

Consultation Statement June 2022

Waste Management in High Density Development and Passive Energy Performance, Daylight and Overheating in High Density Development Supplementary Planning Documents (SPDs)

1. Introduction

- 1.1 The Consultation Statement has been prepared in accordance with Town and Country Planning (Local Planning) (England) Regulations 2012 to support the adoption of the Waste Management in High Density Development and Passive Energy Performance, Daylight and Overheating in High Density Development Supplementary Planning Documents (SPDs).
- 1.2 In accordance with the Regulations, this consultation statement sets out:
- who was consulted during the preparation of the SPD,
 - how they were consulted,
 - a summary of the main issues raised during the consultation,
 - how those issues have been addressed in the adopted SPD.

2. Public Consultation Process

- 2.1 The draft SPDs were produced during late 2018. In developing the draft SPDs, OPDC undertook informal engagement with a number of key stakeholders to inform their scope and structure. This included the three host local authorities, the Greater London Authority, the Environment Agency and Natural England.
- 2.2 In December 2018, OPDC's Planning Committee unanimously approved public consultation on the two draft SPDs. Public Consultation took place between 10 January to 22 February 2019.
- 2.3 The SPDs and their supporting documents were published on OPDC's webpages and hard copies were provided in the following local venues:
- 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
- 2.4 Public notices were published in local newspapers and emails were sent to contacts on OPDC's consultation database, which included public authorities, developers and landowners, interest groups, residents groups and residents.
- 2.5 Two presentation events were hosted during the public consultation period so that communities could find out more about the SPDs, speak to OPDC officers and find out how to respond to the public consultation.

Date and time	Venue
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Saturday 19 January 2019 11.00am to 1.00 pm	The Collective Old Oak Lane NW10 6FF
Tuesday 5 February 6.00pm to 8.00pm	All Souls Church, Station Road, Harlesden NW10 4UJ

- 2.6 Comments on the SPDs were able to be provided by email and post and stakeholders were also provided with a telephone number and email address in order to ask OPDC officers and questions ahead of submitting a formal response to the public consultation.

3. Public consultation responses

- 3.1 Four stakeholders submitted consultation responses on the Waste Management in High Density Development SPD. 19 individual issues were raised across these four submissions. Table 1 below sets out the who raised the issue, the issue and a response from OPDC. If an amendment to the SPD has been made, an amendment reference has been included which corresponds with the track changed version of the SPD which can be found on OPDC's website with the other SPD documents.
- 3.2 Six stakeholders submitted consultation responses on the Passive Energy Performance, Daylight and Overheating in High Density Development SPD. 46 individual issues were raised across these six submissions. Table 2 below sets out the who raised the issue, the issue and a response from OPDC. If an amendment to the SPD has been made, an amendment reference has been included which corresponds with the track changed version of the SPD which can be found on OPDC's website with the other SPD documents.

4. Consultation on the SEA Screening

- 4.1 As part of the process for developing the Waste Management in High Density Development and Passive Energy Performance, Daylight and Overheating in High Density Development SPDs, an assessment of the requirement for a Strategic Environmental Assessment (SEA) was needed. Screening consultations were undertaken to enable the Environmental Bodies as specified in section 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 to provide comment on the appropriateness of the screening process and its conclusion for this proposed SPDs.
- 4.2 Those bodies are:
- Natural England,
 - Historic England and the
 - Environment Agency
- 4.3 Other bodies were specifically invited to comment:
- London Boroughs of Brent, Ealing, and Hammersmith and Fulham;
 - Greater London Authority;

- 4.4 Consultation on the Waste Management in High Density Development SPD screening was undertaken between 19th October 2018 to midnight on 26th November 2018 and consultation on the Passive Energy Performance, Daylight and Overheating in High Density Development SPD was undertaken between 10 January 2019 to midnight on 22 February 2019.
- 4.5 One response was received to these consultations from Natural England stating that for both SPDs they had no comments to make on the consultation.
- 4.6 OPDC's Determination Statement for the two SPDs (which can be viewed on OPDC's website along with the other SPD documents) confirms that the SPDs will not change or introduce new planning policy over and above the Local Plan and, whilst there may be some environmental effects, these have already been covered in principle in the Integrated Impact Assessment of the Local Plan.

