

# Appendix I

## Regulation 19(2) Summary of Main Issues Raised and Officer Response

Main Issue	Respondents	OPDC's proposed response
<p><b>Affordable Housing tenure split.</b> Tenure split should give greater priority to need for Social Rent/London Affordable Rent;</p> <ul style="list-style-type: none"> <li>• <b>GLA</b> requested that OPDC should consider how its policy could better reflect presumption that the 40 per cent to be decided by the borough should focus on Social Rent/London Affordable Rent;</li> <li>• <b>LBB and LBHF</b> requested that the tenure split be amended to 60% Social Rent/LAR, 40% intermediate; and</li> <li>• <b>LBE</b> requested that the priority should always be to secure genuinely affordable housing based on local need.</li> </ul>	GLA, LB Brent, LB Ealing, LB Hammersmith and Fulham	<p>Change proposed.</p> <ul style="list-style-type: none"> <li>• OPDC's Affordable Housing Viability Assessment (AHVA) tested a number of development scenarios and affordable housing levels, including an overall target to deliver 35% and 50% affordable housing with a tenure split in each of 30%, 43% and 70% Social Rent/London Affordable Rent (LAR) housing, with the remainder provided as intermediate housing.</li> <li>• This showed that based on current existing use values, likely current/future (non-grown) sales values, construction costs and other costs, only a tenure split of 30% social rent/LAR and 70% intermediate would be viable if OPDC sought to achieve an overall affordable housing target of 50%.</li> <li>• OPDC cannot set a policy that does not take account of viability – this would risk the Local Plan being found unsound.</li> <li>• OPDC has however sought to make changes to the policy and supporting text to identify the 30% social rent/LAR target as a minimum target by seeking to optimise social rent/LAR through review mechanisms, public grant and seeking to exceed the 30% social rent/LAR target on schemes that do not meet the Mayor's threshold approach to viability.</li> <li>• Supporting text has also been added to the policy identifying that OPDC will revisit Policy H2 and its associated viability evidence at the earliest opportunity to ensure that any increased development value can maximise the delivery of social rent/London Affordable Rent homes.</li> </ul>
<p><b>Additional site allocations / removal of SIL designation within Park Royal requested:</b></p> <ul style="list-style-type: none"> <li>• 247 Acton Lane – request for a new site allocation</li> <li>• Land at Abbey Road – request for a new site</li> </ul>	Private landowners, Royal Borough of Kensington and Chelsea	<p>No change proposed.</p> <ul style="list-style-type: none"> <li>• Further release of SIL is not considered appropriate as this would undermine the functioning of Park Royal as London's largest and most successful industrial location.</li> <li>• 247 Acton Lane does not meet the capacity thresholds for site allocations (100 homes in first ten years, 1,000 homes in 11-20 years and/or over 10,000 sqm of</li> </ul>

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<p>allocation and removal from Strategic Industrial Location (SIL)</p> <ul style="list-style-type: none"> <li>Western Road – request for removal from SIL for delivery of a car pound from RBKC</li> <li>A40 Data Centre – request for removal from SIL</li> </ul>		<p>non-residential floorspace over plan period) and is therefore not appropriate for designation.</p> <ul style="list-style-type: none"> <li>Land at Abbey Road is not considered to be deliverable/developable within the Local Plan period and is therefore not identified as a Site Allocation. Further details are provided within the Land at Abbey Road Development Options Appraisal Report, which is a supporting study to OPDC's Local Plan.</li> <li>In relation to RBKC's request, a car pound would be an appropriate use for SIL.</li> </ul>
<p><b>Adoption of streets.</b> The Local Plan should be clearer that new streets should be offered to the local authorities for adoption.</p>	LB Hammersmith and Fulham	<p>Change proposed.</p> <ul style="list-style-type: none"> <li>The Local Plan has been amended to require that streets are offered to local highways authorities for adoption.</li> <li>Outside of the Local Plan process, OPDC and LBHF officers are exploring a joint adoption strategy.</li> </ul>
<p><b>Alternative development options should be considered</b> in the Integrated Impact Assessment</p>	Local community groups and neighbourhood forums	<p>No change proposed.</p> <ul style="list-style-type: none"> <li>Government guidance advises that only reasonable alternatives to proposals, that are realistic and deliverable, should be considered.</li> <li>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.</li> <li>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.</li> <li>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 capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan.</li> <li>OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable. Therefore, the approach taken in the Local Plan continues to be considered as the most appropriate strategy for the OPDC area.</li> </ul>

Main Issue	Respondents	OPDC's proposed response
<p><b>Consultation process has been unfair, unreasonable and ineffective</b> due to the extent of changes to the 1<sup>st</sup> Regulation 19 Local Plan.</p>	Local community group	<p>No change proposed.</p> <ul style="list-style-type: none"> <li>A second Regulation 19 consultation was considered appropriate to enable stakeholders to comment on changes to the Local Plan. Changes to the Local Plan were made in response to comments to the first Regulation 19, recommendations from new and updated supporting studies, requirements of the Draft New London Plan and changes to national and regional policy and infrastructure priorities.</li> <li>An annotated tracked change version of the Local Plan was published which sets out amendments and reasoning for amendments to assist in identifying changes to the Local Plan to help inform comments. OPDC carried out a pre-consultation event and 4 consultation events to help define the key areas of change.</li> <li>OPDC carried out a proactive consultation exercise as part of the public consultation on the Second Regulation 19 Local Plan.</li> <li>The document was consulted on for 6 weeks in accordance with Local Planning Regulations and OPDC's Statement of Community Involvement. OPDC hosted 4x2 hour presentation sessions, consisting of a presentation and question and answer session.</li> <li>Prior to the formal commencement of consultation, OPDC also hosted a pre-consultation event, to provide community groups with an overview of the results and key changes resulting from the first Regulation 19 consultation and to inform stakeholders of the content of the Second Regulation 19 Local Plan and how stakeholders should respond to the consultation.</li> <li>During the consultation, emails to OPDC were responded to as soon as was practicable.</li> <li>Further details on OPDC's engagement activities in respect of the Local Plan can be found in the Statement of Consultation document.</li> </ul>
<p><b>Development at Willesden Junction Station.</b> Willesden Junction Station and adjacent areas should be included in earlier phases of development to enable better connections to Harlesden.</p>	LB Brent	<p>Change proposed.</p> <ul style="list-style-type: none"> <li>The phasing of development is defined in OPDC's Development Capacity Study (DCS) and does not preclude the delivery of new connections between Harlesden, Willesden Junction Station and Old Oak North.</li> <li>The DCS has been developed in accordance with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. This considers deliverability and developability of sites to inform phasing. Based on current information, potential development over and adjacent to the station is challenging due to the inter-related complexities created by railway infrastructure,</li> </ul>

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		<p>restricted accessibility and complex land ownerships. These issues are considered to impact on the developability of development above and adjacent to the station resulting in development to currently be envisaged outside of the plan period.</p> <ul style="list-style-type: none"> <li>• However, OPDC has established the Willesden Junction Steering Group involving key stakeholders, including the London Borough of Brent, and has commissioned additional work to identify development feasibility and potential capacity.</li> <li>• Policy P11 explicitly supports the earlier delivery of new homes and jobs within the plan period by optimising development on and/or adjacent to the station and tracks. Policies SP10 and DI2 also support the timely delivery of development, potentially in advance of identified phasing.</li> <li>• In light of the areas potential longer term development capacity, the area to the west of Willesden Junction Station will be shaded to represent development capacity beyond the plan period.</li> </ul>
<p><b>Development capacity, phasing and densities.</b> Densities are above the existing London Plan density matrix, should be reduced and won't deliver a high quality environment. Densities have increased during the development of the Local Plan. Changes in development capacity aren't justified. Updates to development phasing have not considered impact on viability of delivering infrastructure. Further site specific density information should be provided. Debates at OPDC Planning Committee and OPDC Board have not considered density as an issue.</p>	<p>Local community groups, neighbourhood forums, residents</p>	<p>No change proposed.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• This approach has been approved by OPDC Planning Committee and Board and is supported by policies in the London Plan. High density development is also 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. These targets have been subject to their own examination through the London Plan development process.</li> <li>• Opportunity Areas are London's main reservoirs for growth. As such, the current London Plan 2016 (Policy 2.13) and the Draft New London Plan (Policy SD1) supports development in these areas that potentially exceeds defined targets, by optimising development densities. The Mayor of London's Housing SPG (2016) paragraphs 7.5.7 and 7.5.8 state 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).</li> <li>• The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities. The density range set out in the Local Plan remains unchanged from the Regulation 18 draft Local Plan.</li> </ul>

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		<ul style="list-style-type: none"> <li>• The Local Plan provides series of policies to ensure that high density typologies, required to optimise development capacity to meet targets, are of the highest design quality to support sustainable communities and appropriately address issues such as, inter alia, context and townscape (SP9), access, inclusivity and Healthy Streets (D2), amenity (D6), provision of 30% publicly accessible open space (EU1), air quality (EU4), high quality social infrastructure provision (TCC4) and noise and vibration (EU5). These policies will be supplemented by forthcoming supplementary planning documents.</li> <li>• OPDC's Development Capacity Study has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments to demonstrate how the London plan targets can be delivered. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal 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.</li> <li>• Explanations for the changes in development capacity are set out in OPDC's Development Capacity Study in accordance with the National Planning Proactive Guidance for Housing and Economic Land Availability Assessments. A summary of these changes was provided within the Development Capacity Study and Summary of Supporting Studies document.</li> <li>• Updates in phasing of development have been used to inform OPDC's Infrastructure Delivery Plan. 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 is not the role of the Local Plan to develop a clear cashflow funding model for all infrastructure delivery. As identified in Policy DI1, there will be a need for a variety of funding sources to deliver infrastructure. The Local Plan is supported by a Whole Plan Viability Study and Affordable Housing Viability Assessment which assesses the deliverability of its policy requirements including infrastructure. OPDC's Infrastructure Delivery Plan supporting study sets out the infrastructure required to meet the needs of development and potential funding sources for each.</li> <li>• Providing densities for each site allocation is not considered to be required to fulfil the role of a Local Plan as a strategic planning document. OPDC considers</li> </ul>

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		policies SP9 and D5 are consistent with the requirements of NPPF regarding clarity of Local Plans.
<b>Gypsy and traveller accommodation.</b> Additional land should be allocated to meet outstanding need for gypsies and travellers from RBKC.	Royal Borough of Kensington and Chelsea	<p>No change proposed.</p> <ul style="list-style-type: none"> <li>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).</li> <li>OPDC has undertaken an assessment of sites that could potentially meet the needs of other local authorities such as RBKC. This has shown that there are no sites within the OPDC area that would be suitable for designation for additional gypsy and traveller pitches as they are either designated as Strategic Industrial Location (SIL), Opportunity Area or Metropolitan Open Land/ open space.</li> </ul>
<b>Opposition to the continued safeguarding of Old Oak Sidings (Powerday).</b> Continued safeguarding will have a negative impact on local amenity.	Local community groups and residents	<p>No change proposed.</p> <ul style="list-style-type: none"> <li>The Mayor's London Plan requires Local Plans to identify land/facilities to meet waste apportionment targets, and expects this to include protecting and facilitating the maximum use of existing waste sites.</li> <li>OPDC's Waste Apportionment Study shows that the Old Oak Sidings (Powerday site) is required to be safeguarded to meet LBHF's waste apportionment target and therefore it will continue to be protected as a waste management site.</li> <li>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.</li> <li>A range of policies within the Local Plan and London Plan will be implemented to ensure that new development would not cause unacceptable harm to the amenity of existing uses. These Local Plan policies include SP9, D6, EU4, EU5, EU6, P2 and P8.</li> </ul>
<b>Safeguarding of Elizabeth Line Spur.</b> The Local Plan should continue to safeguard the spur connecting the Elizabeth Line to services along the West Coast Main Line (WCML).	LB Brent	<p>No change proposed.</p> <ul style="list-style-type: none"> <li>The Department for Transport and TfL have formally withdrawn support for this proposal. Exploration of delivering the Chiltern Line to Old Oak Common Station is underway. the delivery of this would prohibit the delivery of the WCML spur.</li> </ul>
<b>Social Infrastructure Needs Study.</b> The study methodology is questioned in relation to:	LB Brent	No change proposed.

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<ul style="list-style-type: none"> <li>the assumption for school nursery places take-up and the subsequent split between public and private nurseries; and</li> <li>surplus capacity in existing schools and potential pressure on places.</li> </ul>		<ul style="list-style-type: none"> <li>LBB were part of the Social Infrastructure Needs Study (SINS) working group and agreed the methodology.</li> <li>When contacted as part of the development of the SINS, LB Brent noted that they were not in a position to provide a figure for the take up of school nursery places given the variances across the Borough. At that point in time, no suggestion that 50% would be an appropriate figure was provided. It was agreed that the assumption be based on the figure provided by the London Borough of Ealing which indicated a 76% take up of school nursery places within that Borough. Where LB Brent provided advice on assumptions, this was incorporated within the study.</li> <li>Schools with potential for off-site expansion were identified by the London Borough of Hammersmith and Fulham, as evidenced through their Schools Expansion Study. The SINS gave full consideration to accessibility issues, and a number of potential options for off-site expansion were discarded on this basis. As LB Brent were not in a position to confirm suitable candidates for off-site school expansion, no assumption was made for any potential off-site expansion options in Brent. The issue of additional pressure on schools towards LB Brent's southern border is a catchment area issue, and it is for each school to establish their own catchment area.</li> </ul>
<b>Sport facilities evidence base.</b> Sport England do not agree with the approach to delivering sport centre provision, consider the evidence to be out of date and was only for LB Hammersmith and Fulham. A dedicated OPDC evidence base is required.	Sport England	No change proposed. <ul style="list-style-type: none"> <li>OPDC considers the approach to delivering sports infrastructure to be robust, based on evidence and effective for securing contributions from developers.</li> <li>The Sports Courts and Swimming Pools Study is based on current population projections, which haven't changed significantly since the study was published. Although the study was produced for Hammersmith and Fulham, it considered the need of a significantly wider catchment area, including the boroughs of Brent and Ealing and the OPDC area. It should also be noted that the vast majority of new homes in the OPDC are being delivered within the boundaries of Hammersmith and Fulham. As such, OPDC consider the study is an appropriate measure of need for sports and leisure provision within the OPDC area.</li> <li>Based on this study, OPDC has identified the need for development to contribute to two public access sports facilities, providing 25m pools and a range of sports courts.</li> </ul>
<b>Sustainable Drainage Systems (SuDS).</b> The Local Plan should prioritise strategic SuDS and set	Environment Agency, Thames Water, LBHF	No change proposed.

