: Advice for planning practitioners' (June 2012) and is comparable to other viability assessments undertaken by other Local Planning Authorities in the development of Local Plans.
AHVA/2	AHVA	The assumed sales values in the AHVA assume that the infrastructure has been provided but the AHVA does not take full account of the cost of providing the infrastructure.	1	Old Oak Park Limited	No change proposed. In accordance with National Planning Policy Guidance, sales values have been based on findings of comparable evidence of transacted new-build and re-sale properties in the area and are also based on a comparison of the sales values adopted on emerging developments in the area. They represent a range of values and are similar to those adopted in the Whole Plan Viability Study, also part of the evidence base for the Local Plan. Also in accordance with National Planning Policy Guidance, for an area-wide viability assessment, a broad assessment of costs is required. It includes the level of Community infrastructure Levy identified in the Preliminary Draft Charging Schedule. It cannot consider all the infrastructure costs as these will be identified through planning. The sales

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					values are considered to be appropriate on this basis.
AHVA/3	AHVA	The five notional site typologies tested by the AHVA are not reflective of the specific characteristics of the Local Plan area. The OOP site is not reflected yet represents approximately a quarter of all homes anticipated of being delivered within the Local Plan area.	1	Old Oak Park Limited	No change proposed. In accordance with National Planning Policy Guidance (NPPG), assessing the viability of Local Plans does not require individual testing of every site or assurance that individual sites are viable. In accordance with NPPG, and the Harmon Report on Viability Testing in Local Plans, notional site typologies can be used to determine deliverability at a policy level where they are representative of the whole area. The five notional sites test different EUVs based on existing land uses in the area, a range of densities that broadly accord with densities set out in the Development Capacity Study and sales values that were deemed appropriate by independent experts (Deloitte) on behalf of OPDC. This would accord with the requirements in the NPPG. It is also clear in the AHVA and in the Local Plan itself that individual sites may require more detailed site and scheme specific viability analysis when they come forward through the development management process.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
AHVA/4	AHVA	The viability of the notional sites is overstated because the full cost of providing the infrastructure has not been included.	1	Old Oak Park Limited	No change proposed. In accordance with National Planning Policy Guidance, for an area-wide viability assessment for policy purposes, a broad assessment of costs is required. The AHVA includes the level of Community Infrastructure Levy identified in the Preliminary Draft Charging Schedule. It cannot consider all the infrastructure costs as these will be identified through the development management process and depend on external funding available to support infrastructure delivery. Policy DI1 in the Local Plan identifies a key priority to secure additional public and private funding sources to support infrastructure delivery, in addition to developer contributions.
AHVA/5	AHVA	An additional site typology should be included in the AHVA representing OOP.	1	Old Oak Park Limited	No change proposed. As set out in National Planning Policy Guidance, assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable; site typologies may be used to determine viability at policy level. As stated in the AHVA and in the Local Plan, individual sites will require more detailed site and scheme specific viability analysis when

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					they come forward through the development management process.
AHVA/6	AHVA	The AHVA is based on a residual land value approach. No consideration has been given to alternative lead developer models.	1	Old Oak Park Limited	No change proposed. The National Planning Policy Framework states that viability should consider "competitive returns to a willing landowner and willing developer to enable the development to be deliverable." The residual land value approach is the method commonly used by developers when determining how much to bid for land and involves calculating the value of the completed scheme and deducting development costs (e.g.:. construction, fees, finance, Section 106 contributions, Community Infrastructure Levy and developers profit), and is appropriate for the majority of sites in the OPDC area. Furthermore, the residual land value approach is recommended by the Harmon Report on Viability Testing in Local Plans. It is clear in the AHVA and in the Local Plan itself that individual sites may require more detailed site and scheme specific viability analysis when they come forward through the development management process. Alternative approaches such as lead developer models will be considered on a case by case basis.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
AHVA/7	AHVA	The AHVA adopts a GIA to NIA ratio of approximately 80%. This is considered too high for a strategic site and the result is to overstate the viability of the notional sites being tested.	1	Old Oak Park Limited	No change proposed. A gross to net ratio of 80% (allowing 20% core circulation) is a standard measure used in viability testing for Local Plan and Community Infrastructure Levy purposes. However, some sites will require more detailed site and scheme specific viability analysis when they come forward through the development management process to reflect multiple cores.
AHVA/8	AHVA	The proposed employment policies have a value impact and this affects the overall viability of development proposals, including the level of affordable housing that may be achieved.	1	Old Oak Park Limited	No change proposed. The Whole Plan Viability Study, included in the evidence base, has assessed all the Local Plan policies to identify those policies likely to impact on development viability, such as affordable housing, infrastructure (including Community Infrastructure Levy), environmental standards, open space requirements and employment policies (including affordable workspace and commercial floorspace at Old Oak Common Station). The conclusion of the Whole Plan Viability Study is that in the round, the polices contained in the Local Plan would be viable.
AHVA/9	AHVA	A 5% contingency allowance in the AHVA is not enough for a multi-phased scheme such as OOP.	1	Old Oak Park Limited	No change proposed. The high-level assumptions are based on comparable brownfield sites. However, applicants would be able to demonstrate higher

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					contingency requirements through robust evidence submitted as part of viability assessments.
AHVA/10	AHVA	Costs of remediation and decontamination at OOP are likely to be higher than those assumed in the AHVA	1	Old Oak Park Limited	No change proposed. The high-level assumptions are based on comparable brownfield sites. However, applicants would be able to demonstrate higher contamination requirements through robust evidence submitted as part of viability assessments.
AHVA/11	AHVA	The AHVA should be rerun talking the cost of infrastructure into account. In the first instance, this should be determined through the DIFS which already forms part of the Local Plan evidence base, but which can be supplemented through further dialogue between OOP Ltd and the OPDC as a result of the site-specific viability testing currently being undertaken.	1	Old Oak Park Limited	No change proposed. OPDC consider the viability work completed to date by OPDC is to the level of detail appropriate to inform policy work and in accordance with the requirements in National Planning Policy Guidance. It includes the level of Community Infrastructure Levy identified in the Preliminary Draft Charging Schedule and an assumed s106 contribution. Policy DI1 indicates that there will be other sources of infrastructure funding sought, not just developer contributions. As stated in the AHVA and in the Local Plan, individual sites will require more detailed site and scheme specific viability analysis when they come forward through the development management process and

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					taking into account actual infrastructure and other requirements.

Development Capacity Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DCS/1	DCS	Support for inclusion of Cargiant site in Brownfield Register part 1	1	Old Oak Park Limited	Noted
DCS/2	DCS	Does not support local environment and surroundings.	1	Arnaud Demas	The Development Capacity Study has been developed to respond to sensitive locations as set out in Policy SP9.
DCS/3	DCS	Too many tall buildings proposed.	1	Ron Thorp	No change proposed. The Development Capacity Study does not set out building heights guidance. The approach to tall buildings is set out in Policy SP9, the Place policies and Policy D5.

Duty to Cooperate Statement

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
DTCS/1	Duty to Cooperate Statement	Need to set out how you have engaged with the local councils	1	Scott Cawley	No change proposed. OPDC's Local Plan is supported by a Duty to Cooperate Statement, which sets out how OPDC has engaged with local councils and other public bodies.
DTCS/2	Duty to Cooperate Statement	Additional meetings should be included in the Duty to Co-operate report		Royal Borough of Kensington and Chelsea	No change proposed based on the activities set out in the response, as they contain in accuracies. The Duty to Co-operate is a live document which is being updated at each stage. Where relevant the engagement activities have been updated/amended as appropriate.

Education and Health Needs Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EHNS/1	Education and Health Needs Study	The Education and Health Needs Study is unsound as it has not been positively prepared and fails to meet the infrastructure needs of the development	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. The Education and Health Needs Study outputs have been updated and incorporated into a new Social Infrastructure Neeeds Study.
EHNS/2	Education and Health Needs Study	Current schools operate with only a small surplus so will require expansion to accommodate growth envisaged. Further feasibility work	17	Brent Council, Ealing Council, Hammersmith and Fulham Council, Grand Union Alliance, Wells House Road Residents	Change proposed. The Education and Health Needs Study has been updated and incorporated into a new Social Infrastructure Needs Study. Assumptions about surplus capacity have been revised in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		should be undertaken to ascertain a school's potential for expansion		Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Harlesden Neighbourhood Forum	discussion with the boroughs. Potential expansion projects have been removed.
EHNS/3	Education and Health Needs Study	Should undertake further engagement with CCGs to ensure estimates of need and strategies for meeting this are as accurate as possible	1	Ealing Council	Noted. Further discussions have been undertaken with the NHS and CCGs to ensure consistency between OPDC's new Social Infrastructure Needs Study and their strategies.
EHNS/4	Education and Health Needs Study	The Education and Health Needs Study uses a GLA methodology for calculating child yield, which generates too high a child yield.	1	Old Oak Park Ltd	Change proposed. The modelling has been updated based on the GLA child yield calculator v2 high density scenario.
EHNS/5	Education and Health Needs Study	The modelling assumptions for child yield should be amended as follows: - Reconsidering the sample sites used – outer London boroughs such as Brent are not a reasonable representation of what the future urban form will be for this area. - Adjusting the age splits for younger children to take account of	1	Old Oak Park Ltd	Change proposed. The modelling has been updated based on the GLA child yield calculator v2 high density scenario, to better reflect the character of future development at Old Oak. Assumptions have also been made within OPDC's modelling for specialist housing types and a related reduction in child yields for these typologies.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		the fact that flatted developments have a higher proportion of pre-school children relative to school agedchildren - Allowing for normal levels of vacancies (the model assumes 100% occupation at all times) - Allowing for specialist housing (student, elderly, build to let) and their particular occupation characteristics, which are likely to reduce the child yield			
EHNS/6	Education and Health Needs Study	Developer contributions may not be sufficient to fund required off-site expansions of education facilities.	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Noted. Policy DI1 identifies that OPDC will seek to secure alternative funding sources as required to secure the delivery of infrastructure, but OPDC will negotiate s106 contributions in accordance with the S106 tests and is also progressing a CIL charging schedule for the area.
EHNS/7	Education and Health Needs Study	The Education and Health Needs Study and Infrastructure Delivery Plan are not clear as to when off-site expansions of education facilities are required.	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. The new Social Infrastructure Needs Study has been produced through engagement with relevant service providers. Any use of off-site capacity has been agreed in advance of the finalisation of the study. Off-site expansion requirements are appropriately reflected in the IDP.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EHNS/8	Education and Health Needs Study	The Education and Health Needs Study needs to better understand and model mental health needs	1	Health and Wellbeing Board - London Borough of Ealing	Change proposed. The new Social Infrastructure Needs Study has incorporated modelling of the space required for primary and community mental health services.
EHNS/9	Education and Health Needs Study	Recognise that school planning is complicated and mechanisms should be in place to ensure continued dialogue between OPDC and the Council as the masterplan progresses	1	Hammersmith and Fulham Council	Noted. OPDC is committed to continued dialogue with the local education authorities to plan, monitor and manage the need for new school places during the Plan period.
EHNS/10	Education and Health Needs Study	Policy does not make reference to choice in school ie. faith schools or provision for children with special needs. This should be addressed	1	Diocese of London	Change proposed. Figure 10.5 has been updated to identify the need for special educational needs as part of education provision. Faith (and single sex) schools sometimes have restrictions around access for no-faith members and therefore could limit their ability to meet the needs of the development.
EHNS/11	Education and Health Needs Study	It is better to have an even number of forms of entry for curriculum planning purposes. 8FE is therefore better than 9FE	1	Diocese of London	Noted. However if the need is for an odd number of form entries, that it what must be provided for.
EHNS/12	Education and Health Needs Study	There needs to be mixed affordabilities for nursery provision. Need nursery spaces in schools. Why are only private nurseries mentioned?	1	Diocese of London	Change proposed. The new Social Infrastructure Needs Study assumes that some early years/nursery space will be provided within primary schools as well as in privately run nurseries.
EHNS/13	Education and Health	Should make mention of Church of England as a school provider.	1	Diocese of London	No change proposed. Faith (and single sex) schools sometimes have restrictions around