Table 1: Public consultation comments and OPDC response on the Waste Management in High Density Development SPD

Comment reference	Modification reference (if relevant)	Stakeholder	Comment	Response
1	N/A	Historic England	We are concerned about the definition of Tall Buildings outlined in paragraph 3.3. This stems from our previous comments (dated 30/07/2018) on the draft Local Plan itself which has been submitted for examination and so we reiterate them here. ag With regards to the definition, we would encourage you to consider a contextual approach to a definition as advocated by part A of draft London Plan policy D8 (Tall Buildings). It is assumed however that the SPD will reflect whatever definition is found to be sound in the Local Plan examination and recognise that it is proper for the SPD to use the same definition	No Change proposed. As noted in the comment, the tall buildings definition is a matter for the Local Plan to define and it cannot differ within this SPD.
2	N/A	Historic England	We do support paragraph 3.2 which will ensure high density development reflects identified sensitivities	Noted.
3	N/A	Historic England	Where external waste deposit equipment and bin stores are to be used we encourage you to ensure that the SPD requires decisions regarding siting, design and associated signage to take into account the impacts upon the public realm and historic environment where relevant.	No change proposed. The requirements for bin stores to be off-street and therefore minimise impact on the public realm and historic environment are contained within Principle W1 i).

4	N/A	Canal and River Trust	We suggest that this document provides an opportunity to establish a requirement for new developments to provide adequate waste disposal and recycling facilities (and management strategies) for users of the public realm / green infrastructure / blue infrastructure. The Trust is keen to avoid more wind-blown litter and poor quality environments along the Grand Union Canal as a result of increased numbers of users and inappropriate facilities. The Trust considers that where new development brings increased numbers of people to an area, this requirement is met by developers.	No change proposed. This SPD deals specifically with requirements for bin provision provided as part of developments. Principle W1 k) requires developments to ensure that developments provide and maintain a positive visual amenity i.e. tidy and clean waste management areas, with an absence of spillages or uncontained waste around and within bins and bin stores. The forthcoming Public Realm and Green Infrastructure SPD will also be providing guidance for bin provision within the public realm.
5	N/A	Canal and River Trust	Designing bin stores for boaters into new developments is likely to lead to a better quality local environment.	Noted. The need for infrastructure for boaters is dealt with in Policy P3 (Grand Union Canal) in OPDC's Local Plan and where boating facilities are being delivered alongside development, the opportunities for co-locating bin stores can be considered.

6	14	London Borough of Brent	The guidance provides a useful summary of the pros and cons of different waste management approaches and explanation of how to calculate waste arising. However, it is noted it does not strongly point to one preferred solution for waste collection. There is an opportunity to promote one main method of waste collection across Old Oak, and in doing so benefit from co-ordinated management arrangements and reduced vehicle movements.	Change proposed. It is not considered appropriate at this point for the SPD to specify a preferred waste collection technology across the entire OPDC area, especially where systems like Envac and underground collection would require significant up-front infrastructure to be delivered at significant cost. It may be appropriate for place-based SPDs to set a preference and this would be considered as place-based SPDs are progressed. However, a principle has been added to Principle W1 requiring developers to engage early with waste operators and OPDC to potentially adopt a strategic waste technology system where one has been established.
7	N/A	London Borough of Brent	The Envac system in Wembley is an example of how an automated waste collection system in a mixed-use development can help to overcome some of the challenges associated with waste collection in high density development as identified in the SPD. Benefits include savings on storage space; reduced traffic impacts due to there being a single point of waste collection for the operator; and increased recycling rates.	Noted. The Envac system at Wembley is referenced in the SPD.