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out clearer rate flow guidance for attenuation measures.		<ul style="list-style-type: none"> <li>As out set out in Policy EU3, strategic SuDS incorporated into streets, open spaces and other areas of public realm will form part of OPDC's approach to managing surface water run-off. The London Plan requires water to be treated as close to source as possible, so on-plot solutions are prioritised before strategic SuDS are considered.</li> <li>OPDC considers rate flow guidance to be too detailed a matter to state in the Local Plan. The requirement to achieve greenfield run-off rates for a 1-100 + 40% climate change event are clearly stipulated in the policy.</li> </ul>
<b>Tall buildings definition and locations.</b> Methodology for defining tall buildings and locations where tall buildings are "an appropriate form of development in principle" is questioned. General tall building heights should be identified. Particular concern regarding location of tall buildings along Scrubs Lane and impact on heritage assets. The Local plan lacks clear information for building heights.	Local community groups, neighbourhood forums, residents, LBB, RBKC, Historic England	<p>No change proposed.</p> <ul style="list-style-type: none"> <li>The methodology for defining a tall building and identifying appropriate locations within the OPDC area are set out in OPDC's Tall Building Statement. This meets the requirements of Draft New London Plan Policy D8 and paragraph 3.82 in relation to the evolving context of Opportunity Areas.</li> <li>General tall building heights are not considered to be appropriate to be defined at this time. This is due to the evolving context of the OPDC area as an Opportunity Area and recognising the area-specific complex circumstances in planning and delivering priorities for affordable housing, commercial uses, local and nationally significant infrastructure, new street networks, high standards of sustainability, securing deliverability of development and addressing multifaceted challenges.</li> <li>The Mayor of London has not raised this as an issue in his representations on the Local Plan. A range of London Plan, Local Plan and material considerations will be implemented to determine the appropriateness of any tall building proposals.</li> <li>In relation to the appropriateness of four tall buildings along Scrubs Lane, the principle for their appropriateness has been determined through the Scrubs Lane Development Framework Principles document which was supported by a Strategic Views Assessment considering impacts on surrounding heritage assets.</li> <li>The definition of a tall building within the OPDC area is set out in Policies SP9, D5 and the Glossary. An indicative map depicting locations where tall buildings would be an appropriate form of development in principle has been included to support Policy SP9. Ranges of appropriate building heights have been identified in place policies where these are supported by evidence base.</li> <li>As future supporting studies are developed, further guidance in future versions of the Local Plan and/or supplementary planning documents will be provided.</li> </ul>



## Appendix J

### List of all Issues Raised and Officer Responses at Regulation 19 2<sup>st</sup> Stage

#### Issues raised by representations on the Regulation 19(2) second revised draft Local Plan and how they have been dealt with

The below provides an overview of the issues raised on the Regulation 19(2) 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(2) 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 2<sup>nd</sup> 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(2) 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.

## General 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
2/G1	General	Support for comprehensive and coordinated redevelopment of Old Oak with good links with Imperial White City Campus.	1	Imperial College	Noted.
2/G2	General	Local Plan is sound, legally compliant and has met the Duty to Cooperate requirements. Imperial College's responses seek to correct errors.	1	Imperial College	Noted.
2/G3	General	The Council welcome changes made to the Local Plan but continue to object to a number of policies which aren't sound.	1	London Borough of Brent	Noted.
2/G4	General	Wish to engage positively to address issues	1	London Borough of Brent	Noted.
2/G5	General	Support close working with OPDC, content of Local Plan and welcome opportunity to meet to discuss outstanding issues.	1	Transport for London Commercial Development	Noted.
2/G6	General	Overview of role of TfL as strategic transport authority	1	Transport for London	Noted.
2/G7	General	Welcome previous comments have been addressed. New comments reflect strategic transport policies in the existing London Plan, Draft New London Plan and the Mayor's Transport Strategy	1	Transport for 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
2/G8	General	New London Overground Stations at Hythe Road and Old Oak Common Lane should be consistently referenced as potential new stations in text and images.	1	Transport for London	Change proposed. All text and image references will be referred to as potential stations. To ensure images remain
2/G9	General	Support for references to Good Growth and Healthy Streets.	1	Transport for London	Noted.
2/G10	General	Support Place Policies and Delivery and Implementation policies to be Strategic Policies.	1	Transport for London	Noted.
2/G11	General	Support for removal of repetition and delivery of a clearer Local Plan.	1	London Borough of Ealing	Noted.
2/G12	General	Welcome some amendments to the document but continue to consider Local Plan does not adequately refer to sports provision. Sport related evidence base is not adequate. Previous comments still stand.	1	Sport England	Noted. Please refer to responses to specific comments.
2/G13	General	Add A Definition of Metropolitan Park and Metropolitan SINC in the Glossary	1	Wormwood Scrubs Charitable Trust	Change proposed. The glossary will be amended to include London Plan definition of Metropolitan Parks. The definition of Sites of Metropolitan Importance within the glossary will be amended.
2/G14	General	Support for emerging policies and changes made to previous Local Plan.	1	NHS London Healthy Urban Development Unit	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
2/G15	General	Consider Local Plan to be sound and welcome opportunity to discuss any comments.	1	Environment Agency	Noted.
2/G16	General	LBHF seeks an ambitious and bold regeneration of the OPDC area, in particular to maximise the benefits and opportunities to improve the quality of life of existing borough residents as well as future residents and businesses. Building thousands of genuinely affordable homes, start-up business space and regeneration of the highest 'green' standards must be an integral part of providing an integrated transport infrastructure and hub of international status.	1	London Borough of Hammersmith and Fulham	Noted. The Local Plan seeks to help to achieve these aspirations.
2/G17	General	Welcome close working with OPDC.	1	London Borough of Hammersmith and Fulham	Noted.
2/G18	General	LBHF remains the Local Authority for the OPDC area and is responsible for a number of statutory services. LBHF seeks to ensure involvement to all funding and delivery mechanisms to inform delivery of services.	1	London Borough of Hammersmith and Fulham	Noted. Policy DI1 makes reference to the need to work with boroughs support delivery of services. A working group is being established with the boroughs to inform expenditure of planning contributions.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/G19	General	LBHF designations should be shown on OPDC's Policies Map.	1	London Borough of Hammersmith and Fulham	Noted. All relevant LBHF information OPDC has inherited from LBHF is shown on the Policies Map. This includes heritage and biodiversity designations.
2/G20	General	Generally supportive of many elements of the Local Plan. Some previous comments have been addressed while some still remain. Identify policies not considered to be sound. Note that all previous comments will be submitted. Wish to attend examination.	1	London Borough of Hammersmith and Fulham	Noted.
2/G21	General	Support for the Local Plan but some concerns regarding links.	1		Noted. Please refer to responses to specific comments.
2/G22	General	Overview of TITRA and TITRA area	4	TITRA, James Trew, Eileen Hannington, Rachel Ritfield	Noted.
2/G23	General	Insufficient consultation has been carried out.	1	Janice Gayle-Farlow	No change proposed. OPDC's Statement of Consultation sets out how consultation on the Local Plan has been carried out to meet and exceed statutory requirements and requirements of OPDC's Statement of Community Involvement. The various changes made to the Local Plan drafts in response to residents and community groups' comments are set out in the Statement of Consultation.

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2/G24	General	Wish to be notified of the Examination in Public and make oral representations.	1	Old Oak Neighbourhood Forum	Noted.
2/G25	General	<p>OPDC Board designated a smaller Old Oak Neighbourhood Area than originally submitted. Old Oak Neighbourhood Forum was subsequently designated by OPDC. The Forum continues to believe that an opportunity has been missed to exploit the potential of the neighbourhood planning framework in creating a successful new part of London at Old Oak. Draft Local Plan has changed significantly during its development. The second Regulation 19 Local Plan is considered to have fundamental problems.</p> <p>The forum considers that parts of the OPDC Local Plan will need to be refreshed soon after adoption in light of changing circumstances. The Forum continues to consider a neighbourhood plan for the original larger Old Oak Neighbourhood Area would benefit the area as it would be locally specific and would potentially be the most able policy approach to respond quickly to changing circumstances. Currently this is not able to be progressed. Place policies are too detailed which prevents production of neighbourhood plan policies.</p>	1	Old Oak Neighbourhood Forum	<p>No change proposed. Policy DI3 sets out OPDC's commitment to supporting Neighbourhood Forums in the development of Neighbourhood Plans. The commitment to proactive engagement is also set out in OPDC's Statement of Community Involvement. OPDC will continue to support the Old Oak Neighbourhood Forum in the development of their neighbourhood plan for their neighbourhood area. The designation of the Old Oak Neighbourhood Area (September 2017) and Forum (February 2018) was undertaken in accordance with the relevant neighbourhood planning legislation, national Planning Practice Guidance and informed by the Court of Appeal in the case of Daws Hill Neighbourhood Forum v Wycombe District Council (2014). The decision information is available to view on OPDC's Neighbourhood Planning webpages.</p> <p>No change proposed. OPDC will review the need to revise part or all of the Local Plan annually. This process will be published in OPDC's Authority Monitoring Report. NPPG on Neighbourhood Plans sets out that Neighbourhood Plan policies</p>

Comment reference	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>have a role in providing policies to address non-strategic matters and are required to be in general conformity with the strategic policies of the development plan. Therefore, a neighbourhood plan would not be able to set out policies to address strategic matters which are critical to the delivery of the Local Plan's spatial vision.</p> <p>Para 184 of the NPPF (2012) states that local planning authorities should set out clearly their strategic policies for the area. NPPG Paragraph: 076 Reference ID: 41-076-20140306 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. The Local Plan states that the Strategic Policies chapter, the Place Policies Chapter and the Delivery and Implementation Chapter are strategic policies. The Place Policies set out the overarching direction and objectives for each place, deal with strategic matters such as how many homes and jobs must be delivered in each place, support site allocations which are important to delivering the spatial vision and homes and jobs targets, and set out the important infrastructure required to</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					support the sustainable regeneration of that place and of the wider plan.
2/G26	General	Comments apply to significant changes to the Plan and where change has been anticipated but not made. Previous comments continue to still apply.	1	The Friends of Wormwood Scrubs	Noted.
2/G27	General	Previous comments still stand.	1	The Hammersmith Society	Noted.
2/G28	General	Note that references to the Mayor's Blue Ribbon Network have been replaced by references to the Mayor's All London Green Grid.	1	The Inland Waterways Association	Noted. This is to ensure consistency with the Draft New London Plan.
2/G29	General	Local Plan Foreword does not set out what evidence base has been updated.	1	West Twyford Residents Association	No change proposed. This information is set out in the Summary of Supporting Studies document.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/G30	General	Local Plan Foreword does not make reference to the Master Plan or set out how development is progressing.	1	West Twyford Residents Association	No change proposed. The Old Oak North Development Framework Principles identifies that its contents draws from the outputs of the Old Oak Masterplan. Figure 3.16 sets out the phasing of development for the OPDC area. This is based on the most up to date development information at the time of writing which is set out in OPDC's Development Capacity Study.
2/G31	General	Supporting studies have not been produced in collaboration with stakeholders or community members or consulted on.	1	Grand Union Alliance	No change proposed. Where appropriate the development of supporting studies involved engagement with stakeholders. The Second Regulation 19 Consultation provided the opportunity for stakeholders to comment on all supporting studies. A number of comments have resulted in changes to studies.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/G32	General	HS2 development creates uncertainty for commercial development in the area.	1	Grand Union Alliance	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 contributions. The Whole Plan Viability Study has tested the cumulative impact of the policies in the Local Plan including the development adjacent to Old Oak Common Station. This identifies that development is viable.
2/G33	General	<p>Consultation process has been unfair, unreasonable and ineffective due to the extent of changes to the first Regulation 19 Local Plan.</p> <p>The Inspector should also consider addition issues not submitted as part of the second Regulation 19 consultation</p>	1	Grand Union Alliance	No change proposed. A second Regulation 19 consultation was considered appropriate to enable stakeholders to comment on changes to the Local Plan. Changes to the Local Plan were made in response to comments to the first Regulation 19, recommendations from new and updated supporting studies, requirements of the Draft New London Plan and changes to national and regional policy and infrastructure priorities. An annotated tracked change version of the Local Plan was published which sets out amendments and reasoning for amendments to assist in identifying changes to the Local Plan to help inform comments. OPDC carried out a pre-consultation event and 4 consultation events to help define the key areas 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
					<p>change.</p> <p>No change proposed. OPDC carried out a proactive consultation exercise as part of the public consultation on the Second Regulation 19 Local Plan. The document was consulted on for 6 weeks in accordance with Local Planning Regulations and OPDC's Statement of Community Involvement. OPDC hosted 4x2 hour presentation sessions, consisting of a presentation and question and answer session. Prior to the formal commencement of consultation, OPDC also hosted a pre-consultation event, to provide community groups with an overview of the results and key changes resulting from the first Regulation 19 consultation and to inform stakeholders of the content of the Second Regulation 19 Local Plan and how stakeholders should respond to the consultation. During the consultation, emails to OPDC were responded to as soon as was practicable. Further details on OPDC's engagement activities in respect of the Local Plan can be found in the Statement of Consultation document.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/G34	General	<p>Change in development capacity is not justified.</p> <p>Targets are arbitrary and does not demonstrate how infrastructure will be funded. Impacts on development viability due to change in phasing have not been considered, including loss of CIL and S106 revenue. This will result in poor planning outcomes.</p> <p>Infrastructure requirements in the DIFS have not been updated.</p>	1	Grand Union Alliance	<p>No change proposed. Explanations for the changes in development capacity are set out in OPDC's Development Capacity Study in accordance with the National Planning Proactive Guidance for Housing and Economic Land Availability Assessments. A summary of these changes was provided within the Development Capacity Study and Summary of Supporting Studies document. This includes the outputs of the Old Oak North Development Framework Principles.</p> <p>No change proposed. OPDC's development capacity targets are informed by the Opportunity Area targets set out in the London Plan. These have been subject to their own examination through the London Plan development process. 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</p>