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
	Needs Study				access for no-faith members and therefore could limit their ability to meet the needs of the development. OPDC would therefore need to assess the merits of this sort of provision on a case by case basis. OPDC's starting point would always be to support facilities that best meet the needs of the populations they serve.
EHNS/14	Education and Health Needs Study	Would be better to deliver primary schools as 2FE schools rather than 4FE to give them more of a community feel.	1	Diocese of London	No change proposed. Delivery of social infrastructure facilities at scale delivers the greatest efficiencies and best value for money. The Social Infrastructure Needs Study recommends that a 4FE primary school is a suitable model to adopt based on other precedents in London.
EHNS/15	Education and Health Needs Study	It should be recognised that school provision will need to be reappraised if housing figures change	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This is already recognised in the supporting text to Policy TCC4.
EHNS/16	Education and Health	The policy is silent on early years provision and nursery provision, which also need to be considered	13	Hammersmith Society, Wells House Road Residents Association,	No change proposed. Early years provision and early years provision requirements have been modelled in the Social Infrastructure

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	Needs Study			Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Needs Study and are set out in OPDC's IDP and are identified as a type of social infrastructure in Figure 10.5.
EHNS/17	Education and Health Needs Study	On-site health provision should be provided in two health centres rather than one large hub.	13	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC must accord with the requirements for facilities provided by the CCGs. National policy set out in the NHS General Practice Forward View supports the provision of primary care at scale, including larger practices and/or more joined up networks of GPs that can offer a wider range of services to patients, including extended opening hours. The CCGs in NWL support the delivery of one larger health facility. However, the supporting text does recognise that if situations change, alternative arrangements for on-site social infrastructure can be made if approved by OPDC and the relevant service provider.
EHNS/18	Education and Health Needs Study	Have not considered social care needs as part of healthcare provision.	14	HUDU, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	Change proposed. The new Social Infrastructure Needs Study has incorporated modelling of the space required to provide social care services.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
EHNS/19	Education and Health Needs Study	Concern that off-site healthcare provision in early phases is in facilties that are already under strain.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The CCGs have identified that the new primary care facility at Central Middlesex Hospital which opened in Spring 2018 has additional capacity and that the size of Hammersmith Centre for Health and Willesden Centre for Health and Care can be expanded in order to increase the capacity of primary care at those sites.
EHNS/20	Education and Health Needs Study	The early years needs are met through 5 super nurseries. Sites should be identified for their delivery.	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The Social Infrastructure Needs Study and the IDP outlines the sub areas for 3 of the 4 super-nurseries.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EHNS/21	Education and Health Needs Study	Population growth needs to be broken down by age band	1	NHS Brent CCG	Change proposed. This has been provided in the new Social Infrastructure Needs Study.
EHNS/22	Education and Health Needs Study	The report needs to clarify that the proposed NHS approach is for one central health hub with one or two spokes	1	NHS Brent CCG	Change proposed. The new Social Infrastructure Needs Study makes it clear that this is the CCGs' preferred approach.
EHNS/23	Education and Health Needs Study	It is not clear if the size of facility proposed will also provide adequate space for social care, not just primary care.	1	NHS Brent CCG	Change proposed. The new Social Infrastructure Needs Study has used the Health Building Note 11 to derive floorspace requirements. This makes assumptions for space required to provide social care.
EHNS/24	Education and Health Needs Study	If the option for Mitre Wharf to provide the health facility was pursued, this would impact on healthcare provision in North Kensington	1	NHS Brent CCG	No change proposed. The Mitre Wharf site was assessed and was not identified as the most appropriate location for the health hub and was therefore discounted.
EHNS/25	Education and Health Needs Study	The study does not capture all the primary care practices close to OPDC's border.	1	NHS Brent CCG	Change proposed. The new Social Infrastructure Needs Study has mapped all known primary care practices close to OPDC's border
EHNS/26	Education and Health Needs Study	Due to changes in the way primary care is being delivered now and will continue to develop over the duration of the Local Plan, due consideration needs to be given to the wider primary care workforce, including nurses, health care	1	NHS Brent CCG	Noted. The new Social Infrastructure Needs Study has used the Health Building Note 11 to derive facility requiements. The Local Plan's policies support the provision of affordable housing that would allow the primary care workforce to access housing in the local area. Policy SP5 supports the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		assistants and associated health professionals.			provision of new jobs across a range of employment sectors and skills levels.
EHNS/27	Education and Health Needs Study	Consideration has been given to the capital costs of delivering infrastructure but not to the revenue costs	1	NHS Brent CCG	No change proposed. NHS England is responsible for allocating NHS revenue funding from Government to provide health care for the growing population using a weighted population formula. However, the Local Plan does identify that where necessary and viable, OPDC will look to secure contributions from development proposals towards management and maintenance costs.
EHNS/28	Education and Health Needs Study	It is unclear what the methodology has been to arrive at a need for acute beds	1	NHS Brent CCG	No change proposed. The NHS has undertaken a strategic review of acute bed needs in West London and has confirmed that there is no need for additional acute bed provision arising from development within the OPDC area.
EHNS/29	Education and Health Needs Study	Need to consider wider health and well-being impacts such as access to green space, access to employment and encouraging walking and cycling	1	NHS Brent CCG	No change proposed. These issues are dealt with through a number of policies across the Local Plan.
EHNS/30	Education and Health Needs Study	The Study does not adequately reflect the final, published STP and the reference to patient list sizes and primary care space per GP in sub-section 5.3 does not support	1	NHS Brent CCG	Change proposed. The new Social Infrastructure Needs Study has used the Health Building Note 11 to derive floorspace requirementsand no longer refers to number of patients or primary care space per GP.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		the aspirations of the Five Year forward view.			
EHNS/31	Education and Health Needs Study	Basing facility size on list size per GP and GP numbers is an outdated model and references should be removed throughout Section 5.	1	NHS Brent CCG	Change proposed. The new Social Infrastructure Needs Study has used the Health Building Note 11 to derive floorspace requirementsand no longer refers to number of patients or primary care space per GP.
EHNS/32	Education and Health Needs Study	Reference should be made to St Charles Centre for Health and Wellbeing and delivery of a primary care centre at Central Middlesex Hospital in 2018.	1	NHS Brent CCG	Noted. The new primary care centre at Central Middlesex Hospital and St Charles Centre for Health are referenced in the new Social Infrastructure Needs Study.
EHNS/33	Education and Health Needs Study	Table 17 needs to be updated with current position and list sizes. A statement is needed in respect of patient choice and the opportunity for patients to continue to choose which GP practice they register with.	1	NHS Brent CCG	Change proposed. The table has been updated in the new Social Infrastructure Needs Study with the current position and list sizes. A statement regarding patient choice has been included in the new Social Infrastructure Needs Study.
EHNS/34	Education and Health Needs Study	The study needs to be revised in terms of its assumptions on the use of historic estimates for future projections and the lack of individual borough housing growth built into the assumptions, the use of surplus capacity within schools and further work is required to	1	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. Following discussions with the boroughs, the new Social Infrastructure Needs Study does not rely on off-site expansion of existing schools. The advice from the Boroughs is that off-site existing primary schools can meet the needs from the development in phases 1 and 2 without needing to expand. The Early Years

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		investigate the feasibility of increasing the capacity of identified schools and to investigate need for eary years, pre-school and SEN provision			and Education chapters specifically address SEN needs.
EHNS/35	Education and Health Needs Study	Table 10 of the Study (Para 4.5) should be clarified so that it is clear which schools are earmarked for expansion and which are being identified for use of surplus places	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. This has been clarified in the new Social Infrastructure Needs Study, which does not rely on off-site expansion of existing schools.
EHNS/36	Education and Health Needs Study	Issues/concerns regarding identified schools in LBHF, Brent and Ealing area. Further planning work will be necessary on each of these sites in order to establish their capacity for development and additional engagement with OPDC before these plans are finalised.	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. Following discussions with the boroughs, the new Social Infrastructure Needs Study does not rely on off-site expansion of existing schools.
EHNS/37	Education and Health Needs Study	Other changes proposed to the study to address issues raised and to clarify the current position of the boroughs	3	Brent Council, Ealing Council, Hammersmith and Fulham Council	Change proposed. Other issues have been addressed through the production of the new Social Infrastructure Needs Study.
EHNS/38	Education and Health Needs Study	Not clear from the study whether there will be sufficient outdoor space for play in the commerical nurseries	1	Diocese of London	Change proposed. Wording has been inserted in the new Social Infrastructure Needs Study to identify that the size requirements identified for the facilities incorporated adequate provision for play space

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
EHNS/39	Education and Health Needs Study	Support the production of the Education and Health Needs Study and consider it to be positively prepared and justified.	1	Education and Skills Funding Agency	Noted.