8	14	London Borough of Brent	Automated waste collection is more effective in growth areas and opportunity areas due to economies of scale. To enable such a scheme, OPDC should consider requiring developments to be designed to connect to an automated waste collection system, unless there is strong justification why this is not feasible. This would need to be subject to discussions with the relevant waste collection authority.	Change proposed. It is not considered appropriate at this point for the SPD to specify a preferred waste collection technology across the entire OPDC area, especially where systems like Envac and underground collection would require significant up-front infrastructure to be delivered at significant cost. It may be appropriate for place-based SPDs to set a preference and this would be considered as place-based SPDs are progressed. However, a principle has been added to Principle W1 requiring developers to engage early with waste operators and OPDC to potentially adopt a strategic waste technology system where one has been established.
9	20	London Borough of Brent	para 4.11 - Explanation of macerator needed here or in glossary.	Change proposed. Macerator has been added to the glossary.

10	14	London Borough of Brent	Para 5.26 - As stated above, based on the useful analysis the SPD should identify a preferred approach to waste management. From Brent's perspective underground and pneumatic waste collection would be the preferred approach for the majority of Old Oak, as this could help to reduce pressure on the road network.	Change proposed. It is not considered appropriate at this point for the SPD to specify a preferred waste collection technology across the entire OPDC area, especially where systems like Envac and underground collection would require significant up-front infrastructure to be delivered at significant cost. It may be appropriate for place-based SPDs to set a preference and this would be considered as place-based SPDs are progressed. However, a principle has been added to Principle W1 requiring developers to engage early with waste operators and OPDC to potentially adopt a strategic waste technology system where one has been established.
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11	16, 17 and 18	London Borough of Brent	<p>Table 5.5 - Some of the relative merits listed here are not merits. For example, potential for odour issues in food waste.</p> <p>Other advantages for automated waste systems include that they can increase recycling rates in high density developments. This has been the case in Wembley where a recycling rate of 40% has been achieved where Envac is in place, which is above the current borough average. Although it should be caveated this is subject to educating users and incorrect usage can lead to contamination of a significant quantum of waste</p>	Change proposed. The title has been changed from 'relative merits' to 'relevant considerations' and the positives for the pneumatic waste collection system have been added.
12	N/A	Grand Union Alliance	<p>The present systems are clearly not working: waste spills out into access and amenity areas of dense developments ,and not so dense ones; systems break down or are overloaded; unaffordable service/collection charges are imposed; infrequent and inadequate collections; multiple and confusing sorting for recycling; arrangements unfamiliar to populations characterised by churn or indifference; large items not dealt with leading to fly tipping; very low rates of recycling in flats with insufficient space for sorting/storage; inappropriateness for users, particularly residents and small businesses; over reliance on high standards of personal behaviour and practice; new technologies, products and consumables complicating matters.</p>	Noted. The challenges with existing approaches to managing waste are referenced in section 3 of the report.

13	N/A	Grand Union Alliance	The challenges of present system failings and current and proposed policy targets and ambitions are recognised by the individuals and community groups that make up the Grand Union Alliance. We welcome, in principle, policy and guidance that requires development designers and promoters to tackle waste management at the initial design stage of the development process; that sets out model approaches and standards that will optimise waste management. That this maximises the fulfilment of the waste hierarchy, provides a safe, efficient and convenient system for users, contributes to the transition to a low carbon and Circular Economy, including meeting the relevant targets of the Mayor, all as part of the achievement of sustainable development.	Noted.
14	N/A	Grand Union Alliance	The 'tests' for the effectiveness and appropriateness of this SPD are, therefore, essentially those that remedy existing system failings and meet the challenges set out above. The OPDC should reflect on whether the scope and content does this.	No change proposed. OPDC considers the scope and content of the SPD appropriately addresses the challenges that have been identified.
15	N/A	Grand Union Alliance	It almost goes without saying that the need for this SPD in part comes from the OPDC's choice of building typology; that is tall, super density and intense developments. The resulting consequence is that it is axiomatic and self-fulfilling that there are issues around waste management that need to be resolved. Complicated technologically advanced systems, yet unproven at scale, with all the attendant issues magnified, namely cost, unreliability, unaffordability etc. have to be advanced. A more moderate density/intensity, for example, may be an alternative approach to securing liveable places, homes and workspaces.	No change proposed. It is beyond the scope of this SPD to propose different densities. This was a consideration for the Local Plan and the examination. That said, achieving recycling rates even at lower densities is proving to be challenging and the guidance within this SPD will be applied to lower density schemes as well as those at high densities incorporating tall buildings.