Comment reference	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>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. The current London Plan and Draft New London Plan continue to include these targets.</p> <p>No change proposed. Updates in phasing of development have been used to inform OPDC's Infrastructure Delivery Plan. 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 is not the role of the Local Plan to develop a clear cashflow funding model for all infrastructure delivery. As identified in Policy DI1, there will be a need for a variety of funding sources to deliver infrastructure.</p> <p>No change proposed. The Local Plan is supported by a Whole Plan Viability Study and Affordable Housing Viability Assessment which assesses the deliverability of its policy requirements</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					including infrastructure. OPDC's Infrastructure Delivery Plan supporting study sets out the infrastructure required to meet the needs of development and potential funding sources for each.
2/G35	General	<p>The plan is unsound as it is ineffective and contradictory between policies in the plan and with GLA and NPPF guidance.</p> <p>Changes made to the plan represent efforts to undermine delivering sustainable and social infrastructure.</p>	1	Grand Union Alliance	<p>No change proposed. The Local Plan is in general conformity with the London Plan and is considered to be consistent with the NPPF. General conformity enables the Local Plan to differ from the London Plan if the approach is sound and evidence based. The policy content of the Local Plan has been developed to deliver the Spatial Vision and Vision narratives and is internally consistent. The content strikes an appropriate balance between being aspirational and visionary, but also being deliverable, as required by the NPPF.</p> <p>No change proposed. The Local Plan provides a series of policies to deliver green and social infrastructure including policies SP2, SP3, SP4, SP8, EU1, EU2, TCC4 and DI1.</p>
2/G36	General	Local Planning is important to influence top down planning across London.	1	Grand Union Alliance	Noted. The NPPF guidance for delivering a plan-led approach have been used to inform the development of 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
2/G37	General	<p>Local issues must be addressed through the Local Plan.</p> <p>Current approach will not address these issues and is unrealistic.</p>	1	Grand Union Alliance	<p>Noted. The Integrated Impact Assessment and Social Economic Baseline defines local issues. These have been used to inform policies within the Local Plan.</p> <p>No change proposed. OPDC considers the approach set out in the Local Plan will successfully deliver the Spatial Vision and Vision narratives.</p>
2/G38	General	The OPDC area and surrounding neighbourhoods need to be surveyed to determine existing conditions. This should underpin the development plan which a foal to "improve the opportunities, amenities, and health of the entire area, and of its inhabitants".	1	Grand Union Alliance	<p>Noted. The Integrated Impact Assessment and Social Economic Baseline defines local issues. These have been used to inform policies within the Local Plan.</p> <p>Noted. These aspirations are central to the Spatial Vision and Vision narratives.</p>
2/G39	General	Overview of residential area, potential impacts of development and support for Grand Union Alliance and Old Oak Neighbourhood Forum responses.	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	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
2/G40	General	A second Regulation 19 Local Plan consultation is unusual. Changes made to the Local Plan are substantial. Basic issues were insufficiently considered in earlier versions of the Local Plan. Original timetable has been delayed by 2 years.	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	Noted. A second Regulation 19 consultation was considered appropriate to enable stakeholders to comment on changes to the Local Plan. Changes to the Local Plan were made in response to comments to the first Regulation 19, recommendations from new and updated supporting studies, requirements of the Draft New London Plan and changes to national and regional policy and infrastructure priorities. An annotated tracked change version of the Local Plan was published which sets out amendments and reasoning for amendments to assist in identifying changes to the Local Plan to help inform comments. OPDC carried out a pre-consultation event and 4 consultation events to help define the key areas of change. OPDC's Local Development Scheme has been updated and published reflecting the change in timetable.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/G41	General	<p>Support development of a new part of London but not in the way that OPDC is proposing.</p> <p>No reasonable alternatives to the OAPF and Regulation 18 Local Plan have been identified.</p>	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	<p>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 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."</p> <p>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</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					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 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. Therefore the approach taken in the Local Plan continues to be considered as the most appropriate strategy for the OPDC area.
2/G42	General	Place policies are not strategic policies and do not meet the relevant criteria. Further justification is required to inform any future neighbourhood plan development. This limits the scope of neighbourhood plans and is contrary to the NPPF. NPPF 2018 states strategic policies should address strategic priorities of the area to provide space for neighbourhood plan policies.	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	No change proposed. Policy DI3 sets out OPDC's commitment to supporting Neighbourhood Forums in the development of Neighbourhood Plans. The commitment to proactive engagement is also set out in OPDC's Statement of Community Involvement. OPDC will continue to support the Old Oak Neighbourhood Forum in the development of their neighbourhood plan for their neighbourhood area. Para 184 of the NPPF (2012) states that local planning authorities should set out clearly their strategic policies for the area. NPPG Paragraph: 076 Reference ID: 41-076-

Comment reference	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>20140306 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. The Local Plan states that the Strategic Policies chapter, the Place Policies Chapter and the Delivery and Implementation Chapter are strategic policies. The Place Policies set out the overarching direction and objectives for each place, deal with strategic matters such as how many homes and jobs must be delivered in each place, support site allocations which are important to delivering the spatial vision and homes and jobs targets, and set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/G43	General	Local Plan provides limited reference to neighbourhood planning. Existing neighbourhood forums and areas should be referenced.	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	Change proposed. The role of neighbourhood planning is recognised within the Local Plan in the introduction, policies SP6 (regarding Place Polices), DI3 and DI4. The supporting text to DI3 will be updated to include reference to the Old Oak and Harlesden neighbourhood areas and forums. OPDC's website provides information regarding the designation process of both forums and maps of both areas.
2/G44	General	Confirmation that previous consultation comments made for the first Regulation 19 consultation have not been repeated. Overview of the tests of soundness	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	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
2/G45	General	<p>If the Local Plan is found to be unsound Old Oak and Park Royal cannot be left without a planning framework. OPDC could focus more on being a developer and delegate planning decisions to LBHF. LBHF adopted their Local Plan in February 2018 but did not include specific guidance for the OPDC area.</p> <p>OPDC Local Plan should be revised. During this time LBHF should be allowed to prepare development management policies for the OPDC area within a 10 year meanwhile Local Plan until transport infrastructure is delivered. This would deliver a range of benefits to integrate communities and respond to local property markets. It could:</p> <ul style="list-style-type: none"> <li>- identify sites for temporary self-build and custom-build housing to accommodate construction workforce and provide affordable homes;</li> <li>- take a flexible approach to releasing SIL along the LBHF and Ealing boundary.</li> </ul>	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	No change proposed. In accordance with the NPPF, as a Local Planning Authority, OPDC is required to develop a Local Plan for its area. OPDC considers the Local Plan to be sound and the most appropriate strategy for the OPDC area and has worked closely with LBHF during its development to ensure it delivers the council's aspirations and duties for the Old Oak area. Any amendments to the Local Plan after submission, and the approach to carrying out these amendments, will be determined by the independent Planning Inspector.
2/G46	General	<p>Previous support for joint working arrangement between three boroughs. Consider that the LBHF Local Plan would deliver a realistic approach. Previous LBHF Local Plan Regulation 18 version provided alternative options which the OPDC Local did not.</p>	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	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 developing the policies in its plan. They must be sufficiently distinct 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
					<p>highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.”</p> <p>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 capacities as reasonable alternatives, particularly as these would have not have been in general</p>

Comment reference	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>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. Therefore the approach taken in the Local Plan continues to be considered as the most appropriate strategy for the OPDC area.</p> <p>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).</p>
2/G47	General	No sign of an imaginative world class new city being realised as OPDC is conflicted in its roles in determining planning applications and between its development mandates.	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	<p>No change proposed. OPDC as a Local Planning Authority will determine planning applications using the Local Plan, London Plan and any relevant material considerations. This includes Policy SP2 in relation to Good Growth and high densities, Policy SP9 and the Design Chapter that provides guidance to deliver high quality high density development.</p> <p>In the event that OPDC becomes a landowner and/or developer, its development and planning functions would be clearly defined and carefully managed to avoid conflicts of interest and to maintain the integrity and impartiality of the</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					planning process. OPDC as developer would be subject to the same planning requirements as private developers.
2/G48	General	No sign of an imaginative world class new city being realised as the Local Plan has not made changes in response to local residents and community groups.	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	No change proposed. Local Plan has been amended as a direct result of consultation comments from residents and community groups. These are set out in the Statement of Consultation and within the tracked-change version of the second Regulation 19 Local Plan. Where suggested changes have not been made, the Statement of Consultation provides a response setting out the reasons why.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/G49	General	After the lifetime of the OPDC, LBHF will need to deal with the long-term consequences of the Local Plan. LBHF should have a far greater say in the planning policies and applications to be decided in the next 5-year period.	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	No change proposed. OPDC has worked closely with LBHF during its development to ensure it delivers the council's aspirations and duties for the Old Oak area. OPDC having been meeting with LBHF officer fortnightly at Duty to Cooperate meetings. LBHF have two members on OPDC's Planning Committee, reflecting the majority of Old Oak development will be in LBHF and has representation on OPDC Board which shape and approve planning policies.
2/G50	General	Support for development potential and role of Local Plan. Plan is sound but would benefit from addressing errors.	1	Imperial College	Noted.
2/G51	General	Overview of existing Imperial College investment in White City. Support for potential delivery of research floorspace in Old Oak and protection of Park Royal.	1	Imperial College	Noted.
2/G52	General	Support for aims and vision of OPDC and regeneration of Park Royal. Reserve right to make further comments at any future stage.	1	Osbourne Investments Limited and Quattro Holdings Limited	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
2/G53	General	Local Plan does not take into account previous comments. Previous comments still stand. Reserve right to submit further representations and appear at Examination.	1	Ashia Centur Limited	Noted.
2/G54	General	Overview of Cargiant activities and relocation. Confirm development of Old Oak Park masterplan will take place following certainty on transport infrastructure is given. Planning application has been delayed due to on going Old Oak Masterplan. Support Local Plan, the detailed engagement to date and that some changes have been made in response to previous comments.	1	Old Oak Park Limited	Noted.
2/G55	General	Continued concern regarding unachievable target for affordable housing that does not reflect the significant cost of infrastructure.	1	Old Oak Park Limited	No change proposed. OPDC has undertaken an Affordable Housing Viability Assessment (AHVA) which tested and identified achievable affordable housing scenarios. The supporting text to Policy H2 clarifies that on some sites within OPDC, affordable housing targets 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. Affordable housing target policies are subject to viability if

Comment reference	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 cannot meet the London Plan requirements.
2/G56	General	Local Plan remains long and detailed providing guidance beyond the remit of planning. Understand this reflects OPDC's high aspirations for new development but this risks an increased burden on development when it should be more streamlined.	1	Old Oak Park Limited	No change proposed. OPDC considers that the Plan strikes an appropriate balance in the level of detail it provides, but revisions to try and simplify the Plan have been made where necessary and appropriate in response to Regulation 19(1) comments. 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.
2/G57	General	Confirm there is much to support in the Local Plan but some issues remain where further engagement would be appreciated. Confirm that the plan is positively prepared but not fully justified in places.	1	Old Oak Park Limited	Noted. OPDC is keen to continue engagement with landowners to deliver the Local Plan's Spatial Vision. Please refer to individual responses to comments.
2/G58	General	Overview of SEGRO's activities	1	SEGRO	Noted.
2/G59	General	Welcome opportunity to comment. Comments from Regulation 19(1) response are not repeated. Identify policies not considered to be sound. Wish to engage positively and attend examination.	1	London Borough of Brent	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
2/G60	General	OPDC's Local Plan is required to be in general conformity with the current London Plan, however its policies will need to be considered alongside the draft London Plan. The draft London Plan and its evidence base is a material consideration in planning decisions, and gains more weight as it moves towards publication. In this regard, the Mayor welcomes the fact that OPDC have, through this second Regulation 19 version, made amendments to reflect the draft London Plan.	1	Mayor of London	Noted.
2/G61	General	Release of SIL within Old Oak is consistent with GLA evidence base	1	Mayor of London	Noted.
2/G62	General	Support for Spatial Vision and Foreword	1	Royal Borough of Kensington and Chelsea	Noted.
2/G63	General	Supporting for working with OPDC to improving connections with Kensal Canalside Opportunity Area. Local Plan should further recognise this link and potential Crossrail Station.	1	Royal Borough of Kensington and Chelsea	No change proposed. Places policies identify connections to Kensal Canalside within place diagrams and in supporting text to Policy P10. OPDC considers references to a potential new station at Kensal Canalside are appropriate to be made in Strategic Policies chapter.
2/G64	General	Development on North Pole East depot should be identified to be delivered in the plan period.	1	Royal Borough of Kensington and Chelsea	No change proposed. The phasing of development is defined in OPDC's Development Capacity Study (DCS). The DCS has been developed in accordance with National Planning Practice Guidance for Housing and Employment Land

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Availability Assessments. This considers deliverability and developability of sites to inform phasing. The site is required as temporary use as a construction logistics depot for utilities projects in the short/medium term and the lease for rail use runs until after 2038. As such, the site is currently not available during the plan period. However, supporting text to P10 supports earlier delivery of development on the site.

## 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
2/Intro/1	Introduction	In relation to paragraph 113a, OPDC does not include major road connection points to the strategic road network. These are congested. Access roads into the OPDC area do not have capacity for public transport systems. Therefore creating a well-connected world class transport interchange is not possible.	1	West Twyford Residents Association	No change proposed. The Local Plan's transport supporting studies demonstrate that a new movement network is viable and is capable of providing capacity for providing public transport services alongside new walking and cycling routes. Park Royal benefits from direct connections to the strategic road network. The Park Royal Transport Strategy sets out transport interventions required to mitigate impacts of development and support traffic flows.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/Intro/2	Introduction	No reference is made in the introduction regarding the interface between the Elizabeth Line and Old Oak Common Station.	1	West Twyford Residents Association	No change proposed. Guidance for managing this relationship is set out in Policy P1 and P1C1.