Future Employment Growth Sectors Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
FEGGS/1	Future Employment Growth Sectors Study	Query the forecast decline in motor trades as unduly pessimistic, and wonder if Park Royal could be promoted as a hub for Connected Autonomous Vehicles.	**1**	Park Royal Business Group	No change proposed. The Future Employment Growth Sectors Study considered a range of data sources, including the GLA and Cambridge Econometric employment forecasts, to try and understand how sectors might change. However, the Local Plan will cover a 20 year period so it includes flexibility and does not restrict the possibility for motor trades to grow in

Grand Union Canal Massing Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
GUCMS/1	Grand Union Canal Massing Study	Concern that study will be exploited by developers as a minimum standard for development, ignoring context.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers the Grand Union Canal Massing and Enclosure Statement provides sufficient clarity regarding the role of the statement and guidance.
GUCMS/2	Grand Union Canal Massing Study	Study methodology is using incorrect ratios from Urban Design Compendium. Ratios for "square/very wide street" should be used instead of "streets".	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers the Grand Union Canal Massing and Enclosure Statement uses the correct ratios.
GUCMS/3	Grand Union Canal Massing Study	Concern that diagrams in the study will encourage developers to build right up to boundary of the canal, not deliver space for a liner park, and create a canyon effect.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers the Grand Union Canal Massing and Enclosure Statement provides sufficient clarity regarding the role of the statement and guidance.
GUCMS/4	Grand Union Canal Massing Study	Precedent of canal adjacent to Kensal Green Cemetery is a good precedent for benefits of widening the canal corridor.	1	The Inland Waterways Association-Middlesex Branch	Noted.
GUCMS/5	Grand Union Canal Massing Study	Minimum towpath width of 8.5 metres is needed, allowing for separation of cycle path from pedestrian footway and appropriate green verge.	1	The Inland Waterways Association-Middlesex Branch	No change proposed. The proposed width of southern towpath is set out in recommendations of OPDC's Public Realm, Walking and Cycling Strategy. This reflects its transport role and local context.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
GUCMS/6	Grand Union Canal Massing Study	The statement fails to consider the unique character and qualities of the canal corridor and its often asymmetric sections, as well as its range of typical level differences, all of which should inform the level of enclosure in the first instance. Overall, the statement is not considered to be helpful or appropriate.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the Grand Union Canal Massing and Enclosure Statement provides appropriate information to informal general heights along the Grand Union Canal.

Gypsy and Traveller Accommodation Assessment

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
GTAA/1	GTANA	OPDC's GTANA is in broad agreement to Ealing's own findings in the 2013 GTANA refresh.	1	Ealing Council	Noted.
GTAA/2	GTANA	LBHF and RBKC are jointly responsible for a Traveller site at Stable Way and that the two Councils have completed a Joint GTANA (Dec 2016). The study applies the PPTS definition of Travellers and concludes that the total accommodation needs across the two boroughs, LBHF and RBKC, is 9 pitches to 2030. This needs to	1	Royal Borough of Kensington and Chelsea	An addendum has been produced to assess the capacity in OPDC's area to help meet these needs

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		be acknowledged and considered as part of the OPDC GTANA.			

Heritage Strategy

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
HS/1		Heritage strategy should be updated to take account of the refurbishment of Former Railway Institute building	1	Raban Goodhall Ltd	No change proposed. OPDC considers the information presented in OPDC's Heritage Strategy to adequately reflect the current quality of the Former Railway Institute.
HS/2		Wells House Road should be listed as a community asset and designated as a conservation area	13	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Sharon Hayward, Jeremy Aspinall, Thomas Dyton, Wells House Road Residents Association, Hammersmith Society	No change proposed. OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. Conservation area designations result in their areas becoming 'designated heritage assets'. Designations ares a statutory process governed by legislation and Historic England Guidance. Conservation areas must demonstrate local historic and/or architectural significance. Local refers to the OPDC area. The Heritage Strategy did not identify Wells House Road as a potential conservation area based on an assessment of the heritage significance of the area. However, the Strategy does propose the street to be a Local Character Area. This is an OPDC specific designation that helps to identify the

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					area as a 'non-designated heritage asset'. The Heritage Strategy notes that 'Its character does not prevent (or place any special requirements on) domestic extensions or alterations, nor does it prevent development in its setting.' Assets of Community Value are nominated by community groups and designated by the local Borough. Once designated, ACVs can be considered as material considerations in planning decisions.
HS/3		Consideration should be given to the assessment of the settings of other designated heritage assets outside the OPDC area.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC does not consider it appropriate for OPDC's Heritage Strategy to access the settings of assets outside of the OPDC area. This information is provided by the boroughs' heritage guidance documents. Policy D8 has been amended to conserve and enhance heritage assets and their settings. This would include assets and their settings outside of the OPDC area.
HS/4		The creation of a Local List is welcomed and should be mapped. There are errors in the existing local list and statutory list. Consideration should be given to locally listing other assets such as Cross of Sacrifice War Memorial at Acton Cemetery	1	London Borough of Hammersmith and Fulham	Noted. Consultation and adoption of OPDC's Local Heritage Listings was carried out in 2018. This addressed errors on the list and included the Cross of Sacrifice War Memorial at Acton Cemetery.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
HS/5		Some of the Character Areas need further assessment related to townscape and relationship to the canal and/or open space and future identity.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the assessment of Character Areas within the Heritage Strategy to be appropriate to the role of a supporting study to OPDC's Local Plan. Further assessment of proposed heritage assets will be carried out in their designation, including conservation areas.
HS/6		The status and the nature of other buildings of local heritage interest and Areas of local character are unclear. The rationale for this additional layer of heritage designation has not been fully explained. The selection criteria for this designation needs further explanation.	1	London Borough of Hammersmith and Fulham	No change proposed. Consultation and adoption of OPDC's Local Heritage Listings was carried out in 2018. This included the selection criteria for the Local Heritage Listings and the rationale for two components of the listings.

Integrated Impact Assessment

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
IIA/1	IIA	The Local Plan and IIA should have tested alternative options for the capacity of homes and jobs the area could deliver, particularly a lower capacity. Hammersmith and Fulham assessed lower capacity	16	St Quintin and Woodlands Neighbourhood Forum, Hammersmith Society, Old Oak Interim Forum, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts,	No change proposed. Government guidance advises that only reasonable alternatives to proposals should be considered. NPPG Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		alternatives in their Local Plan prior to OPDC's establishment, so OPDC should also have tested lower capacity alternatives.		Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable." The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal are specifically referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015. The FALP, together with the OAPF set a strategic development capacity target for the OPDC area and it would therefore not have been

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					appropriate to test lower development capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan. OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable. It should be noted that LBHF's Issues and Options consultation was undertaken in advance of the consultation on and publication of the Mayor's Old Oak and Park Royal Opportunity Area Planning Framework and in advance of the publication of the London Plan (2015).
IIA/2	IIA	Inadequate consultation was undertaken on the IIA scoping process	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Scoping consultation for the IIA was carried out in accordance with Regulation 13(5) of The Environmental Assessment of Plans and Programmes Regulations 2004. This requires that when deciding on the scope and level of detail of the information that must be included in the IIA report, the responsible authority shall consult the consultation bodies. A scoping workshop was held in July 2015 with attendees from the consultation bodies and other organisations including: the Greater London

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Authority (GLA); Transport for London (TfL); OPDC; Historic England; the London Boroughs of Brent, Ealing, Hammersmith and Fulham and Kensington and Chelsea; Public Health England; and the Environment Agency. The outputs of this workshop informed the IIA Scoping Report. The Scoping Report was subject to a 5 week public consultation period between 4 September and 5 October 2015. All stakeholders on OPDC's consultation database, including consultation bodies, community groups and individuals, were notified.
IIA/3	IIA	The "Community-Based Vision and Objectives" submitted by the Grand Union Alliance, should inform an assessment of alternatives to the current OPDC Reg 19 local plan	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. National Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. The proposed community-based vision and objectives were submitted as part of the OPDC Local Plan regulation 18 consultation. The content of the proposed

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					vision and objectives were embedded within the spatial vision, narratives and policies of the OPDC Local Plan regulation 19 consultation. As such, OPDC did not consider the vision and objectives were reasonable alternatives as they weren't sufficiently distinct from the content of the Local Plan to highlight the different sustainability implications so that meaningful comparisons can be made. In light of this the IIA did not specifically assess the proposed community-based vision and objectives as reasonable alternatives.
IIA/4	IIA	Appendix G is missing from the IIA published for public consultation	13	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Part 4.5 of the IIA refers to Appendix G in relation to mitigations measures. This was an error. Reference should have been made to Appendix F. This minor amendment has been made.
IIA/5	IIA	The IIA does not accord with legislation or NPPF and NPPG guidance. Alternative strategic options or reasonable alternative options	15	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline	No change proposed. The IIA has been developed and consulted on in accordance with the relevant legislation, national guidance and good practice guidance to identify, describe and evaluate the likely significant effects on the environment of

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		have not been tested in regulation 18 and 19 versions of the Local Plan. IIA of the overall Local Plan has not been carried out. Proposed community-based vision should be used for IIA alternative option assessment for the whole Local Plan.		Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Just Space, Old Oak Interim Neighbourhood Forum	implementing the Local Plan, including reasonable alternatives. No change proposed. The IIA and Local Plan have been developed in full accordance with the requirements of legislation, national guidance and good practice recommendations to assess reasonable alternatives and strategic options within the IIA of the Regulation 18 Local Plan. The IIA of the Regulation 19 did not assess reasonable alternatives in accordance with NPPG paragraph 013 Reference ID: 11-013-20140306. NPPG Paragraph: 001 Reference ID: 11-001-20140306 confirms that “Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation.“ Government guidance advises that only reasonable alternatives to proposals should be considered. NPPG Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable." The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal are specifically referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015. The FALP, together with the OAPF set a strategic development capacity target for the OPDC area and it would therefore not have been appropriate to test lower development

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan. OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable. No change proposed. OPDC's IIA carries out a proportionate approach in its assessment in accordance with NPPF paragraph 167. Specifically, the spatial vision and narratives have been subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise has been used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives. A more detailed assessment of the policies has been undertaken using an assessment matrix. These assessments are then considered in the round to provide a summary of the assessment which is set out on page iv of the IIA. However, an assessment of strategic options was carried out in the IIA for the Regulation 18 consultation following recommendations of good practice

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					guidance. OPDC considered that the approach to affordable housing warranted assessment as a strategic option. This reflects the potential impact of the different approaches to affordable housing may have on wider placemaking and infrastructure requirements. The regulation 18 Local Plan also proposed alternative policy options. These were considered to be reasonable alternatives and were assessed by the IIA for the regulation 18 Local Plan. No change proposed. The proposed community-based vision and objectives were submitted as part of the OPDC Local Plan regulation 18 consultation. The content of the proposed vision and objectives were embedded within the spatial vision, narratives and policies of the OPDC Local Plan regulation 19 consultation. As such, OPDC did not consider the vision and objectives were reasonable alternatives as they weren't sufficiently distinct from the content of the Local Plan to highlight the different sustainability implications so that meaningful comparisons can be made. In light of this the IIA did not specifically assess the proposed community-based

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					vision and objectives as reasonable alternatives.

Victoria Road and Old Oak Lane Development Principles

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
VROOLDP/1		The study should recognise that the Midland Gate site is suitable for a tall building due to its location and contribution to delivering key infrastructure.	1	Castlepride Limited	No change proposed. Principle 4.7 of the Victoria Road and Old Oak Lane Development Framework Principles document identifies that tall buildings may be appropriate around Old Oak Common Lane Station subject to other relevant planning policies. OPDC considers this is an appropriate approach to the role and function of the Principles Document.