16	N/A	Grand Union Alliance	Given the ambition to report Management Information on the amount and type of waste generated, as part of the Post Occupancy Evaluation Studies, ensure that user satisfaction and operational performance of the waste management systems is evaluated. That it is an iterative process whereby the learnings are fed back into the OPDC's guidance.	Noted. The purpose of the post-occupancy surveys would be to constantly learn and improve on guidance.
17	N/A	Grand Union Alliance	It is planned that even the high density intense developments will have soft landscaping. It appears that the SPD does not address this and that resulting 'green' waste, litter and fly tipping will be dealt with by the maintenance contractors independent of the proposed waste systems.	No change proposed. This SPD deals specifically with requirements for bin provision provided as part of developments. Principle W1 k) requires developments to ensure that developments provide and maintain a positive visual amenity i.e. tidy and clean waste management areas, with an absence of spillages or uncontained waste around and within bins and bin stores. The forthcoming Public Realm and Green Infrastructure SPD will also be providing guidance for bin provision within the public realm.
18	N/A	Grand Union Alliance	In response to the invitation by OPDC officers at the public consultation events, that wider ranging comments on waste management in the area be communicated: The Grand Union Alliance observes that the SPD is only part of the action that the OPDC should be taking to ensure satisfactory waste management in its area. We do appreciate that the OPDC is not the waste authority for the area, but there is a need to tackle the issues confronting local residents and businesses, that the actions of local boroughs/waste authorities are already inadequate and will be put under inordinate strain as a result of	Noted.

			the scale of development proposed for Old Oak and Park Royal.	
19	N/A	Grand Union Alliance	Additionally, the GUA asks that businesses, particularly in the Park Royal area should have their needs attended to and that this is addressed in the Park Royal Regeneration Strategy.	Noted. Commercial and industrial waste is collected by private companies. However, Policy EU6 in OPDC's Local Plan is applied to proposals to ensure that commercial or industrial schemes are appropriately managing waste and according with the Mayor's waste hierarchy. Further guidance on waste management for industrial premises will be provided within OPDC's forthcoming Industrial SPD.

Table 2: Public consultation comments and OPDC response on the Passive Energy, Daylight and Overheating in High Density Development SPD

Comment reference	Modification reference (if relevant)	Stakeholder	Comment	Response
1	16	London Borough of Brent	Residential Development and Non – residential development tables - an explanation of paragraph colour coding is needed.	Change proposed. A table has been added at paragraph 4.2 to explain what the colour coding represents.
2	28	London Borough of Brent	Para 5.24 states that: “Single aspect one bed units potentially preferred in this context but needs consideration against wider policy objectives”. This does not take into account the cooling effects of genuinely dual aspect dwellings and is contrary to wider policy objectives (incl. London Plan). This sentence should be omitted.	Change proposed. Policy D6 in the London Plan provides for the potential for single aspect dwellings where it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating. This guidance is providing advice for the most suitable location for single aspect dwellings - however the wording has been amended to make it clearer that this is only if single aspect are necessary for other reasons.
3	8	London Borough of Hammersmith and Fulham	Para 1.10 should also reference the OPDC Air Quality Study, June 2018 and GLA energy assessment guidance, October 2018.	Change proposed. Reference to these have been added.
4	13	London Borough of Hammersmith and Fulham	Para 3.1 - Initially confused about the reference to “Zone 2/3” as I was thinking about flood risks! Perhaps say “Travel Zone 2/3”?	Change proposed. Text has been added to clarify that this is travel zones.