### Spatial vision

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SV1	Spatial Vision	Capacity of 7,600 new jobs in Park Royal is incorrect. This should reference the 40,400 instead.	1	Imperial College	Change proposed. The 7,600 relates to jobs capacity across Park Royal SIL. To provide clarity for the total jobs capacity, this figure is proposed to be replaced with the total 40,400 jobs capacity figure.
2/SV2	Spatial Vision	Number of new jobs should be amended to reflect the correct figure of 40,400.	1	Imperial College	Change proposed. The reference to 7,600 relates to the indicative job capacity of Park Royal. To ensure clarity, the total OPDC area plan period indicative job capacity figure of 40,400 will be used and related wording amended.
2/SV3	Spatial Vision	Suggest additional text is included to ensure that the Local Plan reflects the reality of the years of neglect, OPDC 's role and the roles and individual priorities of the constituent London Boroughs.	1	John Cox	No change proposed. Contextual information is set out in figure 21.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SV4	Spatial Vision	The proposed deletion of the reference to enhancing the canal as a green and blue link, referring only the green element could be open to misinterpretation in terms of targeting enhancement opportunities, to the detriment of the canal.	1	Canal & River Trust	No change proposed. The proposed deletion has been made to align with the definition of green infrastructure within the Local Plan glossary. This confirms that green infrastructure includes blue infrastructure and the Blue Ribbon Network.
2/SV5	Spatial Vision	The Council welcomes the amendment to the Going Local Objective 13. Remain concerned that the strategic policies within the plan do not seek to deliver the proposed east-west connection between the OPDC area and Kensal over the Plan Period. The Council supports the amendment to the Key Diagram at Figure 2.2 and subsequent maps / diagrams throughout the Plan, which indicate the east-west link between the OPDC area and Kensal OA as a 'key route'.	1	Royal Borough of Kensington and Chelsea	No change proposed. Places policies identify connections to Kensal Canalside within place diagrams and in supporting text to Policy P10. OPDC considers references to a potential new station at Kensal Canalside are appropriate to be made in Strategic Policies chapter.
2/SV6	Spatial Vision	Welcome added references. Hythe Road and Old Oak Common Stations should be referred to as 'potential' new stations throughout the document.	1	Transport for London	Change proposed. All text and image references will be referred to as potential stations.
2/SV7	Spatial Vision	TfL requests that the Major Town Centre/Commercial Centre shading is removed from the Elizabeth Line depot site area. This is potentially misleading as this site has been removed as a site allocation within the local plan period. This comment is also relevant to a number of other figures in the document e.g. Figure 3.7, 3.15, 10.3	1	Transport for London	No change proposed. The supporting text to Policy P1 supports early delivery of the Elizabeth Line Depot. OPDC considers it appropriate to provide guidance for the depot should this be achieved.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SV8	Spatial Vision	Could 'protection' also be added to the Vision?	1	Wormwood Scrubs Charitable Trust	No change proposed. Spatial Vision narrative 9 sets out the aspiration to conserve and enhance Wormwood Scrubs. Policy P12 also sets out the need to conserve and enhance Wormwood Scrubs.
2/SV9	Spatial Vision	The Scrubs is more than just MOL and its unclear what the Local Plan means by Metropolitan Park.  It is the size and range of potential uses of the Scrubs that has Metropolitan value and this role must protect all habitats and uses of value.	1	Wormwood Scrubs Charitable Trust	Noted. Policy P12 sets out the roles of Wormwood Scrubs. The glossary is proposed to be amended to define a Metropolitan Park. The London Plan defines the functions of a Metropolitan Park. Policies P12, EU1 and EU2 provide guidance for conserving and enhancing Wormwood Scrubs including biodiversity assets.
2/SV10	Spatial Vision	The scrubs have Metropolitan value. Addition/change suggested to Thinking Big (5)	1	Wormwood Scrubs Charitable Trust	No change proposed. References to Wormwood Scrubs being Metropolitan Open Land and a Metropolitan Park illustrate that the Scrubs has metropolitan value.
2/SV11	Spatial Vision	Natural heritage should be recognised. Changes to Going Local (9) suggested.	1	Wormwood Scrubs Charitable Trust	No change proposed. Natural heritage is addressed through environmental and heritage assets stated in narrative 9.
2/SV12	Spatial Vision	Support the overall spatial vision and encourage OPDC to work proactively with all interested parties.	1	Queens Park Rangers Football Club and Stadium Capital Developments	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
2/SV13	Spatial Vision	Transport Orientated Development – should note that the provision of a new bridge link between the Station and the regeneration area to the south, landing in the European Metals Recycling (EMR) site, will bring about significant benefits.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. The supporting text to Policy P2 sets out the benefits and challenges to delivering a new walking and cycling route between Willesden Junction and Old Oak North.
2/SV14	Spatial Vision	Place Making/Deliverability – should be noted that early delivery of new housing and commercial space is being achieved at Oakland and the other sites offer an opportunity to deliver early development and assist wider development, including EMR site.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Policy SP9 provides guidance that supports the delivery of early development. A reference to a single specific site within the spatial vision is not considered to be required.
2/SV15	Spatial Vision	Grand Union Canal and Wormwood Scrubs – Support the reference to enhancing access to Wormwood Scrubs so that it can be enjoyed by more Londoners.	1	Queens Park Rangers Football Club and Stadium Capital Developments	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
2/SV16	Spatial Vision	Would like to see a strengthening of the policy requirements relevant to tall buildings. Wording should be changed.	1	Grand Union Alliance	No change proposed. The Draft New London Plan requires local planning authorities to identify locations where tall buildings are an appropriate form of development in principle. Policy SP9 provides guidance to ensure buildings respond appropriately to the setting of sensitive locations including heritage assets, open spaces, existing residential communities. 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. Relevant Local Plan policies include D4, D5, D6 and D8 and place policies.

### ***Strategic Policies Chapter***

#### **Policy SP1- Catalyst for Growth**

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP1/1	Strategic Policies	Support for delivering a range of uses to support London's role as a global city	1	Imperial College	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
2/SP1/2	Strategic Policies	Recognition of a potential new station at Kensal Canalside is welcomed. Place policies should be aligned with this.	1	Royal Borough of Kensington and Chelsea	No change proposed. Places policies identify connections to Kensal Canalside within place diagrams and in supporting text to Policy P10. OPDC considers references to a potential new station at Kensal Canalside are appropriate to be made in Strategic Policies chapter.
2/SP1/3	Strategic Policies	Support amendment that new town centres won't adversely impact existing centres.	1	Royal Borough of Kensington and Chelsea	Noted.
2/SP1/4	Strategic Policies	Amendments to the Local Plan successfully reflect uncertainties in delivering a new station at Kensal Canalside.	1	Transport for London	Noted.
2/SP1/5	Strategic Policies	Potential for early catalyst uses and infrastructure should be recognised in the policy and supporting text.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. For the purposes of the Local Plan, catalyst uses are uses that can stimulate significant and positive change, rather than infrastructure. The benefits of increased PTALs and development capacity from a connection to Willesden Junction Station from Old Oak North are set out in policies P2 and P11 and are not required to be repeated in Policy SP1.
2/SP1/6	Strategic Policies	Support for the Mayor in steering London to be a world leader in industry, economy, communication, environment, and high quality of life for all of its people. OPDC represents an opportunity to create a new London.	1	Grand Union Alliance	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
2/SP1/7	Strategic Policies	Aspiration to meeting local needs and complementing surrounding centres has been watered down from 'promoting' to 'supporting'.	1	Harlesden Neighbourhood Forum	No change proposed. Policy SP1 has been strengthened to include both promoting and supporting. The supporting text relating to complement the wider network of town centre was removed to avoid repetition with policy SP6.

#### Policy SP2- Good Growth

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP2/1	Strategic Policies	Proposed addition of wording to Paragraph 3.8 providing spatial guidance for Park Royal.	1	John Cox	No change proposed. Policy P4 provides spatial guidance for strengthening and intensifying Park Royal Strategic Industrial Location.
2/SP2/2	Strategic Policies	References to the transport principles of Good Growth should be provided in the policy, supporting text and cross referenced with the Transport Chapter.	1	Transport for London	Change proposed. Policy SP7 is the strategic policy for transport. To ensure, the role of transport in delivering Good Growth is recognised, supporting text to policy SP7 will be amended to make reference to the transport principles for Good Growth.
2/SP2/3	Strategic Policies	Consider adding a new strategic policy on the issue of climate change adaptation.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy SP2 provides guidance for delivering a environmentally resilient development, that is adaptive to and resilient to climate change.
2/SP2/4	Strategic Policies	First Regulation 19 consultation comments still apply.	1	A40 Data Centre B.V	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
2/SP2/5	Strategic Policies	Support shown for SP2 and SP9.	1	A40 Data Centre B.V	Noted.
2/SP2/6	Strategic Policies	Air pollution created by development will need to be monitored.	1	Central Acton Neighbourhood Forum	Noted. Policy EU4 provides guidance for ensuring development proposals make a positive contribution to an overall improvement in air quality.
2/SP2/7	Strategic Policies	Rail stations should form a walking and local transit convenience, close to homes and jobs.	1	Grand Union Alliance	Noted. Policy T5 provides guidance to ensure stations are integral parts of the local street and movement network and incorporate active frontages. Place policies provide guidance for delivering development adjacent to relevant stations.
2/SP2/8	Strategic Policies	Rail stations should be accessible, of a high quality and mixed used.	1	Grand Union Alliance	Noted. Policy T5 provides guidance to ensure stations are of an outstanding design quality, are destinations and include a range of land uses.
2/SP2/9	Strategic Policies	Objections provided as the Local Plan introduces densities above existing London Plan guidance and greater than previous drafts of the Local Plan. Increasing densities has been consistent through the development of the Local Plan. Density levels are not clearly stated in the plan outside of the glossary which does not accord with the NPPF requirements for clarity. Proposed densities for each site should be published for consultation based on development capacity of site allocations.	27	Nye Jones, Gail Dobinson, Natasha Salkey, Rachel Ritfeld, Ciara Solmi, Bernie Timmins, Jane Dreaper, M. Szoke, James Trew, Eileen Hannington, Marta Donaghey, Jamie Sutcliffe, TITRA, Pablo Navarrete, Jason Salkely, Elaine	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised the issue	Name of consultees who raised the issue	OPDC Response
		<p>A review of the Regulation 19(1) Local Plan by Cambridge and Berkeley universities and University of Texas demonstrates average densities of 550u/ha and suggests implications for these densities should be made clearer and a reduction in development. Delivering building typologies and sustainable communities at these densities has not been tested and is opposed by local people. Examination provides last opportunity for this issues to be raised.</p>		<p>Gristock, David Turner, Nicky Guymer, Midland Terrace Residents, Bruce Stevenson, Elaine Gristock, Thomas Dyton, Wells House Road Residents Association, The Hammersmith Society, Old Oak Neighbourhood Forum, St Quintin and Woodlands Neighbourhood Forum</p>	<p>As such, the current London Plan 2016 (Policy 2.13) and the Draft New London Plan (Policy SD1) supports development in these areas that potentially exceeds defined targets by optimising development densities. The Mayor of London's Housing SPG (2016) paragraphs 7.5.7 and 7.5.8 state 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 the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2). The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities. The density range set out in the Local Plan remains unchanged from the Regulation 18 draft Local Plan.</p> <p>OPDC's Development Capacity Study has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments to demonstrate how the London plan targets can be delivered. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal Development Framework Principles, the Industrial Land Review, Future Employment Growth Sectors Study,</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised the issue	Name of consultees who raised the issue	OPDC Response
					<p>Scrubs Lane Development Framework Principles document and the Victoria Road and Old Oak Lane Framework Principles document.</p> <p>No change proposed. Paragraph 10 of the NPPF (2012) requires that "Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas." The average density has been provided in policy SP9 supporting text. The density ranges are set out in the glossary based on information provided in the Development Capacity Study. Providing densities for each site allocation is not considered to be required to fulfil the role of a Local Plan as a strategic planning document. OPDC considers policies SP9 and D5 are consistent with the requirements of NPPF regarding clarity of Local Plans.</p> <p>No change proposed. The student reviews are noted and reflect the average density of 600 units per hectare for Old Oak North set out in the Old Oak North Development Framework Principles. The Local Plan provides series of policies to ensure that high density typologies, required to optimise development capacity to meet targets, are of the highest design quality to support sustainable communities and</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised the issue	Name of consultees who raised the issue	OPDC Response
					appropriately address issues such as, inter alia, context and townscape (SP9), access, inclusivity and Healthy Streets (D2), amenity (D6), provision of 30% publicly accessible open space (EU1), air quality (EU4), high quality social infrastructure provision (TCC4) and noise and vibration (EU5). These policies will be supplemented by forthcoming supplementary planning documents.
2/SP2/10	Strategic Policies	There is no precedent listed for the higher range densities	1	London Borough of Hammersmith and Fulham	No change proposed. High density precedents are set out in the Development Capacity Study and the Precedents study.
2/SP2/11	Strategic Policies	Support the strong environmental standards being sought through Chapter 6 (Environment and Utilities), and challenge the OPDC to make a commitment to achieve environmental net-gain as set out in in "A greener future: the Governments 25 Environment Plan'.	1	Environment Agency	Change proposed. OPDC consider that the policies across the Local Plan will help to ensure that development achieves environmental net gain as set out in "A greener future: the Governments 25 Environment Plan". Specific reference to the Governments aims for environmental net gain have been included in the supporting text to Policy SP2 (Good Growth).



### 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
2/SP3/1	Strategic Policies	The reference to the Healthy Streets approach and mode shift in the supporting text is welcomed although the importance of encouraging active and sustainable travel should be included as a core part of this policy.	1	Transport for London	No change proposed. Policy SP7 provides guidance to support active and sustainable travel.
2/SP3/2	Strategic Policies	Need a commitment that health and welfare and public services will be protected, monitored and if necessary enhanced during all the period of development.	1	Central Acton Neighbourhood Forum	No change proposed. Policy TCC4 on Social Infrastructure seeks to protect and existing facilities and supports proposals for new and enhanced facilities. Types of social infrastructure can include health, education, emergency service and community infrastructure.
2/SP3/3	Strategic Policies	Concern about how proposals, including industrial intensification, will affect the quality of residential areas. SP3 should be at forefront of any redevelopment plans for this site.	1	Grand Union Alliance	No change proposed. Policy SP3 applies across the whole OPDC area, including Park Royal. Local Plan policies SP9, D4, D5, D6, EU4 and EU5 with London Plan policies and national guidance will be used to ensure existing residential areas benefit from appropriate standards of amenity.
2/SP3/4	Strategic Policies	It is possible for two adjacent “new city centres” to be formed in the core area, one more associated with the new stations, the other forming a link with Willesden Junction and Harlesden to the north. A new range of jobs, amenities, homes, shops, and street environments can be brought to the area. All buildings should be scaled in relationship to the qualities of pedestrian streets, - dense, but also able to capture the beneficial	1	Grand Union Alliance	Noted. Policy SP6 provides guidance for the distribution of land uses, including town centre and employment uses. Policy TCC1 provides further detail for the location of town centre uses and approach to managing impacts on existing centres. Policies SP9, D2, D4, D5 and D6 provide guidance in relation to the design of the public realm and built form.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		effects of sun and with small pocket parks. Historically, this sense of mixed, complex city street can be found in St James, Marylebone, Bermondsey, and Bloomsbury.			
2/SP3/5	Strategic Policies	Old Oak Common and Park Royal plans should emphasize health as a lead quality by offering clean air, have few polluting vehicles, and a healthy walking environment. This should be complemented by local food production.	1	Grand Union Alliance	No change proposed. Improving health and reducing health inequalities is part of OPDC's strategic policy approach as demonstrated through the inclusion of Policy SP3. Other policies in the Local Plan will promote improvements in air quality (Policy EU4), promote delivery of the Healthy Streets Approach (T1), support walking (T2) and deliver new urban greening that can include food growing facilities (EU1 and EU2).
2/SP3/6	Strategic Policies	The term "healthy streets" could be interpreted to a narrow definition of "streets". Additional text should be added to clarify that the term encompasses green and blue infrastructure, off road routes etc which all contribute to providing sustainable active travel routes.	1	Canal & River Trust	No change proposed. The Healthy Streets approach covers 10 themes. This is clearly set out in Policy T1 and in the Mayors Transport Strategy.

## 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
2/SP4/1	Strategic Policies	Old Oak North Masterplan consultants should guide homes and jobs figures and not be guided by existing targets.	2	Thomas Dyton, Wells House Road Residents Association	No change proposed. The Old Oak North Development Framework Principles has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. The consultants undertook a robust assessment of the technical constraints within the Old Oak North area and parts of Scrubs Lane. The deliverability of policies P2 and P10 were also tested, including development capacity for new homes and jobs. This assessment has resulted in amendments to the policies P2 and P10 which includes adjustments to the new homes (6,300 to 6,500) and new jobs (5,100 to 3,600).
2/SP4/2	Strategic Policies	There is a need for a commitment to continue to delivery public services while development takes place and to address any negative impacts from construction on local amenity.	1	West Acton Residents Association	Noted. Policies SP4 and TCC4 provide guidance for the timely delivery of social infrastructure. Policies D6, EU4 and EU5 provide guidance to ensure development does not cause unacceptable harm to existing communities.
2/SP4/3	Strategic Policies	Community may be lost during and after development. Consideration of supporting communities in high density development should be provided.	2	West Acton Residents Association, Anita Ringsell	Noted. Policy SP4 and TCC4 seek to provide social infrastructure facilities to support sustainable communities.
2/SP4/4	Strategic Policies	There should be no more flats as there is an over-supply of flats in the area and not enough infrastructure.	1	Maria Lonergan	No change proposed. The Old Oak and Park Royal Opportunity Areas can provide at least 25,500 new homes in accordance with the London Plan. The OPDC Strategic

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised the issue	Name of consultees who raised the issue	OPDC Response
					Housing Market Assessment identifies a need for 99,000 homes across Brent, Ealing and Hammersmith & Fulham. Development in OPDC needs to help to meet this overall need. The Infrastructure Delivery Plan (IPD) identifies the infrastructure required to support the regeneration of the area, including social, transport, utility and green infrastructure.
2/SP4/5	Strategic Policies	We welcome the recognition in 3.21 and elsewhere in the document that major development schemes such as OOP are required to provide significant new infrastructure, and that this requirement will need to be balanced against affordable housing and other matters.	1	Old Oak Park Limited	Noted.