Sports Courts and Swimming Pools Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SCSPS/1		Do not consider the work undertaken as part of the Sports Courts and Swimming Pools Study to be sound as the work was focussed on Hammersmith and Fulham.	1	Sport England	No change proposed. The study was commissioned for Hammersmith and Fulham Council but identifies current provision and demand across the entire 3 host boroughs and therefore can be relied on as evidence for OPDC's purposes.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
SCSPS/2		Do not support the standards approach set out in the policy	1	Sport England	No change proposed. OPDC has attempted to comply with the Sport England guidance, undertaking an assessment of need and understanding broadly how this need will neccessitate new sports facility provision. OPDC's Local Plan identifies the need for two on-site sports and leisure facilities. However, the exact size of these facilities will be contingent on the population generated by development and there needs to be a way of calculating how each individual scheme should fairly and reasonably contribute to any sports and leisure facility. OPDC therefore considers a standards approach to be the robust way of securing contributions from developers that would best satisfy the S106 tests and would enable appropriate implementation of an equitable equalisation mechanism (and any required retrospective pooling contribution) for the funding of on-site (in-kind) infrastructure.

Precedents Study

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
PS/1	Precedent Study	The Local Plan should include Bosco Verticale in Milan as an example of how tall residential	13	Hammersmith Society, Wells House Road	Change proposed. OPDC agrees that Bosco Verticale should be included within

Appendix G

Organisations invited to make representations on the first Regulation 19 (1) Draft Local Plan in summer 2017.

Organisation
100% Digital LTD
24-7 Drama
3D Reid
5th Studio
A B M Motors Ltd.
A New Direction
A.W. Interiors
AA Cash + Carry
Abbey Bay
Abbey Manor
Ableprop Limited
ABM
Abu Afif Sweets
Acava
ACAVA studios
Accident Claim Company
Ace
Ace Cafe London
Ace Post Production
ACPO Secured by Design
Acton Central (Ealing)
Acton Coachworks
Acton Community Forum
Actwe Ventures
Acute Properties
AD Londres
AD Wake Ltd
Addictive
Addleshaw Goddard
Adjunct Associate
Adventum Offshore Private Limited
AECOM
Aedas
Afks Construction
AGA Motors
Aggregate Industries UK Limited
Ala Kayfak

Organisation
ALAN CAMP
Alba Stone
Albion Waste
Alchemi Group
ALDAU
Aldau Development
ALDStone
Alexanders
Alfimar
Alison Brooks Architects
Al-Jabal Bakery
Al-Jabal Foods
Allies and Morrison Urban Practitioners
Almacantar
Almalthea Designs
Alpha Transfer Ltd
Al-SQR Express
Alter London
AM Construction LTD
Amari Plastics
Amaya
Amber Sphere
AMBICAN
Ameresco
Ammoura
Amro Real Estate Partners
AMZ Motors
Anderson Wilde & Harris
Apply Food and Drinks
Appy Food and Drinks
Aqua architecture ltd
Aqua Lite
Aquality Trading & Consulting Ltd.
AR Architecture
AR Motors
AR Urbanism
Archies

Organisation
Architecture for London
ARCO Safety Suppliers
Ardmore
Argent
Ariana Autocrash
Arid Norman
ARK Bentworth Primary Academy (London Borough of Hammersmith & Fulham)
Arney Fender Katsalidis
Art House Hire Ltd
Artedi
ARUP
Ary Network LTD
AS Cars
Asbestech LTD
Asda
Asesorama
Ash Sakula Architects
Ashby Croft
Assembly Studios
Asserson
Aston
Astudio
Atex Business Solutions
Atkins Limited
Aurora Property Group
Aussie Man & Van
Auto Audio
Auto Stilo
Auto Trust
Automotive
Avant Garde
Awafi Foods
Aylesworth Fleming
Azerbaijan Development Company
B&Q
B&Q / Trade Point
B.V.C.
B4U
Babcock
Bakavor
Baker Rose
Balfour Beatty

Organisation
Ballymore
Bank of America Merrill Lynch
Bar Bar
Baraka CafÃƒÂ©
Barbara Weiss Architects
Barbers
Barker Ross recruitment
Barrybank
Barton Willmore
Battersea Power Station Development Company (BPSDC)
Battle McCarthy
BBC
Beat about the Bush
Bechtel
Beckley Group
Bedford
Beehive Projects
Bel Motors
Bella Pierre Cosmetics
Bellway
Benchmarx
Benoy
Berkeley
Berwin Leighton Paisner
Bespoke Events London
Best Clearance LTD
Bimber Distillery
Bircham Dyson Bell
Blue Sky Development
Bluespec
BMO Real Estate Partners
BMW
BNP Paribas Real Estate
Boden
Body Shop
Bodywork Business
Bond Bryan
Boodle Hatfield
Book People
Bostock and Pollitt
Bounce Back
Bracknell Forest
Brakes

Organisation
Bravo Wembley
Brazilian Association
Brazilian Salon
Brent Citizens
Brent Council - Green spaces
Brent Cyclist
Brent Cyclists
Brent Friends of the Earth
Brent Housing Action
Brent Mencapâ€™s Disabilities, Rights and Politics Group
Brent resident
Brent, Harrow and Hillingdon CCGs
Brent, Harrow, Hillingdon and Ealing CCGs
Brian Clarkes Studio
Bridget Baker Consulting
Brighton and Hove City Council
Brightsparks
Brisac Gonzalez
Bristows LLP
Britfil Steel Fab
British Council
British Embassy Beijing
British Land Developments
Broadgate Estates
Broadway Malyan
Brookfield
Brown & Mason Limited
Brunel University
BSS
BT Innovate & Design
BTRT Ltd
Buckinghamshire County Council
Builder Depot
Burges Salmon
Burleigh College
Burlington Danes Academy (London Borough of Hammersmith & Fulham)
Buro Four
Buro Happold
Burohappold Engineering
Bury Council
Business Mobiles

Organisation
Business Prestige
Butler and Young
By This River
Cadogan Tate
CafÃ© Royal
CafÃƒÂ© Ola
Cambridgeshire County Council
Camebpt
Campaign for Better Transport
Campbell Architects
CAN Forum
Canal & River Trust
Canal River Trust
Canapes Direct
Cannon Hygiene
Cannon Hygiene Ltd
Capco
Capita
Capital Accountants Ltd
Capital PIP
Car Body Repairs
Cargiant
Carlo Manzi
Carlos Garage LTD
Carter Jonas
Castle Pride
Catalyst Housing Group
Catapult Future Cities
Catch 22
CBRE
CBRE Hotels
CCH
CENF
Central Bedfordshire
Central London, West London, Hammersmith & Fulham, Hounslow and Ealing CCGs (CWHHE CCGs)
CgMs
CH2M
Chair FOWS
Chair H&F Historic Buildings Group
Chair of OOFRA
Chair: Harlesden Town Team
Chandlers Roofing

Organisation
Chapman Taylor
Charmant
Chart Lane
Cheyne Capital
Child Graddon Lewis
Chiltern Railways
Choice
Chris Blandford Associates
CIMB Bank Berhad
Cirque du Soleil
Citi Logik
City & Docklands
City and Docklands
City Insights
City of London Corporation
City of Westminster
Cityscape Digital
Civil Aviation Authority
CLAD
Clarion Housing Group
Classic Fine Foods
CLAUK
Clearance World
Clearview Homes
Cleshar
Clicks and Links Ltd
Cliomat
CNR International Trade Fairs Inc.
Co Work Hub
College Park and Old Oak (H&F)
College Park Residents Assocaition
Collins Motors
Colonial World Foods
Colour Sound Experiment
Commonplace
Compagnie du Parc Limited
Concept
Concept Engineering Consultants Limited
Conductor Marketing
Construction Catering Services
Construction Catering Services (CCS)
Construction News
Construction Products Association

Organisation
Construcution Youth
Cothill Educational Trust
Country Garden
Countryside
Covent Garden Candles
Coverdale Barclay
CPA / WPA
CPC Project Services
CPPS
Cracknell
Create Space London
Create Streets
Creative Genies
Crisis
Crofton
Crosstree
Crown Paints
Curtins
Custard Factory
CWHHE CCGs
Cyrenians
D Cutler International LTD
DAC Beachcroft
DAF Royal Parks
DAMAC Properties
Dandi Space
Danny Sullivan Group
Darnton
Data Centre
David Lock Associates
Dawnfern Ltd
Day Lewis Planning Ltd
Deadline
Dean Street Developments
Delight Capital
Deloitte
Delta
Deluxe Printers
Department for Communities and Local Government
Department for Communities and Local Government BIS
Department for Transport
Dephina

Organisation
Dephna
Dephna Estates
Design Council
Design Engine Architects Ltd
Design Haus Liberty
Design South East
Designer Flowers Ltd
Designers Guild
Deverell Smith
Deverellsmith
DeVono
Dexter Moren Associates
Diageo
Diamond Vehicles
Diocese of London
Dominos
Domino's Pizza
Domus
Dooa
Door Entry Direct
Dorset County Council
Dowa
DP9
DPD
DPRA
Dragon King
DS2
DSI Foods
Ducane Housing Association
Duggan Morris Architects Ltd
Dukelease
Durkan Limited
Dutch and Dutch
DWD2
Dyer and Butler
E.P.A. Languages Services Ltd.
Eagle Tyres
Ealing CCG
Ealing Central and Acton
Ealing Civic Society
East Acton (Ealing)
East Sussex
East Sussex County Council

Organisation
Eastdil Secured
Ebbsfleet Development Corporation
EC Harris
ECG
Ecocycle
Ecotricity
Edelman
Elec Mec
Elegant Dry Cleaners
Elite-ia
Ellen MacCarthur Foundation
Elliott Wood
EMR
Enabling Projects (Town Planners)
Energy and Utilities Alliance
Enfield Council
Enfield Council - Planning Policy Team
English Heritage
Enotria & Coe
EnPlus
Enterprise Singapore
Entiq
Envac
Environment Agency
EON Energy
Epsom & Ewell Council
Equinix
Eskonas
Essential Living
Essex County Council
Estates Gazette
ETC Connect LTD
Eton International
Euro Bridge
Euro Car Parks
Euroclad
Europcar Car Rental
European Glass
European Metal Recycling Ltd
Eutech Cybernetic
Eva Real Estate Appraisal Consultancy
Evolve Agency
F&H Auto LTD

Organisation
F1 Motors
Facebook
Fairview Homes
Faithful Gould
Family Mosaic
Far Reach Group Limited
Farley
Farley Prop Hire
Farrells
Feel Good Caribbean Restaurant
Feel Good Carribean Resteraunt
Feilden+Mawson
Ferax Estates
Film & TV Services LTD
Film + Medical
Financial Times
Fit Out UK
Fletchers
Fletcher's Bakery t/a Grain d'Or
Flexeye
Floral Image
Fluid
FM Conway
Focus International Christian Centre
Fone House
Food Distribution
Forbes
Forefront
Foreman Roberts
Formation Architects
Forty Shillings
Foster + Partners
Foundry
Four Fifty Six
Four Zero One
FOWWS
Francis Knight
Frank Wingate Communtications
Freshmart
Friends of Wormwood Scrubs
Fruition Properties
Fulham Good Neighbours
Fulton Umbrellas