5	30	London Borough of Brent	Figure 5.2 - Text difficult to read. Larger font size needed. A dual aspect compliant layout is needed here.	Change proposed. The figure has been made a full page image so the text is larger.
6	N/A	London Borough of Brent	Glossary, Well Building Standard - For ease of reference the link to Well-building standard guidance should also be included here.	No change proposed. It is considered the people would be easily able to find the standard via a search engine and that weblink may become obsolete.
7	29	London Borough of Brent	Para 5.32 states that "Dual aspect units have a higher risk of overheating." This generalisation is incorrect and should be omitted.	Change proposed. The sentence should have said that this relates to corner flats on the south-west elevations. The text has been amended accordingly.
8	31	London Borough of Brent	Figure 5.3 - There could be a conflict in the recommended glazing ratio depending on whether the assessment is based on unit size or solar exposure. In the case of a 2 bedroom single aspect flat in a shaded location, based on unit size glazing ratio should be 15% to 25% of internal floor area, but based on glazing ratio 30% to 35%. Need to clarify in such circumstances which criteria should be used.	Change proposed. The text has been amended to avoid a conflict between the guidance. The guidance now focusses on solar exposure rather than number of bedrooms but notes that schemes should seek to aim for the lower end of glazing ratios for 2 bed+ units.
9	35	London Borough of Brent	Figure 5.5 - The example with the cross ('X') seems to illustrate the requirement of retractable shading from the text below	Change proposed. The text has been amended to clarify that shading is not required in shaded locations and that in sunny locations, shading should be designed to be retractable.

10	18	Grand Union Alliance	For the avoidance of doubt on Principle 2: make clear that not only single aspect units should achieve the required factor/VSC by, for example, substituting a 'comma' for the first 'and' in the first line, i.e. that both single and multiple aspect units should achieve.	Change proposed. The text has been modified so that it is clear that not only single aspect units should achieve the required factor/VSC
11	56	London Borough of Brent	Appendix 4, Table 1 - Point 13 states: "To mitigate overheating whilst maintaining daylight and energy performance, prioritise single aspect 1-bed units with projecting balconies on South and South-East facades". This condones and promotes single-aspect flats against policy. This sentence should be removed.	Change proposed. The wording has been modified to highlight that this guidance only applies where single aspect dwellings are proposed.
12	43, 44 and 45	London Borough of Brent	Appendix 1 - The first two overheating questions should also apply to residential developments. The following question should be added: "Does the building layout avoid single-aspect dwellings and maximise cross-ventilation?"	Change proposed. These changes have been incorporated.
13	57 and 58	London Borough of Brent	Appendix 4, Table 1 -Under 'Key considerations', the following point should be added: "Adapt the building layout to avoid single-aspect dwellings and maximise cross-ventilation".	Change proposed. This has been added to the table.
14	11	London Borough of Hammersmith and Fulham	Section 2 - Outcomes are framed as "reductions" in costs, impacts, emissions etc. Therefore, the question arises, reductions relative to what criteria?	Change proposed. This is against a standard building regulation compliant building and this has been clarified.
15	32	London Borough of Brent	Figure 5.3 - Typo - heading states solar explore. Should be solar exposure.	Change proposed. This typo has been corrected.
16	15	London Borough of Hammersmith and Fulham	Para 4.1 - typo - "where standards doesn't exist" should be "don't exist"	Change proposed. This typo has been corrected.

17	N/A	London Borough of Hammersmith and Fulham	Section 2 - Vision Statement - Should this also include reference to achieving zero carbon emissions, or at least some reference to carbon emissions reduction requirements?	No change proposed. Although the guidance contained within the SPD will result in carbon reductions it is not the vision or purpose of the guidance which is targeted at enhancing the health and well-being of occupants.
18	N/A	London Borough of Hammersmith and Fulham	Section 2 - Objectives - as for the vision, there is no direct reference to carbon emissions reductions, requirement to meet zero carbon targets – should this be included?	No change proposed. Although the guidance contained within the SPD will result in carbon reductions it is not the vision or purpose of the guidance which is targeted at enhancing the health and well-being of occupants.
19	N/A	London Borough of Brent	We note earlier feedback on the need to promote dual aspect units has been partly addressed, and this is welcomed. An outstanding issue is that the SPD and supporting study is based on one particular type of point block tower development. It would be helpful to include examples of alternative tall building layouts. Perimeter blocks, incorporating deck / gallery access, are the standard way to achieve dual aspect dwellings (with opposing facades), and this could be better promoted in the SPD.	No change proposed. Although the guidance is particularly focussed on tall buildings where there are more pronounced issues with meeting daylight, sunlight and overheating standards, the guidance would be applied to all developments and that in any case, the guidance has been informed by other typologies as evidenced by Appendix 3. The guidance is informed by approximately 69,000 built form and design scenarios.
20	N/A	Canal and River Trust	The Trust has previously expressed concern about the impact of tall buildings along the Grand Union Canal on levels of daylight reaching the canal and its towpath. We believe that a canyon of tall buildings along the canal will make it a less attractive environment. We note, however, that it	No change proposed. Appropriate locations for tall buildings is not within the scope of this SPD. Planning policy relating to this matter is contained within the Local Plan.