2/SP4/6	Strategic Policies	Object to Policy SP4 because of excessive and unjustified housing targets. Independent academic research from the University of Cambridge suggests that the housing targets should be reduced to 18,000 homes for local communities to be sustainable in the future.	24	<p>Nye Jones, Gail Dobinson, Rachel Ritfeld, Ciara Solmi, Jane Dreaper, James Trew, Stephanie Hewett, Eileen Hannington, Marta Donaghey, Jamie Sutcliffe, Pablo Navarrete, Jason Salkely, Elaine Gristock, David Tiurner , Nicky Guymenr, TTRA, Thomas Dyton (WHRRRA), Midland Terrace Residents, St Quintin and Woodlands Neighbourhood Forum, Wells House Road Residents Association, Mark Walker, Alison Brayshaw, Catherine Goodall, The Hammersmith Society, West Acton Residents Association</p>	<p>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) and the Draft New London Plan (Policy SD1) supports development in these areas that potentially exceeds defined targets by optimising development densities. The Mayor of London's Housing SPG (2016) paragraphs 7.5.7 and 7.5.8 state 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). The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities. The density range set out in the Local Plan remains unchanged from the Regulation 18 draft Local Plan.</p> <p>The OPDC Development Capacity Study identified the indicative capacity for new homes in the area based on the requirements of the Government's Housing and Economic Land Availability</p>
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					<p>Assessment, as required by National Planning Practice Guidance. This supports Policy SP4 In delivering at least 20,100 additional homes between 2018 to 2038.</p> <p>No change proposed. The student reviews are noted and reflect the average density of 600 units per hectare for Old Oak North set out in the Old Oak North Development Framework Principles. The Local Plan provides series of policies to ensure that high density typologies, required to optimise development capacity to meet targets, are of the highest design quality to support sustainable communities and appropriately address 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). These policies will be supplemented by forthcoming supplementary planning documents.</p>
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Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP4/7	Strategic Policies	Concerns about the commitment to build genuinely affordable homes.	4	Thomas Dyton (WHRRRA), Central Acton Neighbourhood Forum, Wells House Road Residents Association, West Acton Residents Association	No change proposed. Policy SP4a)ii) sets out a requirement to deliver 20,100 homes and supports the attainment of 50% affordable housing, subject to viability. This is in conformity with the draft London Plan and is supported by OPDC's Strategic Housing Market Assessment (SHMA) which identifies a need for approximately 50% affordable homes. Policy H2c) and Table 8.2 provide for the delivery of "genuinely" affordable homes that meet the requirements of the National Planning Policy Framework and the draft London Plan.
2/SP4/8	Strategic Policies	Need for a long-term commitment to public services and support for the existing communities while the development takes place.	2	Thomas Dyton (WHRRRA) Wells House Road Residents Association	No change proposed. Development will be guided by OPDC's Strategic Vision (Chapter 2 ). This means that benefits from development will be generated for existing communities, for example; by providing affordable housing for local people, opportunities for local businesses, conserving existing heritage assets and providing convenient access to town centre uses, shops, schools, parks, community facilities, leisure and sports. In addition, Policy D6 requires new development to deliver an appropriate standard of amenity (including Daylight, Sunlight and Microclimate), as well as implementing the Agent of Change principle so that that new development does not cause unacceptable harm to the amenity of existing 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
2/SP4/9	Strategic Policies	Education should be a prime consideration, encouraging integrated, accessible schools at every level. There is a need for technical education and training. With new, high levels of accessibility, this will be an ideal location for joint ventures with local industry in developing job skills.	1	Grand Union Alliance	No change proposed. The Social Infrastructure Needs Study identifies the educational needs derived from the projected growth in population in the OPDC area. The infrastructure required to meet this need are set out in OPDC's Infrastructure Delivery Plan. In accordance with Policy TCC4, OPDC is working with service providers to develop a preferred approach to the delivery of new education facilities. In terms of local industry and skills, Policy E3 requires proposals which generate new employment floorspace to provide affordable work space, shared workspace to support small businesses and start ups. Policy E5 requires major development proposals to provide access for local people to training and employment and supply chain opportunities.
2/SP4/10	Strategic Policies	Support the aims of Policy SP4 but would encourage the OPDC to work with partners, to deliver as much early development as possible.	1	HGH Consulting ON BEHALF OF Queens Park Rangers Football Club and Stadium Capital Developments	Noted. Policy SP10 and Policy DI2 supports the early delivery of homes where this is appropriately supported by 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
2/SP4/11	Strategic Policies	Proposals for the 'heart' of a new Old Oak (a high density commercial development around the HS2/Queen Elizabeth Line station) no longer feature in the document and have been pushed back beyond the 2018-38 plan period. On the other, a housing target dating from the 2015 OAPF and included in a brief annexe to the 2015 Further Alterations to the London Plan has continued to be treated as sacrosanct.	2	Midland Terrace Residents, St Quintin and Woodlands Neighbourhood Forum	<p>No change proposed. The Elizabeth Depot site is expected to continue to be delivered but after the Local Plan period (2038). Development of the sites adjacent to the Old Oak Common Station continue to be included in the plan period.</p> <p>The published Further Alterations to the London Plan (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. This target is for the total development beyond which includes phases after the plan period. This target continues to be included in the current and Draft New London Plan. To demonstrate how these targets will be met and ensure general conformity with the London Plan, OPDC's Development Capacity Study has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal 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. OPDC's plan period overall target is for 20,100 new homes.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised the issue	Name of consultees who raised the issue	OPDC Response
2/SP4/12	Strategic Policies	Planning Inspector Mr A Thickett on the 2014 FALP EiP noted that it cannot be assumed that it will be appropriate to increase densities over the existing Density Matrix guidelines in all cases.... Opportunity Areas and large sites have the potential to determine their own character and identity but they should still have regard to their surroundings. Meeting the pressing need for housing in London will require new, innovative and possibly unpopular solutions but care must be taken not to damage its environment such that it becomes an unpleasant place to visit, live and work.	2	Midland Terrace Residents, St Quintin and Woodlands Neighbourhood Forum	<p>No change proposed. 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 only reflecting local context and not the evolving 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. The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities. The density range set out in the Local Plan remains unchanged from the Regulation 18 draft Local Plan.</p> <p>The Spatial Vision and the Going Local Narratives set out aspirations to benefit local people's quality of life and ensure development complements surrounding neighbourhoods. These aspirations are embedded in the policies of the Local Plan. Particularly, Policy SP2 provides guidance to deliver Good Growth and sustainable development, Policy SP3 provides guidance to improve health and reduce</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised the issue	Name of consultees who raised the issue	OPDC Response
					health inequalities, Policies SP4 and SP5 provide guidance for the delivery and distribution of a wide range of homes and jobs, Policy SP6 provides guidance to celebrate local context, Policy SP7 provides guidance to ensure new streets and routes connect to existing neighbourhoods, Policy SP9 provides guidance to ensure development is high density, high quality and positively responds to local context, character and heritage. In addition to the strategic policies, policies D6, EU4 and EU4 provide guidance to deliver an appropriate standard of amenity.
2/SP4/13	Strategic Policies	The housing target was set pre-Brexit and takes no account of changing demographic forecasts for London's population growth.	2	Midland Terrace Residents, St Quintin and Woodlands Neighbourhood Forum	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

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised the issue	Name of consultees who raised the issue	OPDC Response
					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 explicitly account for 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 when the impact of Brexit on population is better known.
2/SP4/14	Strategic Policies	HS2, TfL, and other bodies have flagged up the non-viability of development of key sites at the heart of the 2013 'vision' for Old Oak.	2	Midland Terrace Residents, St Quintin and Woodlands Neighbourhood Forum	No change proposed. The Crossrail Depot site is expected to continue to be delivered but outside of the Local Plan period. This means that the development capacity associated with the site, including housing units, will be delivered after 2038 and OPDC's housing targets are not reliant on these sites coming forward for delivery in the plan period.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised the issue	Name of consultees who raised the issue	OPDC Response
2/SP4/15	Strategic Policies	There is a need for social infrastructure and affordable homes that are genuinely needed not lots of student halls.	1	West Acton Residents Association	No change proposed. Policy SP4 provides for the delivery of 50% affordable housing, subject to viability and delivering and/or contributing to new high quality social infrastructure and improving existing. In relation to North Acton, Policy P7c)ii) will deliver appropriate levels of student accommodation in accordance with Policy H10 in that it does not undermine the delivery of conventional housing.
2/SP4/16	Strategic Policies	The opportunity to build 1,000s of much needed Social Homes for Rent in the OPDC has been missed.	1	Eric Leach	No change proposed. Policy H2c) and Table 8.2 provide for the delivery of "genuinely" affordable homes that meet the requirements of the National Planning Policy Framework and the draft London Plan. 30% of the affordable homes will be provided as low-cost London Affordable Rent (social rent) in accordance with the draft London Plan.

## 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
2/SP5/1	Strategic Policies	Jobs and homes should be distributed across the OPDC area.	1	Grand Union Alliance	Noted. Policies SP5 and SP6 and Place Policies provide spatial guidance for distributing land uses.
2/SP5/2	Strategic Policies	Plans should respect local people and respond to local context. The Local Plan is not achievable and will harm the local area with an isolated station complex and tower blocks. A greater spread of land uses should be provided to deliver a high quality of life.	1	Grand Union Alliance	No change proposed. The Spatial Vision and the Going Local Narratives set out aspirations to benefit local people's quality of life and ensure development complements and is connected with surrounding neighbourhoods. These aspirations are embedded in the policies of the Local Plan. Particularly, Policy SP2 provides guidance to deliver Good Growth and sustainable development, Policy SP3 provides guidance to improve health and reduce health inequalities, Policies SP4 and SP5 provide guidance for the delivery and distribution of a wide range of homes and jobs, Policy SP6 provides guidance to celebrate local context, Policy SP7 provides guidance to ensure new streets and routes connect to existing neighbourhoods, Policy SP9 provides guidance to ensure development is high density, high quality and positively responds to local context, character and heritage.
2/SP5/3	Strategic Policies	Local jobs are needed	1	West Acton Residents Association	Noted. Policies SP5 and E5 provide guidance to secure local access to training, employment and economic opportunities.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP5/4	Strategic Policies	Support proposed delivery of new jobs and a major new commercial centre.	1	Imperial College	Noted.
2/SP5/5	Strategic Policies	Development on, or over Old Oak Common station remains outside the scope of HS2's work.	1	HS2 Ltd.	Noted. This is reflected in Policy P1C1.
2/SP5/6	Strategic Policies	There is a need for training programmes and opportunities for local people to work on both the area development and in new businesses created by the development. There should be equal opportunities for people and investment in digital/IT skills and equipment.	2	Thomas Dyton; Wells House Road Residents Association	Noted. Policy E5 requires a Local Labour Skills and Employment Strategy and Management Plan (LLSESMP) to be provided for major development proposals. A LLSESMP would include detailed information on jobs, skills, supply chain and mitigation. New, on site skills training centres could be delivered as part of implementing a LLSESMP, if that was considered appropriate.
2/SP5/7	Strategic Policies	New jobs target is potentially unsound as it is not clear that it is informed by a robust evidence base. Development Capacity is based on assessment of Park Royal SIL designation as a single, broad location. Further work is required that considers individual sites within the Park Royal.	1	Aberdeen Standard Investments	No change proposed. Development capacity has been identified using National Planning Practice Guidance Housing and Economic Land Availability Assessment guidance. For Park Royal, this has been informed by evidence in the Park Royal Intensification Study, which considered a range of case study sites and other potential intensification sites. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable and viable. The jobs figures are not maximum targets but they do provide 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
					indication of the number of jobs that could be delivered over the plan period. Policies SP5 and E1 are clear that development within SIL should help contribute towards meeting the strategic target of 40,400 new jobs. SP1 and E1 set clear priorities for SIL in seeking to protect, strengthen and intensify it in order to ensure the delivery of additional floorspace as well as new jobs.
2/SP5/8	Strategic Policies	Welcomes the OPDC and the Local Plan's support for surrounding areas – (specifically Harlesden).	1	Harlesden Neighbourhood Forum	Noted.
2/SP5/9	Strategic Policies	Request that the Major Town Centre/Commercial Centre shading is removed from the Elizabeth Line depot site area. This is potentially misleading as this site has been removed as a site allocation within the local plan period.	1	Transport for London	No change proposed. The supporting text to Policy P1 supports early delivery of the Elizabeth Line Depot. OPDC considers it appropriate to provide guidance for the depot should this be achieved.
2/SP5/10	Strategic Policies	Support the identification of a new Major Town Centre in Old Oak North as illustrated on Figure 3.7. The early development of the EMR site can make a major contribution to this Centre	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.