Organisation
Fund Analyst
Furness Primary School (London Borough of Brent)
Furniture
FX Rentals
Galicia Laundry
Game Arena
Gang of Virtue ltd
Garousca
Gateway Ltd.
Gemdale Corporation
Genesis Housing Association
Gensis Housing
Gensler
Gerald Eve LLP
Get Set Hire
GIA
Gingko Tree Investment Ltd
Giordani CafÃ©
GL Hearn
Glasgow Chamber of Commerce
Glenn Howells Architects
Global Cars
Global Guardians
Global Skills Centre
Globalcars
Glover
Golden Oriental Foods Limited
Golden Vans LTD
Goldman Sachs
Goldman Sachs International
Goldsmiths Residents Association
GP Supplies
GP SUPPLIES LTD
GPPUG
Graham & Green
Grainger plc
Grand Junction Arms
Grand Union Alliance
Great Hire
Greater London Authorithy
Greater London Authority
Greater London Authority - Local Nature Partnership

Organisation
Greenpol International
Grohe
Guiness
Guray Group
GVA
H&F
H.R. Owen
Haarlemmermeer
Habiteo
Hackney Council - Planning Policy Team
Halfords Autocentre
Hammersmith & Fulham CCG
Hammersmith & Fulham Liberal Democrats
Hammersmith and West London College
Hammersmith BID
Hammersmith London
Hammersmith Society
Hammersmith United Charities
Hamon Investment Group
Hampshire
Hanama Storage LTD
Handelsbanken
Hanger Hill (Ealing)
Hanger Hill East and Hanger Hilll Garden Estate Residents Associations
Hanger Hill Garden Estate Residents Association
Hanwell Hootie
Harlesden Neighbourhood Forum
Harlesden Town Team
Harlesdon Neighbourhood
Hart & Co
Hatton Metal Craft
Havering
Hawkeyesports
Hawkins/Brown
Hawthorn
HayesDavidson
Haymarket, Planning resource
HC Developments
Health and Safety Executive

Organisation
Health Watch Waltham Forest
Heathrow Airport
Hendon Motors
Hepher Grincell
Hertfordshire County Council
Hessar Trading LTD
Hickman Transport
Higgins
High Speed Two Limited
Highways Agency
Hill
Hilson Moran
Hilti (Gt. Britain) Ltd
Hilton
Hireman
Historic England
HLM
HM Printers LTD
HM Treasury
Hoare Lea LLP
Hodders Law
HOK
Holiday Inn
Holiday Inn Express
Homes and Communities Agency
Homey Well
Honey
Hospira
Hot Cam
Hot Flame
Hothouse 3D Scanning
Hotrod
House of Lords
Housewife Cash & Carry
Howard Kennedy
Howdens
Howes Percival Solicitors
Hoxton Beach
HPL
HR Owen
HS2
HT Drinks
HUAWEI TECHNOLOGIES (UK} CO., LTD.

Organisation
HubBox
Hyde Housing
Hyper Japan
Hyperoptic
Hyperoptic Ltd
I.S Ameen
Ian Marcus Consultants
iArchitecture
IBI GROUP
Iconic
IFC Group
iGym
IHSS
Il Fornaio
Imperial College
Imperial College London
Inbrit
Inclarity
Indigo Planning
Individual
ING• PR & COMMUNICATIONS
Inland Waterways Association
Innovate UK
INSTINCTIF
Institution of Civil Engineers
Intel Corporation
Internet Trade
Investin In Capital
Iraqi & Middle East Catering
Ironing Shop
Irwin Mitchell
Isabelle
Isle of Wight
Istanbul Metropolitan Muncipality
Italian Furniture, Carpet & Flooring
Ith Pharma
its Technology Group
I-UK
J A Glover Ltd - Ventilation Products
J.Y. Hancock & Associates Ltd
Jack Wills
Jamaice National Mobile Unit
Janelle's Floral Design

Organisation
Japan Centre
Japan Local Government Centre
Jascots WineMerchants
Jet Aero Fuels
JFC UK Ltd
JLL
JMP
jnpgroup
John F. Hunt
John Lewis
John McAslan + Partners
John McNulty
John Perryn Primary School (Ealing)
Jonathan Roberts Consulting
Jones Lang LaSalle Ltd
Jones Productions
JT Car Repairs
JTJ Workplace Solutions Ltd
Junction Local
Just Care Group
Just Space
K & D Carpets
Kakuei Printing
Kaye's Blinds & Curtains
KBM Chartered Accountants / Business School
KBR
Keltbray Ltd
Kenmont Primary School (London Borough of Hammersmith & Fulham)
Kensal Green Programme
Kensington Security Doors & Windows
Kent County Council
Keym
Kier Construction
King & Wood Mallesons
Kings College London
Kingston Council
Knowsley Council
Kohn Pedersen Fox Associates (KPF)
Kolak
Kotrak
KSR ARCHITECTS
KSS

Organisation
L&Q Group
La Cabana
La Maison
La Maison des Sorbets Foods Ltd
Labour MP for Hammersmith
Lahori Tikka Masala
Lance Box Group
Lancer Property
Land Lease
Land Securities
Language School
L'Aquila
LaSalle
LatinElephant
Laundry & Ironing
Lazenby
LDA
Le Pain Nouveau
Lebanese centre
Lebanese Centre LTD
Lebanos Food Trading
Leep
Lees BMW
Legal & General Investment Management
Lend Lease
Levy Real Estate LLP
Lewisham
LEXINGTON COMMUNICATIONS
Liberal Democrat Group
LIFE Residential
Lift People
Lincolnshire
Line Planning Ltd
Link Wholesalers
Livemore
Lloyds Banking
Lloyds Motor Spares
Lloyds PR
LMDS Foods
lmtech Traffic & Infra UK Ltd
lnfabode
Lobanan
Local Council

Organisation
Local Dialogue
Local Government Association
Local Res and FOWS
Local Resident
Lodestar
London & Continental Railways Limited
London & Regional Properties
London and Partners
London Assembly
London Borough of Barking and Dagenham
London Borough of Barnet
London Borough of Bexley
London Borough of Brent
London Borough of Bromley
London Borough of Camden
London Borough of Croydon
London Borough of Ealing
London Borough of Enfield
London Borough of Hammersmith & Fulham
London Borough of Hammersmith and Fulham
London Borough of Haringey
London Borough of Harrow
London Borough of Havering
London Borough of Hillingdon
London Borough of Hounslow
London Borough of Islington
London Borough of Lambeth
London Borough of Lewisham
London Borough of Merton
London Borough of Newham
London Borough of Redbridge
London Borough of Richmond
London Borough of Southwark
London Borough of Sutton
London Borough of Tower Hamlets
London Borough of Waltham Forest
London Borough of Wandsworth
London Borough of Wandsworth
London Chamber of Commerce And Industry
London Citizens

Organisation
London Docklands Development Corporation (former)
London Fire Brigade
London First
London Forum of Amenity & Civic Societies
London Forum of Amenity and Civic Societies
London Legacy Development Corporation (LLDC)
London Local Energy
London Mobility
London Sustainable Development Commission
London Tenants Federation / GUA
London Theatre Company
London Waterways Projects
London west Quakers
London Wildlife Trust
LondonBT Group
Longford Trust
Lotus Linens
Loubnan Natural Foods LTD
LP Construction Ltd.
LTF/Project worker for grand union alliance
LTS
Lucid
Luckshmee Limited
Luton
M & M Metalwork Ltd
Mace Group
Mackin Construction LTD
MadeByPi
Mak Automotive Co.
Make
Mama Youth Project
Mand Metal
MandG Investments
Marble Joinery
Marine Management Organisation
Marketing Derby
Martell Electronics Ltd
Mash

Organisation
Maxlight
Mayors Fund for London
MBA Architects Ltd
Medway
Medway Council
Mega Marble
MERC
Mercedes Benz Specialist
Metropolitan Police
Michael Brady LTD
Middle East Cargo Services
Middlesex Hose & Fittings LTD
Midland Terrace
Midland Terrace, Shaftsbury gdns,
Milton Investment
Milton Keynes
Minds LTD
Minerva Motors LTD
Mirrorstoke Ltd
Mishcon de Reya
Mitsubishi Estate London Limited
MM Couriers
Momentum
Montagu Evans
Motsen Group
Mott MacDonald
Mount Anvil
Mountain of Fire & Miracles
Movement Strategies
MP Morgan
Museum of London Archaeology (MOLA)
Nad Garage
Nadi Park Royal
Namaste Health & Wellbeing
Nandos
National Bargee Travellers Association
National Electrical
National Grid
National Lighting
Natural England
Natural History Museum
NDA Motors
Neighbour

Organisation
Network Homes
Network Rail
Network Rail, High Speed Rail Development
New Space Design LTD
Newman Francis
Newsfare
Nexus Planning
NHS
NHS England
NHS North West London (Collaboration of 8 CCGs)
Nichols
Nifeislife.com
NineElms
Nomadic Rug Gallery
Nomura Research Institute, Ltd
Norfolk County Council
North Kensington Gate
North Lincolnshire Council
North London Waste Plan
North Yorkshire County Council
Northamptonshire County Council
Northfields Estate Agent
Nosh CafÃƒÂ©
NQP Development Services
NRS
NSB Casements
OAOA LTD
Ocean Media
Oceanic Jewellers LTD
OCO
Off License
Offer Group LTD
Office Moving International
Office of Rail and Road
Officina Coppola
Ogilvie Geomatics Ltd
O'Herlihy & Co.
Old Oak / Mosaic Housing
Old Oak CafÃ© & Restraunt
Old Oak Estate resident
Old Oak Housing Association
Omega Bikes

Organisation
Omega Lettings
Onelansdowne / Guildhouse Rosepride
Only Connect and West London Zone
OOBE Ltd
Opticians
Options It
Optonica
Ordnance Survey
Orexis Fresh Food
Orsini Brewin
Outer London Commission (and OPDC Planning Committee)
Oxegen Freejumping
Oxfordshire County Council
PAF
Panalux
Panic Music
Paragon QMS
Park Royal Business Group Â
Park Royal Cars
Park Royal Mot Centre
Park Royal Post Office
Park Royal Studios
Park Royal Taxi Centre
Park Royal Timbers
Parklane Group
Partner Capital
patient participation group representing health services within the MDC boundary
Paul
Paul Vanstone Sculptures
Pauls Auto Repairs
pba
PCBS
PCSG
PDP London Architects
PDS
Peachcroft
Peal Windows
Peek and Rapkin Food Events
Pelicanbespoke
Pell Frischmann
Pentecostal City Mission Church

Organisation
People Of The Road
Perfect Crystal
Perfection Salon
Persia Food LTD
Persona Associates
Peter Brett
Peterborough City Council
PHE (London)
pi global - brand shaping specilists
Pit Start Garage
PJ Leonard Haulage LTD
Planning in London
Plastic Omnium
Plowman Craven
PLP / Architecture
Policy Studies Institute
Pollitt & Partners
Pomodoro
Portobello Fashion
Portsmouth
Portugalia Wines UK
Posh Dogs
Potter Raper Partnership
Powerday
Pramerica
Preedy Glass
Prefit
Premier Car Care Centre LTD
Premier Park Studios
Prime Light
Princes Trust
Pringle Brandon PW
Print Sign Design
Printhouse Corporation
Pro Health
Prokit
Promet Technology LTD
Promotive Chauffeurs London LTD
Property Investment & Development
Property Management
Property Week
Provectus Group
Providence Capital Management