			is not the OPDC's intention that the SPD considers the external environment.	
21	N/A	Grand Union Alliance	It almost goes without saying that the need for this SPD in part comes from the OPDC's choice of building typology; that is tall, super density and intense developments. The resulting consequence is that it is axiomatic and self-fulfilling that there are issues around access to light, energy and overheating that need to be resolved. A more moderate density/intensity, for example, may be an alternative approach to securing liveable places, homes and workspaces.	No change proposed. It is beyond the scope of this SPD to propose different densities. This was a consideration for the Local Plan and the examination. The SPD sets out how at high densities, good levels of daylight and sunlight can still be achieved and how overheating can be minimised.
22	N/A	Historic England	We encourage you to provide guidance in the SPD for external equipment such a brise soleils or mechanical ventilation extraction units. When making decisions about siting and design, consideration should be given to the implications for the public realm and historic environment as relevant.	No change proposed. It is beyond the scope of this SPD to provide design guidance for these features. Officers consider that there is sufficient policy guidance in OPDC's Development Plan (London Plan and Local Plan) to ensure a high quality design for these features.

23	N/A	London Borough of Brent	Appendix 4, Table 1 - Under 'Design responses...' point 10 states: "Single aspect 1-beds (inset balcony) can meet all targets with 50% glazing ratio". This does not meet London Plan policy D4 and should be removed.	No change proposed. London Plan Policy D4 does not make reference to single aspect units but London Plan Policy D6 states "Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating". The guidance is seeking to ensure that adequate daylight, ventilation and minimisation of overheating is being achieved and it therefore accords with London Plan requirements.
24	N/A	Grand Union Alliance	It is not only access to appropriate levels of daylight that has beneficial effects, but also to sun lighting throughout the year, when available. More attention should be paid to securing access to sun lighting.	No change proposed. OPDC considers it has appropriately dealt with this within buildings within the content of the SPD. The Local Plan addresses securing adequate sunlight in the public realm in policies D6 (Amenity), D8 (Play Space) and EU1 (Open space)

25	N/A	London Borough of Brent	Figure 5.7 - A very useful diagram but difficult to read. Larger font size needed.	No change proposed. The diagram text is taken from a different document and is as large as it can be.
26	N/A	London Borough of Hammersmith and Fulham	Para 1.9 States that the SPD will be applied to all development. We would welcome further clarity on whether this is all development or all major developments?	No change proposed. The guidance applies to all development, regardless of it being major or minor.
27	N/A	London Borough of Hammersmith and Fulham	Para 4.2 - What incentives are there for proposals to comply with the "Ambitions"?	No change proposed. The incentives are included in the outcomes section of the vision.
28	N/A	John Cox	<p>"The draft Passive Energy Performance, Daylight and Overheating in High Density Development SPD provides guidance to applicants on how best to achieve the environmental targets set out in OPDC's draft Local Plan and minimise carbon emissions."</p> <p>But it also has to be comprehensive to the public, in relation to the density - homes/hectare - that its Principles and Ambitions are likely to be compatible with.</p> <p>(Is this a proposed justification to be able to reach 600 homes/hectare at OOC?)</p>	No Change proposed. The purpose of the SPD is not to justify these densities but rather to ensure that if high density developments are proposed, developers are provided with guidance on how best to optimise daylight and sunlight and minimise overheating at densities comparable to that proposed with the Local Plan and that this guidance is then a material consideration in the determination of planning applications.