## 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
2/SP6/1	Strategic Policies	Welcome clarification in relation to meanwhile uses.	1	Old Oak Park Limited	Noted.
2/SP6/2	Strategic Policies	Support plans for a new Cultural Quarter at Old Oak, but the ambition for this has been watered down compared to earlier iterations of the plan. OPDC should proactively seek to bring a major cultural catalyst to the area.	2	The Hammersmith Society; Alan Goodearl, Thomas Dyton, Wells House Road Residents Association	<p>No change proposed. The wording in Policy SP8 citing the delivery of a new Cultural Quarter at Old Oak has not changed from first revised draft version of the Local Plan. The policy is also clear that OPDC will support the delivery of appropriate catalyst uses.</p> <p>Policy TCC8 sets out the four broad categories of potential catalyst uses, and it is not considered appropriate to prioritise one particular category. However, through Policy TCC5 (Culture and Art) and the place policies for Old Oak North and Old Oak South, the Local Plan requires development to support delivery of a new cultural quarter in Old Oak. Proposals for catalysts uses which support delivery of this would be viewed positively.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP6/3	Strategic Policies	Policy and supporting text should be amended to refer to the protection of valuable heritage and environmental assets through place in placemaking.	1	Wormwood Scrubs Charitable Trust	No change proposed. The protection of heritage assets is addressed through Policy SP9 (Build Environment) and Policy D8 (Heritage). The protection of environmental assets is addressed through Strategic Policy SP8 (Green Infrastructure and Open Space) and the policies EU1 (Open Space) and EU2 (Urban Greening and Biodiversity). The protection of heritage and environmental assets is also addressed throughout places policies of chapter 4.
2/SP6/4	Strategic Policies	Figure 3.8 shows Wormwood Scrubs Street within Wormwood Scrubs, which is inconsistent with other figures in the document.	1	Wormwood Scrubs Charitable Trust	Change proposed. Figure 3.8 has been amended to more accurately reflect the boundary of Wormwood Scrubs Place and the location of Wormwood Scrubs Street.
2/SP6/5	Strategic Policies	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.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted. See response to comment SP6/4 from the first regulation 19 draft 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
2/SP6/6	Strategic Policies	The place policies of chapter 4 are wrongly considered strategic policies as they meet the criteria for non-strategic policies as set out in NPPF paras 075 and 076. As a result, this element of the plan is unsound.	1	Old Oak Neighbourhood Forum	No change proposed. OPDC does consider the place policies 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/SP6/7	Strategic Policies	Welcome clarification in relation to meanwhile uses.	1	Old Oak Park Limited	Noted.
2/SP6/8	Strategic Policies	Support plans for a new Cultural Quarter at Old Oak, but the ambition for this has been watered down compared to earlier iterations of the plan. OPDC should proactively seek to bring a major cultural catalyst to the area.	2	The Hammersmith Society; Alan Goodearl	<p>No change proposed. The wording in Policy SP8 citing the delivery of a new Cultural Quarter at Old Oak has not changed from first revised draft version of the Local Plan. The policy is also clear that OPDC will support the delivery of appropriate catalyst uses.</p> <p>Policy TCC8 sets out the four broad categories of potential catalyst uses, and it is not considered appropriate to prioritise one particular category. However, through Policy TCC5 (Culture and Art) and the place policies for Old Oak North and Old Oak South, the Local Plan requires development to support delivery of a new cultural quarter in Old Oak. Proposals for</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					catalysts uses which support delivery of this would be viewed positively.
2/SP6/9	Strategic Policies	Policy and supporting text should be amended to refer to the protection of valuable heritage and environmental assets through place in placemaking.	1	Wormwood Scrubs Charitable Trust	No change proposed. The protection of heritage assets is addressed through Policy SP9 (Build Environment) and Policy D8 (Heritage). The protection of environmental assets is addressed through Strategic Policy SP8 (Green Infrastructure and Open Space) and the policies EU1 (Open Space) and EU2 (Urban Greening and Biodiversity). The protection of heritage and environmental assets is also addressed throughout places polices of chapter 4.
2/SP6/10	Strategic Policies	Figure 3.8 shows Wormwood Scrubs Street within Wormwood Scrubs, which is inconsistent with other figures in the document.	1	Wormwood Scrubs Charitable Trust	Change proposed. Figure 3.8 has been amended to more accurately reflect the boundary of Wormwood Scrubs Place and the location of Wormwood Scrubs Street.
2/SP6/11	Strategic Policies	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.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted. See response to comment SP6/4 from the first regulation 19 draft 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
2/SP6/12	Strategic Policies	The place policies of chapter 4 are wrongly considered strategic policies as they meet the criteria for non-strategic policies as set out in NPPF paras 075 and 076. As a result, this element of the plan is unsound.	1	Old Oak Neighbourhood Forum	No change proposed. OPDC does consider the place policies 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/SP6/13	Strategic Policies	SP6 should make direct reference to Kensal Canalside Opportunity Area' to fulfil the Duty to Cooperate. It is suggested that "Our proposed outcome" should insert "...and complements existing and emerging surrounding town centres."	1	Royal Borough of Kensington and Chelsea	No change proposed. The supporting text to Policy SP1 makes clear reference a list of areas where joint working will be required to ensure that the benefits of regeneration can be fully captured, this includes Kensal Canalside Opportunity Area. Additional references are also included in supporting text to P10, T1 and T3. It is not considered necessary to replicate text on the significance of the Kensal Canalside Opportunity Area already included in SP1. Furthermore, it is not considered appropriate for the Policy to reference the Kensal Canalside Opportunity Areas in isolation as other areas listed in SP1 are also key areas.

## 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
2/SP7/1	Strategic Policies	New routes into and through Wormwood Scrubs should be identified.	1	John Cox	No change proposed. Policy P12 identifies the locations of new and improved access points into Wormwood Scrubs.
2/SP7/2	Strategic Policies	Management/enforcement of private vehicle access-only into Old Oak North should be clearer	2	John Cox, Transport for London	No change proposed. OPDC considers the existing wording to be appropriately clear.
2/SP7/3	Strategic Policies	Welcome clarification regarding restricting private vehicle access to access-only.	1	Transport for London	Noted.
2/SP7/4	Strategic Policies	Old Oak Street connection to Victoria Road should be sub-surface	2	Thomas Dyton, Wells House Road Residents Association	No change proposed. Whilst Park Road is proposed to connect onto Old Oak Common Lane, Old Oak Street is shown as a through connection to Victoria Road. The Local Plan does not specify whether this is above or below ground. Further work will be required to define the design of this route.
2/SP7/5	Strategic Policies	Summary of objectives of policy SP7	1	The Inland Waterways 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
2/SP7/6	Strategic Policies	Dotted connection to Kensal Canalside Opportunity Area should be amended to have same status as other links in the Local Plan	1	Royal Borough of Kensington and Chelsea	No change proposed. Wormwood Scrubs Street is currently identified to be delivered after the plan period. Figure 3.10 shows the key route of Wormwood Scrubs Street towards Kensal Canalside as a potential connection reflecting the level of work undertaken in defining its delivery. Following the completion of any future work demonstrating this connection, future versions of the Local Plan will reflect this accordingly.
2/SP7/7	Strategic Policies	Prefer emphasis for pedestrians, cyclists and buses to be set out in the policy and figure 3.9 to ensure consistency with the Mayor's Transport Strategy. Recognise the need to support active modes is a key priority but the policy needs to acknowledge that use of public transport is needs for longer trips.	1	Transport for London	Change proposed. OPDC's Sustainable Transport Hierarchy is informed by recommendations of the Public Realm, Walking and Cycling Strategy, Old Oak Strategic Transport Study, Park Royal Transport Strategy, Old Oak North Development Framework Principles, Scrubs Lane Development Framework Principles and the Victoria Road and Old Oak Lane Development Framework Principles. The hierarchy considers the recommendations of these documents that are specific to the OPDC area to deliver Healthy Streets, minimise the need to travel and create a high density and highly compact, layered city form that puts local services within easy reach. To deliver these aspirations for the OPDC area, and reflect the needs to minimise the need to travel and support active travel, OPDC considers that it is appropriate to continue

Comment reference	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 separate public transport from pedestrians and cyclists given the direct health benefits demonstrated by walking and cycling. To further align with the Mayor's Transport Strategy, figure 3.9 will be amended to combine pedestrians and cyclists into a single item but will continue to show public transport separately. However, OPDC recognises the importance of delivering new and enhanced public transport services for longer journeys and to optimise development capacities. Supporting text to Policy SP7 will be amended to clarify that the sustainable transport hierarchy should not be viewed as a mechanism to restrict the essential delivery of new and enhanced public transport infrastructure given the significant investment required to deliver these services and the resultant benefits.
2/SP7/8	Strategic Policies	TfL is pleased that the Mayor's Transport Strategy policies for mode shift away from the car (including the target for an 80% non-car mode share) and a restraint based approach to car parking for new development are now incorporated in Policy SP7	1	Transport for London	Noted.
2/SP7/9	Strategic Policies	TfL is pleased that part b (iv) has been strengthened and clarified for consistency with policy T4.	1	Transport for 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
2/SP7/10	Strategic Policies	TfL is pleased that additional references to safety, and accessibility have been included in part c as these are key Mayoral priorities	1	Transport for London	Noted.
2/SP7/11	Strategic Policies	Identify potential difficulty to achieve a minimum of 6b within the Old Oak area away from stations. Suggest re-wording text in P2 to 'achieve up to a PTAL of 6b'.	1	Transport for London	Change proposed. To reflect some locations away from public transport services in Old Oak North and South currently being shown as having Public Transport Accessibility Levels 6a, supporting text to P2 will be amended to seek to achieve a PTAL of 6b.
2/SP7/12	Strategic Policies	As well as Healthy Streets, Sport England's Active Design Principles should be embedded within the Local Plan	1	Sport England	No change proposed. OPDC considers that the 10 principles of Active Design are appropriately reflected within Local Plan policies.
2/SP7/13	Strategic Policies	There is conflict between providing access through Wormwood Scrubs and keeping the Scrubs as an untamed place	1	Wormwood Scrubs Charitable Trust	No change proposed. Policy P12 provides guidance to ensure the biodiversity value of Wormwood Scrubs is preserved and enhanced. The supporting text also recognises that Wormwood Scrubs' character as a publicly accessible open space that is more wild than tamed, will inform how the regeneration of Old Oak relates to 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
2/SP7/14	Strategic Policies	Should be connection 'to' the Scrubs, not 'into'.	1	Wormwood Scrubs Charitable Trust	Change proposed. To align with Policy P12, SP7 will be amended to state 'to Wormwood Scrubs'.
2/SP7/15	Strategic Policies	Welcomes connections from Old Oak Common Station and Old Oak South now exiting onto Wormwood Scrubs Street instead of Wormwood Scrubs.	1	Wormwood Scrubs Charitable Trust	Noted.
2/SP7/16	Strategic Policies	Amend supporting text to SP7 to rename Wormwood Scrubs Street to Wormwood Scrubs Lane and identify this is for walking and cycling only.	1	Wormwood Scrubs Charitable Trust	No change proposed. Although Wormwood Scrubs Street will be delivered after the plan period, OPDC considers the existing title to be appropriate. In recognition of the long-term delivery of this street, identifying it for walking and cycling only at this point in time is not considered to be appropriate.
2/SP7/17	Strategic Policies	Delivery of Hythe Road London Overground Station is not confirmed. Therefore, the increase in PTAL generated by the station cannot be used to justify high densities (and resultant building heights) in Old Oak North	2	Midland Terrace Residents Association, St Quintin and Woodlands Neighbourhood Forum	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.

Comment reference	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 policy supports the delivery of the highest public transport levels to support density of development.
2/SP7/18	Strategic Policies	Direct walking, cycling and bus links to Harlesden should be provided.	4	Alan Goodearl, King Wei Ling, Grand Union Alliance, John Cox	No change proposed. The Local Plan recognises the importance of connecting with surrounding areas, including Harlesden. Policies SP7, T6 and Place Policies P2, P8, P10 and P10 set out guidance to connect Harlesden through bus services, walking and cycling to Old Oak.
2/SP7/19	Strategic Policies	Policy should acknowledge importance of delivering a link between Willesden Junction and Old Oak North.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Policy P2 acknowledges the importance of delivering timely access to Willesden Junction to support access to public transport and support increased PTAL levels.
2/SP7/20	Strategic Policies	Paragraph should reference how the canal has evolved as an important nature and biodiversity corridor	1	London Borough of Hammersmith and Fulham	No change proposed. The roles of the Grand Union Canal are set out in Policy P3.
2/SP7/21	Strategic Policies	Supporting Mayor's Transport Strategy 80% target is incompatible with SIL of Park Royal	1	Aberdeen Standard Investments	No change proposed. OPDC considers that achieving the Mayor's aspirations is deliverable while supporting the functions of Park Royal. Transport policies within the Local Plan set out Park Royal specific guidance.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP7/22	Strategic Policies	Island approach to stations will not stimulate local economy.	1	Grand Union Alliance	No change proposed. Policy T5 provides guidance to ensure that they contribute to the creation of destinations, thereby helping to stimulate the local economy.
2/SP7/23	Strategic Policies	Large railway depots and other barriers should be relocated at the earliest opportunity	1	Grand Union Alliance	Noted. Policies SP10, P2 and P11 support the early delivery of development of depots subject to the continued delivery of transport functions.
2/SP7/24	Strategic Policies	Unique local transit system needed within the OPDC area.	1	Grand Union Alliance	No change proposed. The Old Oak Strategy Transport Strategy recommends the delivery of published transport networks. The use of potential future modes of transport are supported by SP7.
2/SP7/25	Strategic Policies	Better subsurface road infrastructure is needed.	1	West Acton Residents Association	No change proposed. OPDC considers that building subsurface road infrastructure is not an option due to the cost, the adverse impact upon the local and wider highway networks and need to support sustainable and active travel.
2/SP7/26	Strategic Policies	There has been no impact assessment for utilities and transport information for North Acton.	1	West Acton Residents Association	No change proposed. The Old Oak Strategy Transport Strategy undertook an impact assessment on the transport network of the OPDC and surrounding areas. OPDC's Utilities Strategy sets out the strategy for supporting development with required utilities infrastructure.

## 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
2/SP8/1	Strategic Policies	Requirement for delivering 30% of developable land as publicly accessible open space and deliver development capacity will be challenging.	1	Old Oak Park Limited	No change proposed. See response to comment EU1/6 from the first regulation 19 draft Local Plan.
2/SP8/2	Strategic Policies	There is currently a lack of secure, appropriate green space and play space within reasonable distance of some existing communities like Wells House Road as the Western end of Wormwood Scrubs suffer from anti social behaviour.	2	Thomas Dyton, Wells House Road Residents Association	<p>Noted. Policies SP8 and EU1 require development to conserve and enhance existing open spaces, and support the delivery of 30% publicly accessible open space in the developable area outside of SIL.</p> <p>Policy P12 (Wormwood Scrubs) sets out OPDC will seek to deliver sensitive enhancements and improved access to Wormwood Scrubs.</p>
2/SP8/3	Strategic Policies	Support policy, in particular conservation and enhancements of existing green infrastructure, but it should clarify that improved connections for green spaces are for spaces other than Wormwood Scrubs.	1	Wormwood Scrubs Charitable Trust	<p>Noted. Improving access to existing green spaces is an important element to the overall approach to green infrastructure.</p> <p>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</p>

Comment reference	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>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.</p> <p>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.</p>
2/SP8/4	Strategic Policies	On figure 3.13, Green corridors should be shown to the southern boundary of the scrubs, as per the walking and cycle maps elsewhere in the plan.	1	Wormwood Scrubs Charitable Trust	No change proposed. The urban greening corridors identified in figure 3.13 reflect new and existing routes through urban spaces and the need to incorporate urban greening measures within them.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP8/5	Strategic Policies	OPDC should take a natural capital accounting approach to development of the area, as promoted by the London Plan, London Environment Strategy and A Greener Future: The Governments 25 Environment Plan. This will to help capture the environmental challenges posed by the proposed density and population increases.	1	Environment Agency	No change proposed. Policy SP8 requires development to ensure an overall net gain in biodiversity. Further guidance on how OPDC expects development to achieve net gain will be provided through a future SPD, where references to the natural capital accounting approach may be appropriate.
2/SP8/6	Strategic Policies	A cross reference to Policy EU3 (Water) should be included in the supporting text.	1	London Borough of Hammersmith and Fulham	No change proposed. The supporting text states that green infrastructure relates to both green spaces and water spaces, and blue infrastructure is included in the definition of green infrastructure in the glossary.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP8/7	Strategic Policies	Wormwood Scrubs Park is a valuable London asset, but is isolated from much of the local population and is in a poor condition. A wider landscape plan is needed to improve the space and it's connections to surround areas and new development.	1	Grand Union Alliance	Noted. Policy P12 recognises that sensitive new walking and cycling connections to Wormwood Scrubs are required to improve access from surrounding communities, and ensure that it fulfils its function as a Metropolitan Park and it's requirements under the Act. The Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham are preparing a management plan for Wormwood Scrubs which will address deficiencies in access to the Scrubs, and inform a wider series of ecological and landscape enhancements.