Organisation
PSAV
PSB London Ltd
PUPDI
Qinetiq
QPR
Quad
Quatro Public Relations
Queens Park Rangers
Queens Rolla House
Quintessence
Quod
Rail Exec
Rainmaker Partners
Ramsay Shipping
RCKa architects
Reactive Group
Reading
Real Asset Partners
Realia Capital Management
Realized
Realopedia
Rebecula Consulting Limited
Recognition Express
RED
Red Creative
Red Line Car Services
Red Rose Bakery
Redbox
Reed Global
Reed in Partnership
Reed Midem
reForm
Regeneration Investments
Regent Gas
Regents Dry Cleaners
Regents Network
Regis
Reiach And Hall Architects
Reigate & Banstead
Renaissance Investment
Renault
Resapol
Resident

Organisation
Residential Edge
Residential Moorings Group
Resonance
Respect Care
Resurgence
Reverie Autos
revo seccus
Revolving Doors
RICS
Rise
RJ Patching
RL Designs
Robert Bird Group
Robson Walsh LLP
Rogers Stirk Harbour And Partners
Rolla Dome All Skate
Rosepride Limited
Roya Mail
Royal Albert Dock London
Royal Borough of Greenwich
Royal Borough of Kensington & Chelsea
Royal Borough of Kingston Upon Thames
Royal Borough of Windsor & Maidenhead
Royal Gourmet
Royal Holloway University of London
RPM LTD
RR Media
Rubbish Hunters
Rubbish Solutions
Ruffena Capital
Rustin Coffee / A E Stanton & Co
Ryder
Ryder Architecture Limited
S.Walsh & Son Ltd
SAC
Sainsburys
Sainsbury's
Salam Supermarket
Salon Services
Sami & Co Accountants Ltd
Sample Studio

Organisation
Savills
Savoir Beds
Scanprop Development, Stockholm
Scenario Architecture
School of Architecture & Planning
Schroder Real Estate Investment Management Limited
Schroders
Science Museum Group
Seaward Travel
SEGRO
Select Property Group
Semo Auto
Serco
Service Auto Romanesc
Shadow on Thames
Shahan Mobile
Shared Assets
Shepherd's Sandwich Bar
Sheppard Robson Architects
Shine Motors LTD
Show Reel
Shurgard
Shurgard Self Storage
Sickle Cell Society
Siemens
Sigma Capital Group Plc
Silver Spring Networks
Simon Bowden Architecture
Simply Fresh
Sinarmas Land
Sir Robert McAlpine Ltd.
SISK
Skanska
Skyline Campaign
Slough Borough Council
Small Back Room
Smartec Systems Ltd
Smith & Hunter Prime Car Care
Snobs Ultimate Customs
Solalights
Southend on sea
SP Broadway
Spanich Slate Quarries Ltd

Organisation
Sparks
Speciality Drink LTD
Speedy Assets Services
Spiros Motors
Sport England
Sports Dimension
Squint/opera
SSA Planning
SSC LTD
SSE
SSE Audio Group
ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM
Stadium Capital Holdings
Stand By Chef
StandByChef LTD
Stanhope plc
Starboard Hotels
STC
Steel Fabrications
Stellacom
Stephen Swords
Sterling Studios
Stewart Parvin
Stone World
STQW
Stratstone
Strongbase Construction LTD
Studio Bednarski ltd
Stuff 'u' sell
Sufflok
Sukarah
Sunbeam
Sunrise CafÃ©
Super Hire
Super Save
Supponor LTD
Surrey County Council
Sutton Council
Sweet Land
Symmetrys Limited
Szerelmey
T&S Enterprises
T&SEnterprises (London) Ltd.

Organisation
Taiko Foods
Talbot Scott
TeamWork Strategic Consultants
Telereal Trillium
Telford Homes
Temple Group
Tenpin Acton
Terence O'Rourke
Texaco Garage
Thai Design
Thames Valley Harriers / Linford Christie Stadium
Thames Water
The Architects' Journal
The Artisan Bakery Ltd
The Bartlett Centre for Advanced Spatial Analysis
The Castle Pub
The Coal Authority
The Collective
The Costume Store UAL
The Daylight Company Ltd
The First Mile
the First Mile ltd
The Foundary
The Hammersmith Society
The HOK Planning Group
The Hyde Group
The Land Trust
The London Bakery
The Olive Grows
The Organic Pharmacy
The Power Station
The Procurement Co
The Real Greek
The Restart Project
The Royal Bank of Scotland
The Safety Supply Company
The Soundhouse LTD
The Spice Land
The Transport Exchange Group
The Village Trading Store
Thesqua
Thompson Cole

Organisation
Thomson Motors Accidental REpair Centre
Thorp Technology Ltd
Thurrock Council
Tideway
Tim Spenser & Co
Tishman Speyer
TITRA
TM Forum
TM Plant
TOBIN Consulting Engineers (UK) Ltd
Tool Station
Topaz Detailing
Torpedo Factory Group
Torterolo & RE
Totality
Touchstone Worktops LTD
Tough Glaze
Town and Country Planning Association
Transcom Telecom Ltd
Transport for all
Transport for London
Transport for London, London River Services
Transptuc LTD
Travel Lodge
Traxden Motorcycles
Trinidad Roti Shop
Troop London
Trowers & Hamlins
Tucker-French
Turley
Turntown
Twin Sustainability Innovation
Twyford Abbey
Tyréns UK
U and I plc
U3A Southall
UBM
UCL
UCL and Just space
UCL Student
UEM SUNRISE
UK Power Networks

Organisation
UK Property Forums
UK Regeneration
UK Trade & Investment
UKTI British Consultate
Ullah Law Associates
Unbloc Drainage
Uni Trust
Uniform
Unit Trust Protection Services
United Biscuits
United Kingdom Tyre Exporters Ltd
UniTrust Protection Services (UK) Limited
Universal Display
Universal Motor Training
University College London
University of Brighton
University Of West London
Urban Land Institute
Urban Legacies Limited
Urben Studio
Useful Simple Projects
V9 Universal
Vale Europe Ltd
Vale Inco Ltd
Vastint
Vectos
Velocity
Veolia
Vibe Motors
Victoria Gardens Development LTD
Vigo Group
Village Urban Resorts
Virgin Media
Vivalda
VMI
Vodaphone
Vogan Capital LTD
Volterra
Voreda LLP
Wagstaffs Design Ltd
Wallace HGV LGV PCV Bus Coach Driver CPC Forklift Training
Wardwell Armstrong

Organisation
Warmup Plc
Watford Borough Coucil
WATG
Watkins Gray International LLP
Wawickshire County Council
Way On
Wazoku
wcec group ltd
WCRA
Wearefield
Well Working
Wellcome Trust
Wells House Road
Wesley Estate
Wesley Estate residents association
West Acton Residents Association
West Berkshire
West Creative
West Ealing BID
West London Alliance
West London Business
West London College
West London Line Group
West Sussex County Council
West Twyford Residents' Association
Westbourne
Westbrook Partners
Westbrook Properties
Western Riverside Waste Authority
Westfield
Westminster City Council
Weston Williamson+Partners
Westway Housing Association
Wet Design
Whitbread
White arkitekter
White Label
White Rose Laundries
Whitedrake
Wholesale & Retail
Wholesale All Bees
Wierzejki
Wild Blue Cohort

Organisation
Wiltshire Council
Wimshurst Pelleriti
Winser London
Wireless Infrastructure Group
Witteveen+Bos
Wokingham
Wokingham Borough Council
Wolseley
Women's Pioneer Housing
Woods Bagot
Worcestershire
Wormoholt and White City Neighbourhood Forum
Wormwood Scrubs Pony Centre
WSP Group
WSP Parsons Brickerhoff
Yumi
Zacharia
Zaha Hadid Architects
Zaid Star Quality
ZamZam Motors
Zen Builders
Zinc Design LTD

Appendix H

Copies of Regulation 19(1) Consultation Material

Email sent to all consultees on OPDC's consultation database

Public consultation for the Local Plan is now open | Can't see the images? View online

OPDC
OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION



Have your say on the Local Plan consultation for Old Oak and Park Royal

The public consultation on the revised draft Local Plan and associated documents runs from 29 June until midnight on 11 September 2017

OPDC is the Local Planning Authority for Old Oak and Park Royal. Part of our responsibilities includes the production of a Local Plan for this area.

The OPDC Local Plan is the key planning policy document and sets out OPDC's strategy for the sustainable development and regeneration of its area as a whole. It includes policies dealing with matters such as the delivery of new homes and jobs and new roads, rail stations, parks, schools, health centres

and utilities infrastructure. This includes consideration of the type, amount and location of new development that could take place and the policies used in determining planning applications that will shape how the area will be developed over the next 20 years.

The revised draft Local Plan is accompanied by a range of supporting studies that have shaped and support the policies being recommended for the area.

Revised draft Local Plan

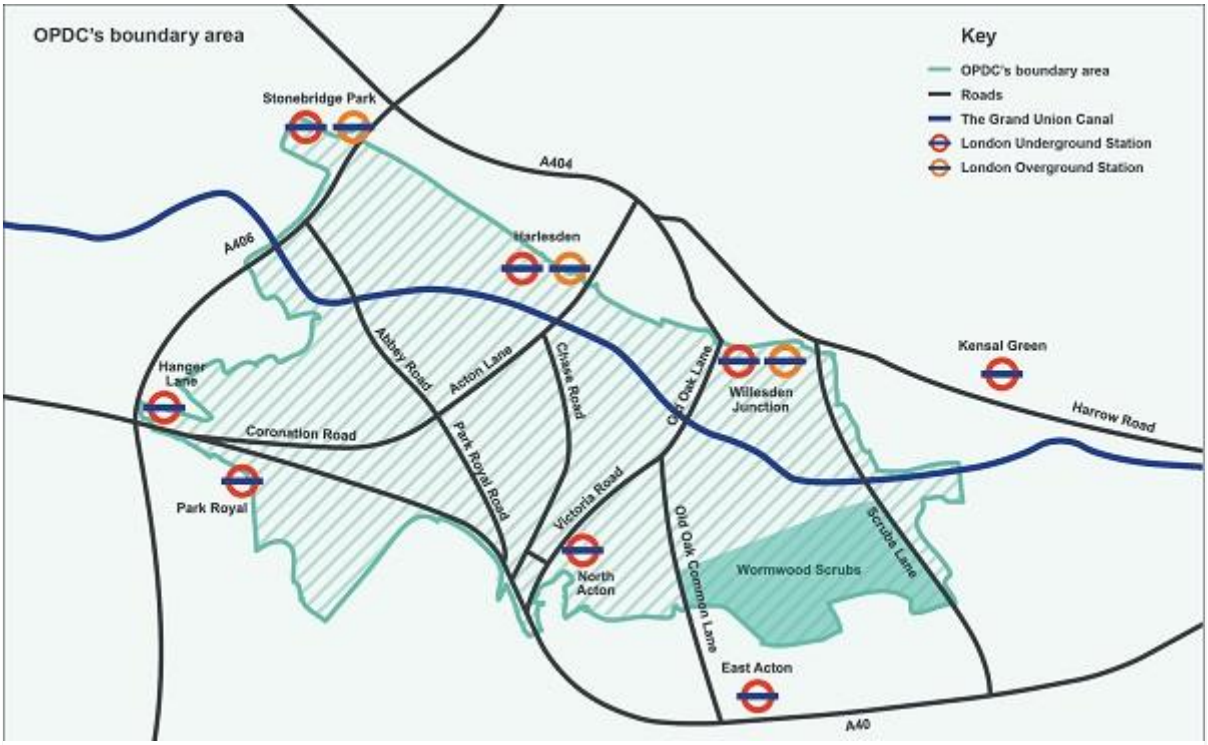
Thursday
29

Public consultation now open until 11 September
The document we are consulting on is the revised draft Local Plan (Regulation 19) and its associated supporting studies. The consultation closes at midnight on 11 September.