29	N/A	John Cox	<p>Furthermore, and maybe I have failed to study the documents in enough detail. but I would like to see how SENSITIVE the ... proposed parameters are (let me just name one example - Vertical Sky Component - but it applies to all of them)</p> <p>- versus - ... different densities.</p> <p>So for instance, I believe you say you can get 15% as Vertical Sky Density at 600 homes/hectare (h/h).</p> <p>You could vary either parameter:</p> <p>(a) Can I tell from your data, if you use 15%, would it also be achieved if it was 620 h/h, say?</p> <p>Or, varying the other parameter,</p> <p>(b) Can I tell, if you use 600 h/h, is it also so at 16%, say?</p> <p>For each particular parameter, I would want a 2-D graph of maximum likely density against parameter value.</p>	No Change proposed. The SPD does not identify a specific Vertical Sky Component (VSC) for specific densities. It identifies standards that need to be worked towards regardless of density and sets out design approaches and guidance for how they can be achieved.
30	N/A	Grand Union Alliance	<p>The present BRE guidance and Building Regulations etc. need to be exceeded or enhanced because of the failings in development when applied in isolation from one another and not dealt with in a holistic and integrated way at the early design stage of the development process.</p>	No Change proposed. The SPD is concerned with promoting the balancing of the highest standard of passive energy, daylight and managing overheating. Sometimes strict adherence to the BRE guidance and standards does not achieve this.

31	N/A	London Borough of Brent	The layout in Appendix 3 does include an element of genuine dual-aspect (part of the 'adjacent shoulder') and this typology should be highlighted and assessed.	No change proposed. This typology has been assessed and has informed the guidance
32	N/A	Grand Union Alliance	It is of concern that, for example, the Mayor's London Housing SPG (2016) states that standards of daylight and sunlight should not be applied rigidly. This is translated by decision-makers on planning applications to allow certain percentages of homes within developments not complying with, say BRE standards. It is crucial that the standards are not relaxed, and given our equalities concern, that the ambition to exceed minimum standards is diligently pursued.	Noted, the Housing SPG was produced by the GLA rather than by OPDC.
33	N/A	London Borough of Brent	The guidance in this SPD is useful to help to address the challenges tall buildings present in terms of energy use, daylight provision and overheating.	Noted.
34	N/A	London Borough of Hammersmith and Fulham	Section 3 - Table - Good idea to split the challenges down into residential and non-residential in the table	Noted.

35	N/A	Grand Union Alliance	The context and the justification for this SPD are briefly set out, but include important points, especially the relevance of health and well-being. Some more is written in the Supporting Study's Appendix G. More should have said on this, particularly as access to sunlight can have an equalities aspect. That is for the OPDC as a public authority in exercising its Public Sector Equality Duty and implementing the Equality Act 2010. Significant proportions of the population are Black and Ethnic Minority peoples who require higher levels of exposure to sunlight in order to maintain their health and well-being. Further investigation/research and consideration on this is required to ensure that the advocated standards sufficiently meet the needs of all Londoners	Noted. The guidance in the SPD seek to optimise the amount of daylight in a property while balancing this against potential increased risks of overheating.
36	N/A	London Borough of Hammersmith and Fulham	Section 4 Principles/Ambitions in relation to over-heating - Realise that over-heating is difficult to minimise, but I wonder if the Principle requirement is challenging enough and perhaps should be tougher, particularly in terms of the assessment (i.e. is use of 2020 files really adequate at this point)?	No change proposed. The principle accords with CIBSE TM 59 requirements, but the ambition sets a target for 2050 weather files to be used.
37	N/A	London Borough of Hammersmith and Fulham	Section 5 - Should the measures be clearly identified in terms of which ones are regarded as required to meet the "Principles" and which ones are only necessary if aiming to meet the "Ambitions"?	No Change proposed. All standards should be worked towards. However, the exact measures that should be adopted and the exact balance struck between passive energy, daylight and overheating will differ on a scheme by scheme basis.