#### 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
2/SP9/1	Strategic Policies	Empty homes across London should be made available before delivering high density development. Proposals are creating a two-tier society.	1	Anita Ringsell	No change proposed. Policy H5 seeks to work with relevant stakeholders to bring vacant residential properties back into use. Policy SP2 provides guidance to ensure the delivery of vibrant, mixed and inclusive lifetime neighbourhoods. Policy SP4 also seeks to deliver a range of housing tenures, types and sizes that deliver mixed and inclusive communities including an overarching 50% affordable housing target.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP9/2	Strategic Policies	<p>A buffer zone should be provided around low rise areas and existing open space, particularly at Old Oak Common Station. Station entrances should be moved to the centre of Old Oak and tall buildings focused in Old Oak North to minimise impact on surrounding communities.</p> <p>Residential above industrial uses in Park Royal should be delivered.</p>	1	West Acton Residents Association	<p>No change proposed. Policy SP9 provides guidance to ensure buildings respond appropriately to the setting of sensitive locations including heritage assets, open spaces, existing residential communities. 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.</p> <p>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. Detailed changes to the SIL boundary have been assessed in the Industrial Land Review Addendum.</p>
2/SP9/3	Strategic Policies	Policies do not provide adequate protection of existing neighbourhoods and conservation areas. Suggested amendments relate to protecting sensitive locations, protecting amenity, high standards of amenity and addressing crime.	25	Nye Jones, Gail Dobinson, Rachel Ritfeld, Ciara Solmi, Bernie Timmins, Thomas Dyton, Jane Dreaper, M. Szoke, James Trew, Eileen Hannington, Thomas Dyton, Marta Donaghey, Jamie Sutcliffe, TITRA, Pablo Navarrete, Jason Salkely, Elaine Gristock, David	No change proposed. The Local Plan provides a range of policies to protect the amenity of existing uses, communities, deliver a safe environment and conserve and enhance heritage assets. These include policies D2, D4, D6, D8, EU5, H7, TCC9, P8 and P9 alongside London 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
				Turner, Nicky Guymer, Pendle Harte, Wells House Road Residents Association, Oonagh Heron, Midland Terrace Residents, Grand Union Alliance, Wells House Road Residents Association	
2/SP9/4	Strategic Policies	Wells House Road and Midland Terrace should be conservation areas	2	Wells House Road Residents Association, Midland Terrace Residents	No change proposed. OPDC's Heritage Strategy undertook a comprehensive review of the historic significance of Wells House Road and Midland Terrace. This recommends that Wells House Road is identified as a Local Character Area. OPDC will be progressing heritage guidance for Wells House Road in due course. Midland Terrace is recognised as a historic residential enclave. Both are recognised as sensitive locations.
2/SP9/5	Strategic Policies	SP9 should refer to "heritage canalside warehouses"	1	Hammersmith Society	No change proposed. These warehouses are proposed to be identified as Buildings of Local Heritage Interest that will clarify their status as non-designated heritage assets. Non-designated heritage assets are referenced in policy SP9 and policy D8.
2/SP9/6	Strategic Policies	The OPDC area should give serious consideration to supporting cultural uses	1	Grand Union Alliance	Noted. Policies SP6 and TCC5 provide guidance to support the delivery of cultural 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
2/SP9/7	Strategic Policies	Supporting text and figure 3.15 should be amended to reference Kensal Green Cemetery as a Grade 1 Listed Registered Park and Garden.  A key view should be from the Round Pond in Kensington Gardens.	1	Royal Borough of Kensington and Chelsea	Change proposed. The key to Figure 3.15 will be amended to label Kensal Green Cemetery Grade 1 Listed Registered Park and Garden.  No change proposed. Para 3.73 provides reference to Kensal Green Cemetery Grade 1 Listed Registered Park and Garden.  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.
2/SP9/8	Strategic Policies	Support for Figure 3.15	1	Osbourne Investments Limited and Quattro Holdings Limited	Noted.
2/SP9/9	Strategic Policies	Boden House should be identified as a star as a location appropriate for a tall building.	1	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. Boden House and surrounding land is identified on Figure 3.15 as an area where tall buildings are an appropriate form of development in principle. Specific locations where tall buildings are an appropriate form of development in principle, and illustrated by a star, are those that benefit from further analysis for suitability of tall buildings and/or planning permissions 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
2/SP9/10	Strategic Policies	Elizabeth Line should be removed from the area where tall buildings are an appropriate form of development as it will be delivered outside of the plan period.	1	Transport for London	No change proposed. The supporting text to Policy P1 supports early delivery of the Elizabeth Line Depot. OPDC considers it appropriate to provide guidance for the depot should this be achieved.
2/SP9/11	Strategic Policies	Social infrastructure and housing needs of migrants cannot be met. Empty homes should be brought back into use. Green belt should be built on. Inequalities will increase.	1	Anita Ringsell	No change proposed. OPDC's Local Plan's guidance for delivering a range of homes and social infrastructure is supported by the Strategic Housing Market Assessment and the Social Infrastructure Needs Study. Policy H5 sets out guidance for bringing empty homes back into use. It is not the role of the Local Plan to provide guidance for development on Green Belt. The Local Plan's Integrated Impact Assessment includes an Equalities Impact Assessment which identifies benefits from the development.
2/SP9/12	Strategic Policies	Delivery of Hythe Road London Overground Station is not confirmed. Therefore, the increase in PTAL generated by the station cannot be used to justify high densities (and resultant building heights) in Old Oak North	2	The Hammersmith Society, Old Oak Neighbourhood Forum	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP9/13	Strategic Policies	Supporting text should reinstate wording: "Any proposal for a tall building would need to accord with the requirements of OPDC's tall buildings policy (PolicyD5). Proposals would also need to assess their impact on key views identified in OPDC's Views Study, as required by Policy D7 (Key Views)"	1	The Friends of Wormwood Scrubs	No change proposed. The National Planning Practice Guidance states that Local Plans should avoid undue repetition. It is considered that repeating the requirements of policies D5 and D7 would result in unwarranted repetition.
2/SP9/14	Strategic Policies	Support for the definition of proposed location of tall buildings.	1	Canal & River Trust	Noted.
2/SP9/15	Strategic Policies	<p>Tall Buildings Statement is inadequate, based on future PTAL assumptions and does not provide information for anticipated building heights. The Draft New London Plan will unlikely be adopted before the OPDC Local Plan examination. Therefore the Local Plan's approach to tall buildings should be assessed against existing London Plan policies.</p> <p>Query the approach to not identifying general tall building heights.</p> <p>Information used to define tall</p>	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	No change proposed. The methodology for defining a tall building within the OPDC area is set out in OPDC's Tall Building Statement. This meets the requirements of Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. This is based on a review of Local Plan supporting studies, precedent schemes and OPDC permitted schemes. This review defines an average range of shoulder heights appropriate for the OPDC area of 8 to 12 storeys. The Draft New London Plan requires tall building definitions to relate to the evolving context. To recognise the evolving context of Old Oak and Park Royal as a high density area a range is considered to be appropriate to inform the tall building definition. The definition also makes an assumption to address site specific circumstances before reaching a height to be defined as a tall building. Site specific circumstances may include a site with a complex geometry or the need to respond to in-situ retained

Comment reference	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 does not include density information and does not include height information for tower elements of precedents.			<p>existing infrastructure. Buildings heights are provided in place policies where these are supported by evidence base. OPDC considers the evidence based and pragmatic approach informed by Local Plan supporting studies, precedents, permitted schemes and an assumption to recognise the area's evolving context to be justified and appropriate for the role of a Local Plan. It is in general conformity with the existing and Draft New London Plan.</p> <p>No change proposed. Identifying general heights of tall buildings is not considered to be appropriate at this time. This is due to the evolving context of the OPDC area as an Opportunity Area and recognising the area-specific complex circumstances in planning and delivering priorities for affordable housing, commercial uses, local and nationally significant infrastructure, new street networks, high standards of sustainability, securing deliverability of development and addressing multifaceted challenges. However, where appropriate within the Local Plan place policies, general shoulder and/or podium heights are defined based on recommendations by supporting studies. As further supporting studies are developed and challenges are resolved, OPDC will provide guidance for general heights of tall buildings in future versions of the Local Plan and in forthcoming Supplementary Planning Documents. As further supporting studies are developed and challenges are resolved, OPDC will provide guidance for general heights of tall buildings in future versions of the Local Plan and in forthcoming Supplementary Planning Documents.</p> <p>No change proposed. Density information for this information is set out in OPDC's Development Capacity</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Study. The approach to defining a tall building within the OPDC area is based on heights above a range of shoulder and/or podium heights. As such the height of tower elements of precedents was not considered to be required for the purpose of establishing a definition of tall buildings.
2/SP9/16	Strategic Policies	Tall buildings are not justified, particularly with regard to the impact of tall buildings on surrounding communities.	3	Thomas Dyton, Wells House Road Residents Association, Anita Ringsell	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. Policies D6 and P8 provide guidance to ensure new development does not cause unacceptable harm to the amenity of existing uses.
2/SP9/17	Strategic Policies	Tall buildings should be located in Old Oak North to decrease impact on existing communities	2	Thomas Dyton, Wells House Road Residents Association	No change proposed. Policy SP9 provides guidance to ensure buildings respond appropriately to the setting of sensitive locations including heritage assets, open spaces, existing residential communities. 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.
2/SP9/18	Strategic Policies	Definition of a tall building should consider a contextual and characterisation approach,	1	Historic England	No change proposed. The methodology has considered the local context and character by considering the recommendations of supporting studies which respond 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
		as advocated by Draft New London Plan Policy D8. This also reflects Historic England's response to the Draft New London Plan.			the local context. Draft New London Plan paragraph 3.8.2 also requires that in large areas of extensive change, such as Opportunity Areas, definitions of tall buildings should relate to the evolving context. This requirement has been used in the Tall Building Statement methodology for defining the height of a tall building in the OPDC area.
2/SP9/19	Strategic Policies	The delivery of a new built form typology for high density development with towers has not been acknowledged.	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	No change proposed. The Old Oak North Development Framework Principles supporting study recognises the delivery of a new typology and illustrates this with an indicative massing of a development proposal in Old Oak North. This level of detail is considered appropriate for inclusion in the forthcoming Old Oak North and Scrubs Lane Supplementary Planning Document.
2/SP9/20	Strategic Policies	Figure 3.15 should mark all specific locations where tall buildings would be acceptable, including Oaklands.	1	London Borough of Hammersmith and Fulham	No change proposed. Figure 3.15 identifies all areas and specific locations where tall buildings would be an appropriate form of development in principle based on the methodology set out in the Tall Buildings Statement. Oaklands is located within an area where tall buildings would be an appropriate form of development in principle.
2/SP9/21	Strategic Policies	SP9 should set out further detailed guidance for assessing the benefits of appropriateness of tall buildings. SP9 b) should include: "Tall buildings need to be assessed on their own merits to avoid harm and protect and enhance identified sensitive	1	Grand Union Alliance	No change proposed. Other policies in the London Plan and Local Plan provide this guidance. Relevant Local Plan policies include D4, D5, D6 and D8 and 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
		locations and accord with all other relevant policies within OPDC's Local Plan."			
2/SP9/22	Strategic Policies	The proposed green space between Wells House Road and Old Oak Common Station by HS2 should be delivered.	2	Thomas Dyton, Wells House Road Residents Association	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.
2/SP9/23	Strategic Policies	OPDC does not have a commitment to design quality.	2	Thomas Dyton, Wells House Road Residents Association	No change proposed. 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. These include SP2, SP9, D1, D2, D4 and D5.
2/SP9/24	Strategic Policies	Para 3.71 is unclear and should read "High design quality is sought for a broad range of building typologies, and can be subjective....."	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the existing text to be sufficiently clear.
2/SP9/25	Strategic Policies	Design quality of North Acton's recent development is of poor quality. OPDC must take responsibility of North Acton.	1	Old Oak Neighbourhood Forum	Noted. OPDC has a scheme of delegation with the London Borough of Ealing. All planning applications will be determined by LB Ealing using OPDC's Local Plan. Local Plan policies SP2, SP9, D2 and P7 provide guidance to delivery new high quality public realm and improve the existing public realm of North Acton.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SP9/26	Strategic Policies	Figure 3.15 shows locations previously identified as sensitive locations as being locations appropriate for tall buildings in principle.	1	Grand Union Alliance	No change proposed. Figure 3.15 was amended from the first Regulation 19 Local Plan to remove proposed Locally Listed assets reflecting their proposed status. Should these be adopted by OPDC prior to the Independent Examination, their depiction in Figure 3.15 will be proposed as a minor modification. Subject to the Planning Inspector's decision, these assets will be shown alongside the areas and specific locations where tall buildings are an appropriate form of development in principle. These will be managed by Local Plan Policy D8 and other relevant material considerations.
2/SP9/26	Strategic Policies / Design	The Local Plan lacks of clear and transparent information for building heights.	26	Thomas Dyton, Wells House Road Residents Association, Stephanie Hewett, Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum, Gail Dobinson, Rachel Ritfeld, Ciara Solmi, Bernie Timmins, Jane Dreaper, M. Szoke, James Trew, Eileen Hannington, Marta Donaghey,	No change proposed. The definition of a tall building for the OPDC area is defined in Policies SP9, D5, the Local Plan glossary and the Tall Buildings Statement supporting study. This is 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. 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 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, flexibility is required to reflect the evolving context, site specific requirements and the longer term phasing of development. OPDC considers this level of detail for building heights to be appropriate for the role of a Local Plan and to be consistent with the NPPF's (2012)

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Jamie Sutcliffe, TITRA, Pablo Navarrete, Jason Salkely, David Turner, Nicky Guymer, Nye Jones, Natasha Salkey, Elaine Gristock, Mark Walker, St. Quintin and Woodlands Neighbourhood Forum, The Hammersmith Society	<p>requirement for clarity. It is also in general conformity with the existing and Draft New London Plan.</p> <p>Buildings heights are provided in place policies where these are supported by evidence base.</p>