Have your say

- Further information on the stages of the Local Plan can be found online
- OPDC is also consulting on potential sites for inclusion on OPDC's Brownfield Land Register and the revised Validation Checklist

Read the revised draft Local Plan and Supporting Studies



The revised draft Local Plan and supporting documents may be viewed online or at the following locations during normal office hours:

- Brent Civic Centre, Engineers Way, Wembley HA9 0AF
- City Hall, Queens Walk, London SE1 2AA
- Ealing Council Offices, Perceval House, 14/16 Uxbridge Road W5 2HL
- Hammersmith Town Hall, King Street W6 9JU
- Harlesden Library, Craven Park Road NW10 8SE
- The CoClub, The Perfume Factory, 140 Wales Farm Road, North Acton W3 6UG

Alternatively, hard copies of the Local Plan can be made available on request by contacting OPDC either via email or by post.

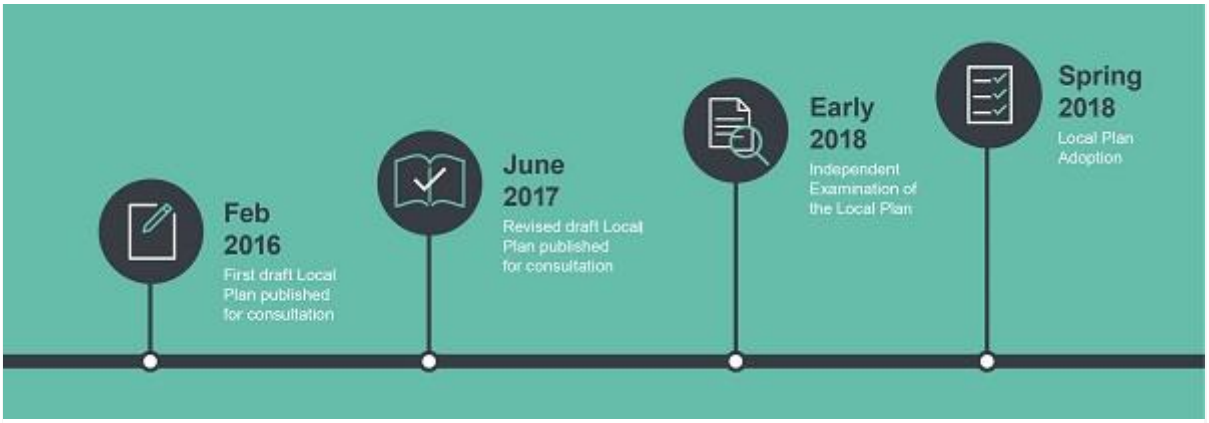
How to comment

To make comments on the revised draft Local Plan consultation, and associated documents, please use one of the following methods, providing your full name and contact details:

- **Online:** response form
- **Email:** localplan@opdc.london.gov.uk

- **Post:** Local Plan Consultation, Old Oak and Park Royal Development Corporation, City Hall, Queen's Walk, London SE1 2AA

Due to the process of having an Independent Examination, any information and/or responses made are not confidential. This means we need your name, or company name, so that the comments can be made available for the public inspection. Once your comments have been logged, all names, company names and associated comments submitted as part of the formal consultation process will be made available to view on the OPDC website. OPDC will not share or publish post codes or email addresses.



What to consider when responding

Responses provided as part of this consultation should consider whether the plan meets legal and procedural requirements, the Duty to Co-operate and whether it is 'sound', and the reasons why. Please see further detail on these criteria.

Find out more, including how to be informed at future stages

Come along to a consultation event

Dates throughout

We're hosting a series of drop in sessions and presentation events during the consultation

July

If you're not able to come to an event in July, we're also holding two live Twitter sessions on Tuesday 18 July and Tuesday 5 September, both at 1.00pm to 2.00pm. You can talk to us using #OPDClocalplan.

Register to attend a consultation event

Date and Time	Event details	Location
Wednesday 5 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **spatial vision and place policies**.	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG
Monday 10 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **housing policies**.	City Mission 2 Scrubs Lane NW10 6RB
Saturday 15 July Drop in from 10.00am - 2.00pm	**Drop in** An opportunity to talk to OPDC officers, view information boards and respond to the consultation.	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG
Wednesday 19 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **social infrastructure and open space policies**.	The Collective Old Oak Lane NW10 6FF
Thursday 20 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **employment and town centre policies**.	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG
Monday 24 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **transport policies**.	City Mission 2 Scrubs Lane NW10 6RB
Wednesday 26 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **design and environment policies**.	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG

#OPDClocalplan



Contact us

Old Oak and Park Royal Development Corporation (OPDC), City Hall, The Queen's Walk, London SE1 0LL

Useful links

Visit website
Send to Friend
Unsubscribe

This message has been scanned for viruses by the Greater London Authority.

Click here to report this email as spam.

Copy of letter send to local residents and businesses

OPDC
OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION

City Hall
The Queen's Walk
More London
London SE1 2AA
020 7983 5732
www.london.gov.uk

29 June 2017

Dear occupant

Have your say on how the Old Oak and Park Royal Development Corporation (OPDC) promote and guide development and regeneration in the area.

OPDC is the local planning authority for Old Oak and Park Royal. Part of our responsibilities includes the production of a revised draft Local Plan for this area.

The revised draft Local Plan sets out a series of planning policies to help shape the development of the area over the next 20 years. We are starting a public consultation on OPDC's revised draft Local Plan for the area. The legal requirements and technicalities regarding the revised draft Local Plan are set out below. We have also enclosed a leaflet, that we hope will better inform and enable you to have your say in the future of Old Oak and Park Royal.

Alongside the revised draft Local Plan, OPDC is also consulting on a revised Validation Checklist and potential sites for inclusion on OPDC's Brownfield Land Register (BLR).

A Validation Checklist sets out the documents that planning applicants must submit as part of their application in order for it to be valid. National Planning Practice Guidance (14-043-20140306) requires local planning authorities to review their Validation Checklist at least every 2 years. OPDC is taking this opportunity to consult on this list in order to align it to the requirements of the revised draft Local Plan.

The Government now requires all local planning authorities to publish a BLR, which identifies areas of previously developed land that could be available for development. OPDC's Development Capacity Study forms a key part of the evidence base for the revised draft Local Plan. It is intended that this study will form the basis for the publication of Part 1 of the BLR, in accordance with Town and Country Planning (Brownfield Land Register) Regulations 2017.

Further details on the revised Validation Checklist and BLR consultations can be found on OPDC's website. Responses to both of these can be submitted via the online form, email and postal address set out below.

PUBLIC CONSULTATION
(Revised draft Local Plan)
Planning and Compulsory Purchase Act 2004 and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 – Revised Draft Local Plan for the Old Oak and Park Royal Development Corporation

Notice is hereby given, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 that the Old Oak and Park Royal Development Corporation (OPDC) has produced a revised draft version of the Old Oak and Park Royal Local Plan for public consultation.

Title of the Document:
The OPDC revised draft Local Plan.

Purpose of the document:
OPDC's Local Plan is the key planning policy document for the OPDC area (as shown on the map in the

enclosed leaflet). It contains policies that, together with the London Plan, the National Planning Policy Framework and any related policy and guidance documents, will be used in determining planning applications and will shape how the area will be developed and regenerated over the next 20 years.

This document is the Regulation 19 draft of the Local Plan. The first draft of the Local Plan, known as the Regulation 18 draft, underwent public consultation in February – March 2016. The responses to the consultation have informed the production of this revised draft Local Plan.

Subject Matter and Area of the Development Plan Document:
The revised draft Local Plan includes policies dealing with matters such as the delivery of new homes and jobs and new roads, rail stations, parks, schools, health centres and utilities infrastructure. It is accompanied by a range of supporting studies that support the policies being recommended for the area. The Local Plan covers the whole of the OPDC's boundary area.

Period within which representations and responses need to be made:
Thursday 29 June 2017 until midnight on Monday 11 September 2017.

How to comment and have your say:
Make comments on the revised draft Local Plan, and associated documents (including the revised Validation Checklist and Development Capacity Study, containing BLR information), using one of the following methods, providing your full name and contact details:

- **Online response form:** www.bit.ly/OPDCReg19
- **Email:** localplan@opdc.london.gov.uk
- **Post:** Local Plan Consultation, OPDC, City Hall, Queen's Walk, London SE1 2AA

Want to be kept informed about the next stages?
You can ask to be notified at a specified address for any of the following:

- When we submit the policies for independent examination;
- When the Inspector publishes his/her comments; and/or
- When the policies have been adopted.

How to find out more:
The revised draft Local Plan and supporting documents may be viewed online at: www.london.gov.uk/OPDClocalplan or at the following locations during normal office hours:

- Brent Civic Centre, Engineers Way, Wembley HA9 0AF
- City Hall, Queens Walk, London SE1 2AA
- Ealing Council Offices, Perceval House, 14/16 Uxbridge Road W5 2HL
- Hammersmith Town Hall, King Street W6 9JU
- Harlesden Library, Craven Park Road NW10 8SE
- The CoClub, The Perfume Factory, 140 Wales Farm Rd, North Acton W3 6UG

Alternatively, hard copies of the revised draft Local Plan can be made available on request by contacting OPDC, either via email or by post (see above).

Further details on the purpose of the Local Plan, how to respond and details for our drop in and presentation events can be found in the enclosed leaflet. Alternatively, please contact OPDC via email localplan@opdc.london.gov.uk or on 020 7983 5732.