38	37, 38, 39, 40, 41, 42 and 54	London Borough of Hammersmith and Fulham	Section 5 - Inconsistent use of G-value and g-value in this section	Change proposed. This has been amended so that it is consistently 'g-value'.
39	16	London Borough of Hammersmith and Fulham	Do the orange/yellow circles next to the sub-headings in this section mean anything?	Change proposed. A table has been added at paragraph 4.2 to explain what the colour coding represents.
40	26	London Borough of Hammersmith and Fulham	<p>Para 5.12 - Potential design solutions in areas that receive low levels of daylight include: Increasing the glazing area;</p> <ul style="list-style-type: none"> • using glass with high visible light transmittance; • using projecting balconies rather than inset balconies accept in area's of poor local air quality and high levels of noise; • using reflective surfaces on the outside of surrounding buildings whilst ensuring glare is appropriately addressed; and • increasing floor to ceiling heights 	Change proposed. This wording has been inserted.
41	N/A	London Borough of Hammersmith and Fulham	Para 5.26 - Applicants should consider from the outset whether it is possible to adjust the orientation of blocks and buildings to enhance daylight performance whilst reducing the risk of overheating and exposure to poor air quality and high levels of noise	No change proposed. Air quality and noise reduction measures are not the direct purpose of the SPD. Local Plan and London Plan policies appropriately deal with this matter.
42	N/A	London Borough of Hammersmith and Fulham	Para 5.28 - Where orientation is rotated by 45 degrees there is more scope to use inset balconies. Where possible developers should consider orientating their buildings to minimise the impact of overheating and exposure to poor air quality and high levels of noise. Figure 5.2 shows how orientation can change the design response.	No change proposed. Air quality and noise reduction measures are not the direct purpose of the SPD. Local Plan and London Plan policies appropriately deal with this matter.

43	36	London Borough of Hammersmith and Fulham	<p>Para 5.45 - Design solutions to address overheating include:</p> <ul style="list-style-type: none"> • Providing a sufficient area of openable windows and positioning windows to provide cross ventilation accept in area's of poor local air quality and high levels of noise ; • using thermal mass in carefully positioned areas to absorb heat coupled with night-time cooling; • specifying glazing to minimise direct solar gain; • balancing the area of glazing with the G-value (see figure 5.6) • Providing external shading. 	Change proposed. This wording has been inserted.
44	49	London Borough of Hammersmith and Fulham	<p>Appendix 2 - Relevant London Plan and Local Plan Policies</p> <p>This should include the following:</p> <p>Policy D8 Tall Buildings</p> <p>To ensure tall buildings are sustainably developed in appropriate locations, development plans must undertake the following:</p> <p>3) Environmental Impact a) Wind, daylight, sunlight penetration and temperature conditions, air quality and, noise conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the</p>	Change proposed. London Plan policies have been updated to the new London Plan policies. However this wording proposed is not covered within this policy line.

			<p>enjoyment of open spaces, including water spaces, around the buildings</p>	
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45	N/A	London Borough of Hammersmith and Fulham	<p>Appendix 2 - the policy below should also be included The policy below should also be included</p> <p>Local Plan Policy EU4 (Air Quality)</p> <p>i) designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution by avoiding creating street canyons, or building configurations that inhibit effective pollution dispersion. In particular, bus and taxi facilities should be designed to avoid the build-up of pollution;</p> <p>j) minimising emissions from any combustion based sources of energy that are deployed by ensuring low emission plant is used and where appropriate suitable after treatment technologies are adopted; and</p> <p>k) designing and positioning any energy facilities within the development area to minimise harmful emissions and maximise the rapid dispersion of any residual pollutants to minimise impact..</p>	No change proposed. The air quality policy is not considered directly relevant to the scope and guidance contained in the SPD. There are Local Plan and London Plan policies which seek to ensure an appropriate approach is take towards improving air quality and ensuring development is mitigated against its impacts.
46	55 and 59	London Borough of Hammersmith and Fulham	Appendix 4 - The tables provide examples of options available to achieve the SPD Principles, but there are no equivalent tables to show what could be done to achieve the Ambitions. This reduces the likelihood of these higher level standards being achieved, so can this information be provided?	Change proposed. The table is also relevant to the ambitions so the table title has been amended to reflect this.