Yours sincerely,



Tom Cardis
Head of Planning Policy
Old Oak and Park Royal Development Corporation

Copy of leaflet send to local residents and businesses

OPDC
OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION

Have your say on the Local Plan for Old Oak and Park Royal

A once in a lifetime regeneration and development project to create a new place for all Londoners



The Old Oak and Park Royal Development Corporation (OPDC) was established by the Mayor of London in April 2015 to oversee the delivery of 25,500 new homes and generate 65,000 new jobs for London.

25,500
New homes for Londoners

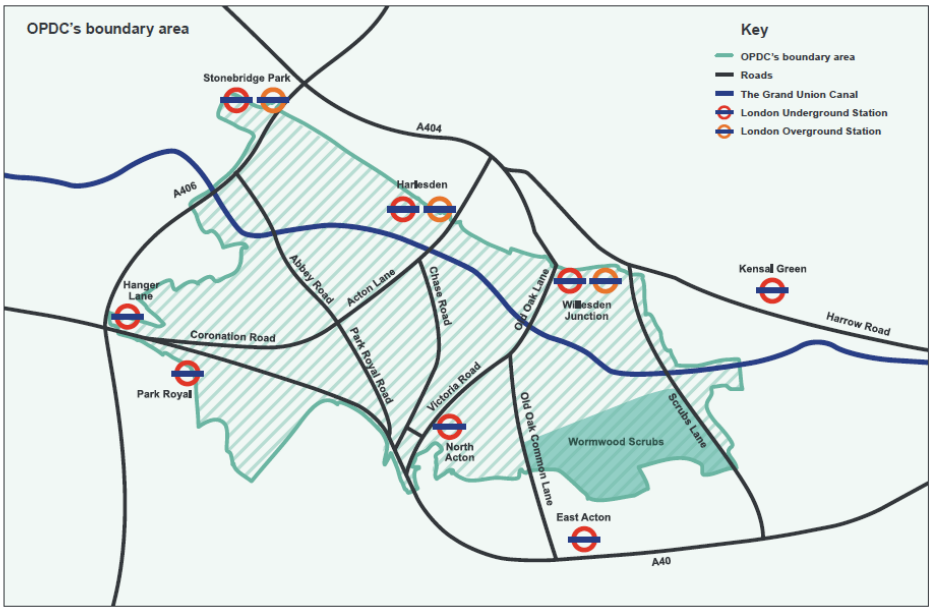
New health centres, sports and community facilities and schools

Protecting and strengthening Park Royal

Over the next few decades, we want to make sure that both current and future residents and businesses benefit from the significant investment in the area by High Speed 2 (HS2) and the Elizabeth Line (formerly named Crossrail).

As the local planning authority for the area, we'll build on this investment by:

- transforming and developing the Old Oak area - one of London's most inaccessible areas into a well-connected, world-class transport interchange
- enabling delivery of new housing and commercial development, surrounded by sustainable and thriving neighbourhoods and valued amenity space
- protecting, strengthening and intensifying Park Royal for industrial uses
- protecting and sensitively improving Wormwood Scrubs common and the Grand Union Canal



What's the purpose of the Local Plan?

OPDC is the local planning authority for Old Oak and Park Royal and is responsible for the production of a Local Plan for this area.

The OPDC Local Plan will cover the next 20 years and sets out OPDC's strategy for the sustainable development and regeneration of its area as a whole. This will include consideration of the type, volume and location of new development that could take place and the policies to which applications for planning permission need to conform.

The Local Plan includes a range of policies dealing with matters such as the delivery of new homes, jobs, streets, rail stations, parks, schools, health centres and utilities infrastructure. It is accompanied by supporting studies that support the policies being recommended for the area.

In particular, the Local Plan sets out how regeneration should deliver a highly connected part of London and create a great place to live, work and visit. This document will play an important role in shaping west London's future and help to drive national economic growth.

The Local Plan will demonstrate how the development and regeneration in the area should look to pioneer excellence in sustainability, health and wellbeing, design quality and deliver tangible benefits to both local communities and London as a whole.



Details on where you can view the Local Plan and its associated studies can be found online at: www.london.gov.uk/OPDClocalplan

The stages of creating a Local Plan for Old Oak and Park Royal

The document we are consulting on and want your views to is the revised draft of the Local Plan.

The first draft of the Local Plan underwent public consultation in February – March 2016. We received over 2,000 responses from this consultation which were vital to creating this latest version of the Local Plan.

Projected stages of the OPDC Local Plan:

- **Feb 2016** – First draft Local Plan published for consultation
- **June 2017** – Revised draft Local Plan published for consultation
- **Early 2018** – Independent Examination of the Local Plan
- **Spring 2018** – Local Plan Adoption

Independent Examination

OPDC is required to submit the Local Plan to the Secretary of State for an Independent Examination. This process involves an independent inspector, appointed by the Secretary of State, whose role in the examination process is to assess whether the Local Plan has been prepared in accordance with:

- Duty to Cooperate (a duty to try and agree approaches with key public sector bodies on strategic cross boundary matters)
- legal and procedural requirements
- whether it is 'sound' (see box below)

As part of this Independent Examination the following criteria will be used for the policies in the revised draft Local Plan:

Positively Prepared: The Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective: The plan should be deliverable over its period based on effective joint working on cross-boundary strategic priorities.

Consistent with National Policy: The plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and the supporting National Planning Practice Guidance.

We want to hear your views

The revised draft Local Plan is now ready for the next consultation phase and we would like to hear from you before it is submitted to the Secretary of State for an Independent Examination.

When responding to this consultation, please use the criteria (as outlined under the Independent Examination section) to demonstrate whether you think that the policies in the revised draft Local Plan have been positively prepared, justified, effective and/or are consistent with national and regional policy and the reasons why.

Hard copies of the revised draft Local Plan are also available for public inspection, get in touch for more information.

How to make a comment:

To make comments on the revised draft Local Plan, and associated documents, please use one of the following methods, providing your full name and contact details, from 29 June to midnight on 11 September 2017:

- **Online response form: www.bit.ly/OPDCReg19**
- **Email: localplan@opdc.london.gov.uk**
- **Post: Local Plan Consultation, Old Oak and Park Royal Development Corporation, City Hall, Queen's Walk, London SE1 2AA**

How your information will be used

Due to the process of having an Independent Examination, any information and/or responses made are not confidential. This means we need your name, or company name, so that the comments can be made available for the public inspection. Once your comments have been logged, all names, company names and associated comments submitted as part of the formal consultation process will be made available to view on the OPDC website. OPDC will not share or publish postcodes or email addresses.

Come along to one of our consultation events

OPDC is hosting a series of drop in and presentation events during the consultation. If you would like to attend, register at: www.bit.ly/OPDCReg19events

Wednesday 5 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **spatial vision and place policies**.	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG
Monday 10 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **housing policies**.	City Mission 2 Scrubs Lane NW10 6RB
Saturday 15 July Drop in from 10.00am - 2.00pm	**Drop in** An opportunity to talk to OPDC officers, view information boards and respond to the consultation.	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG
Wednesday 19 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **social infrastructure and open space policies**.	The Collective Old Oak Lane NW10 6FF
Thursday 20 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **employment and town centre policies**.	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG
Monday 24 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **transport policies**.	City Mission 2 Scrubs Lane NW10 6RB
Wednesday 26 July Drop in from 6.00pm - 6:45pm Join us for the presentation at 7.00pm - 8:30pm	**Drop in and presentation** An opportunity to talk to OPDC officers, view information boards and respond to the consultation. The presentation will focus on the Local Plan's **design and environment policies**.	The CoClub The Perfume Factory 140 Wales Farm Road W3 6UG

If you are not able to come to an event, we will also be holding two live Twitter sessions on Tuesday 18 July and Tuesday 5 September, both at 1.00pm – 2.00pm. You can talk to us then using #OPDCLocalPlan.

Contact us:

@OldOakParkRoyal
facebook.com/OldOakParkRoyal
info@opdc.london.gov.uk
020 7983 5732
london.gov.uk/opdc

Copy of public notice placed in local newspapers

PUBLIC CONSULTATION
(Revised Draft Local Plan)
Planning and Compulsory Purchase Act 2004 and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 – Revised Draft Local Plan for the Old Oak and Park Royal Development Corporation

Notice is hereby given, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 that the Old Oak and Park Royal Development Corporation (OPDC) has produced a revised draft version of the Old Oak and Park Royal Local Plan for public consultation.

Alongside the revised draft Local Plan, OPDC is also consulting on a revised Validation Checklist and potential sites for inclusion on OPDC's Brownfield Land Register (BLR).

Title of the Document:

The OPDC revised draft Local Plan.

Purpose of the document:

OPDC's Local Plan is the key planning policy document for the OPDC area. It contains policies that, together with the London Plan, the National Planning Policy Framework and any related policy and guidance documents, will be used in determining planning applications and will shape how the area will be developed over the next 20 years.

This document is the Regulation 19 Draft of the Local Plan. The first draft of the Local Plan, known as the Regulation 18 draft, underwent public consultation in February – March 2016. The responses to the consultation have informed the production of this revised draft of the Local Plan.

Subject Matter and Area of the Development Plan Document:

The revised draft Local Plan includes policies dealing with matters such as the delivery of new homes and jobs and new roads, rail stations, parks, schools, health centres and utilities infrastructure. It is accompanied by a range of supporting studies that support the policies being recommended for the area. The Local Plan covers the whole of the OPDC's administrative area.

Period within which representations and responses need to be made:

Thursday 29 June 2017 until midnight on Monday 11 September 2017.

How to comment and have your say:

To make comments on the revised draft Local Plan, and associated documents (including the revised Validation Checklist and Development Capacity Study containing BLR information), please use one of the following methods, providing your full name and contact details:

- Online response form: www.bit.ly/OPDCReg19
- Email: localplan@opdc.london.gov.uk
- Post: Local Plan Consultation, Old Oak and Park Royal Development Corporation, City Hall, Queen's Walk, London SE1 2AA

Want to be kept informed about the next stages?

You can ask to be notified at a specified address of any of the following:

- When we submit the policies for independent examination;
- When the Inspector publishes his/her comments; and/or
- When the policies have been adopted.

How to find out more:

The revised draft Local Plan and supporting documents may be viewed online at: www.london.gov.uk/OPDClocalplan or at the following locations during normal office hours:

- Brent Civic Centre, Engineers Way, Wembley HA9 0AF
- City Hall, Queens Walk, London SE1 2AA
- Ealing Council Offices, Perceval House, 14/16 Uxbridge Road W5 2HL
- Hammersmith Town Hall, King Street W6 9JU
- Harlesden Library, Craven Park Road NW10 8SE
- The CoClub, The Perfume Factory, 140 Wales Farm Rd, North Acton W3 6UG

Alternatively, hard copies of this Local Plan can be made available on request by contacting OPDC, either via email or by post (see above).

Further details on the purpose of the Local Plan, how to respond and details on drop-in and presentation events can be found on OPDC's website. Alternatively, please contact OPDC via localplan@opdc.london.gov.uk or on 020 7983 5552.

Twitter and Facebook posts promoting the first Regulation 19 consultation