#### 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
2/SP10/1	Strategic Policies	Consideration needs to be given to providing infrastructure to support tall buildings.	1	Anita Ringsell	No change proposed. The requirement for the provision of infrastructure at a rate and scale sufficient to support all development is set out in Policy SP10.
2/SP10/2	Strategic Policies	Welcome the clarification provided in relation to the way in which the equalization mechanism for infrastructure will operate.	1	Old Oak Park Limited	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
2/SP10/3	Strategic Policies	Welcome that Local Plan has been amended to reflect that no housing units or commercial floor space could be delivered at the Elizabeth Line Depot within the plan period but should be identified for delivery in the longer term beyond the plan period.	1	Transport for London	Noted.
2/SP10/4	Strategic Policies	The EMR site is capable of greater and earlier delivery of new homes and other development than is suggested.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Housing capacity of site allocations are defined as minimums within table 3.1. SP10 supports the early delivery of development.
2/SP10/5	Strategic Policies	Recommend that OPDC revises its proposals for Victoria and Westway industrial estate.	1	SEGRO	No change proposed. Housing capacity of site allocations are defined as minimums within table 3.1.
2/SP10/6	Strategic Policies	Support the introduction of site allocations in Park Royal.	1	SEGRO	Noted.
2/SP10/7	Strategic Policies	This draft Local Plan provides numerical site allocations which are or may not be sound estimations of optimum capacity and phasing and no justification is given for the revisions. There is no qualitative guidance on place ambitions and proposals. The policy wording, stated vision, and adjoining spatial key	1	Grand Union Alliance	No change proposed. The Second Regulation 19 Revised Draft Local Plan tracked change version provides an overview of the specific and first Regulation 19 consultation amendments. The amendment relating to the whole of table 3.1 makes reference to the updated capacity and phasing being based on the updated Development Capacity Study. The Development Capacity Study has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		diagrams are inconsistent and whole Plan is unsound.			<p>Availability Assessments. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Park Royal 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. It also includes updated development management information.</p> <p>No change proposed. OPDC considers the Local Plan to be sound. The content of the Local Plan has been developed to be consistent between each policy regardless of location or spatial scale.</p> <p>No change proposed. Qualitative guidance for each place appropriate to the role of a Local Plan, including areas of the major town centre, is provided within the Place Policies.</p>

## ***Places Chapter***

### **Policy P1- Old Oak South**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/P1/1	Places	P1(d) and paragraph OOS.5. should be amended to identify B1 uses, rather than B1a.	1	Imperial College	Change proposed. The reference to B1a in Policy P1(d) uses reflects the proximity to the Old Oak Common Station where office floorspace is identified to be appropriate to optimise development and job densities. This is set out in OPDC's Future Employment Growth Sectors Study. Policy P2 Old Oak North supports a range of employment uses, including B1 uses.
2/P1/2	Places	The description of the bridge from Old Oak South to Wormwood Scrubs has been changed from Green Bridge to Bridge. Location of this bridge is important. The plan does not justify its location.	1	The Friends of Wormwood Scrubs	No change proposed. The change in description reflects the level of detail considered appropriate for a Local Plan. The location responds to recommendations set out in the Old Oak North Development Framework Principles based on an assessment of delivering optimum connections. The detailed design and location of this walking and cycling connection will be subject to future analysis in consultation with relevant stakeholders including the Wormwood Scrubs Charitable Trust.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P1/3	Places	Policies within the Local Plan identify that delivery of Wormwood Scrubs Street will be after the plan period and after the opening of Old Oak Common Station. The need for a long term connection from the station to Wormwood Scrubs Street is not justified. Figures show access points to the north of Wormwood Scrubs Street	3	The Friends of Wormwood Scrubs, The Hammersmith Society, John Cox	No change proposed. Supporting text to Policy P1 recognises that delivery of Wormwood Scrubs Street and development on the IEP Depot will take place after the plan period. The supporting text also recognises that early development of these sites will be supported. OPDC considers it appropriate to provide guidance for the depot should this be achieved.
2/P1/4	Places	Continued concerns regarding access from Old Oak Common Station to Wormwood Scrubs. Passengers of train services will not require access to Wormwood Scrubs from the station. Access should be moved to the east/centre of the site.	3	The Friends of Wormwood Scrubs, Thomas Dyton, Wells House Road Residents Association	Noted. 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.

Comment reference	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 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.
2/P1/5	Places	The proposed green space between Wells House Road and Old Oak Common Station by HS2 should be delivered.	2	Thomas Dyton, Wells House Road Residents Association	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.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P1/6	Places	Guidance for vehicular access and accessibility is unclear.	1	Grand Union Alliance	No change proposed. The level of detail provided in Policy P1 for defining movement networks is appropriate for the role of a Local Plan. Policy D3 provides guidance to deliver an inclusive and accessible built environment for all sections of the community. The Old Oak North Development Framework Principles supporting study has undertaken a robust assessment of delivering a movement network at 1:20 gradient or better. Further detailed guidance will be provided in the forthcoming Old Oak North and Scrubs Lane SPD.
2/P1/7	Places	The Local Plan should provide a firmer commitment to delivering Wormwood Scrubs Street to Kensal Canalside in the plan period.	1	Royal Borough of Kensington and Chelsea	No change proposed. Wormwood Scrubs Street is currently identified to be delivered after the plan period. Figure 4.2 shows the key route of Wormwood Scrubs Street towards Kensal Canalside as a potential connection reflecting the level of work undertaken in defining its delivery. Following the completion of any future work demonstrating this connection, future versions of the Local Plan would reflect this accordingly.
2/P1/8	Places	Proposed designation of Old Oak major town centre is appropriate.	1	Royal Borough of Kensington and Chelsea	Noted.
2/P1/9	Places	Welcome delay in phasing of development of the Elizabeth Line Depot	2	Transport for London Commercial Development, Transport for 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
2/P1/10	Places	Policies should ensure sites adjacent to the Elizabeth Line Depot support its development.	1	Transport for London	No change proposed. Policy SP10 provides guidance for all development to be coordinated and does not unduly restrict development on adjacent and connected sites.
2/P1/11	Places	Support activation of frontages of the Elizabeth Line Depot but these need to support operational needs of the depot.	1	Transport for London	Noted. The Agent of Change principle set out in Policy D6 and Draft New London Plan Policy D12 would be implemented to support the operational needs of the depot.
2/P1/12	Places	Maps should show a buffer zone for lower building heights of 6-8 storeys facing on to Wormwood Scrubs.	1	Wormwood Scrubs Charitable Trust	No change proposed. Policy SP9 identifies Wormwood Scrubs, being an open space, as a sensitive location. The Local Plan figure 3.15 map shows sensitive locations and areas where tall buildings are "an appropriate form of development in principle". SP9 requires development to respond appropriately to these sensitive locations. This is considered to be appropriate for the context of Wormwood Scrubs given its functions and its proximity to Old Oak Common Station. This also recognises that development along the north of Wormwood Scrubs is currently envisaged to be delivered beyond the Local Plan period (2018-2038).
2/P1/13	Places	The proposed character of Wormwood Scrubs Street should be provided.	1	Wormwood Scrubs Charitable Trust	No change proposed. Wormwood Scrubs Street is currently identified to be delivered after the plan period. Due to the street's long-term delivery, it is not considered appropriate to define the character of the street. This will be subject to further detailed 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
2/P1/14	Places	Commencement of development of Oaklands development should be referenced in the supporting text.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. The Development Capacity Study and Policy SP10 identifies that Oaklands will be delivered within the first 5 years of the plan period. It is not considered appropriate for the Local Plan to refer to the commencement of development.
2/P1/15	Places	Delay in development of Elizabeth Line Depot will impact on placemaking and delivery of a commercial centre in Old Oak South.	1	London Borough of Hammersmith and Fulham	No change proposed. The development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan reflecting updated availability information provided by landowners. Policy P1 continues to seek to deliver a commercial centre. 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. Policies SP7, P1 and P2 provide guidance to deliver Old Oak Street to connect Old Oak Common Station with surrounding areas. To support placemaking Policy P1 supports activation of the frontages of the depot and delivery of meanwhile uses.
2/P1/16	Places	Support reference to delivering Local Parks. Other publicly accessible open spaces should also be referenced.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy SP8 and supporting text to Policy P1 refer to a range of publicly accessible open spaces as part of the green infrastructure network.
2/P1/17	Places	P1 should clarify that direct access to Wormwood Scrubs will not be provided. Technology could assist people viewing nature on Wormwood Scrubs	1	Wormwood Scrubs Charitable Trust	Noted. 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

Comment reference	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>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.</p> <p>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.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P1/18	Places	Publicly accessible open spaces should include green infrastructure. Benefits of green infrastructure should be stated. Management plans should be agreed with the boroughs.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy SP2 sets out the benefits of green infrastructure. Policy EU2 sets out guidance to deliver urban greening. Supporting text to EU1 refers to the need for consultation with the relevant local authority on all management and maintenance arrangements for publicly accessible open spaces that they may adopt in the future.
2/P1/19	Places	Requirements for sports infrastructure should be referenced in Place Policies.	1	Sport England	No change proposed. Sport facilities are identified as social infrastructure within the Local Plan. SP4 provides strategic guidance to deliver sport facilities to meet the requirements of the development. Due to the long term development phasing and the need to ensure the Local Plan can respond to changing needs over the lifetime of the plan, the Infrastructure Delivery Plan sets out the detailed requirements for sports infrastructure. However, to provide transparency regarding currently identified need for sports facilities, supporting text to Place policies P1 and P2 provide information relating to the delivery of sports infrastructure.

#### Policy P1C1- Old Oak Common 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
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2/PC1C1/1	Places	Old Oak Common Station is being designated to accommodate forecast Rail plan Scenario 28 passenger demands. Any changes to this would require instruction from DfT and additional funding. Town centre uses within and around the station will be delivered in accordance with the High Speed Rail Act 2017.	1	HS2 Ltd.	Noted. TfL modelling information has been provided in paragraph OOC.7 to illustrate interchange with other modes. Policy P1C1 confirms OPDC will work positively with stakeholders to deliver Old Oak Common Station in accordance with the High Speed Rail Act.
2/PC1C1/2	Places	A 24 hour east west route across the station will be considered. The station will not be accessible 24 hours a day.	1	HS2 Ltd.	Noted. Policy P1C1 provides guidance for 24 hour public routes through the station. These will be delivered in accordance with the High Speed Rail Act 2017.
2/PC1C1/3	Places	Support for high density development. Policy should be clear in optimising housing delivery at stations.	1	Transport for London Commercial Development	Noted. Policy P1C1 provides guidance focused on Old Oak Common Station. Policy P1 provides guidance for wider Old Oak South, including development plots adjacent to the station. This seeks to create a high density place with substantial quantum's of residential and commercial development. Supporting text to Policy SP9 identifies that in locations of high public transport accessibility, high densities are appropriate. Policy SP10 seeks to optimise development. OPDC considers these policies to accord with the aspirations of the Draft New London Plan to optimise development.
2/PC1C1/4	Places	Policy should be amended to acknowledge the importance of bus services.	1	Transport for London	No change proposed. The need to deliver a high quality bus network is acknowledged in Policy T6. Policy P1C1 and supporting text make reference to the need to deliver transport interchange facilities which would include bus services.

2/PC1C1/5	Places	Welcome reference to green infrastructure	1	London Borough of Hammersmith and Fulham	Noted.
2/PC1C1/6	Places	Old Oak Common Station should pioneer smart city concepts.	1	London Borough of Hammersmith and Fulham	Noted. Policy T4 provides guidance to ensure all stations future proof station designed to facilitate future technological changes.

#### 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
2/P2/1	Places	Figure 4.7 should show Old Oak Street connecting to Willesden Junction Station.	1	London Borough of Brent	Change proposed. Figure 3.10 depicts Old Oak Street connecting to Willesden Junction Station. Figure 4.7 seeks to show the continuation of Old Oak Street north of Park Road as a walking and cycling route due to the complexities in delivering this key route for all modes. This is also referenced in paragraph OON.14. To assist in clarifying the continuation of Old Oak Street as a walking and cycling route to Willesden Junction, Figure 4.7 and other relevant diagrams will be amended to show Old Oak Street as a walking and cycling route more clearly.
2/P2/2	Places	The role of Harlesden Place should be clarified.	1	London Borough of Brent	No change proposed. The role of Harlesden Place as part of the Old Oak North Local Park is set out in paragraph OON.10 at a level of detail appropriate to a Local Plan. Further guidance on its role will be set out in the future Old Oak North and Scrubs Lane SPD based on recommendations in the Old Oak North Development Framework Principles supporting 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
2/P2/3	Places	Seek clarification on the definition of a Mixed Use Area (in the east) and how this differs from a Major Town Centre (in the west) in Old Oak North. Also encourage recognition of the potential for a station at Hythe Road to contribute towards the Major Town Centre, and flexibility on the application of these designations within Old Oak North.	1	Old Oak Park Limited	<p>Noted. The mixed use reference relates to a range of uses including residential, town centre, employment and social infrastructure. This includes the major town centre proposed for Old Oak North and South. Guidance for these areas are set out in SP5, SP6 and TCC1.</p> <p>Change proposed. Paragraph OON.6 will be amended to make reference to the potential Hythe Road Station contributing to the vibrancy of Old Oak major town centre.</p>
2/P2/4	Places	Strong opposition to the safeguarding and expansion of Old Oak Sidings (Powerday) waste management facility due to the existing and potential negative impact on local amenity. Request alternative waste management site to be found.	28	TITRA, Nye Jones, Gail Dobinson, Catherine Goodall, Rachel Ritfeld, Ciara Solmi, Bruce Stevenson, Eileen Walsh, Teresa De La Rosa, Oonagh Heron, Bernie Timmins, Thomas Dyton, Jane Dreaper, M. Szoke, James Trew, Stephanie Hewett, Eileen	<p>Noted. The Mayor's London Plan requires Local Plans to identify land/facilities to meet waste apportionment targets, and expects this to include protecting and facilitating the maximum use of existing waste sites. Powerday is required to meet LBHF's waste apportionment targets and therefore it will continue to be protected as a waste management 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.</p> <p>A range of policies within the Local Plan and London Plan will be implemented to ensure that new development would not cause unacceptable harm to the amenity of</p>



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Hannington, Alison Brayshaw, Marta Donaghey, Jamie Sutcliffe, Pablo Navarrete, Stuart McCaffer, Pendle Harte, Jason alkely, Elaine Gristock, David Turner, Nicky Guymer, Environment Agency, Midland Terrace Residents	existing uses. The Local Plan policies include SP9, D6, EU4, EU5, EU6, P2 and P8.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P2/5	Places	Figure 4.7 and Policy P2 are inconsistent regarding the route of Old Oak Street. Harlesden Place is not recognised within the green infrastructure section of Policy P2.	1	London Borough of Brent	<p>Change proposed. Supporting text to Policy P1 identifies that Old Oak Street crosses Harlesden Place to Willesden Junction Station as a walking and cycling route. To ensure figure 4.7 reflects information provided in the supporting text to policy P1, the walking and cycling route will be labelled as Old Oak Street.</p> <p>No change proposed. Harlesden Place and Oak Park comprise the Old Oak North Local Park which is labelled in figure 4.7. Policy P2 provides guidance for Old Oak North Local Park. Further detail for Harlesden Place is provided in the Old Oak North Development Framework Principles document which will inform the forthcoming Old Oak North and Scrubs Lane SPD.</p>
2/P2/6	Places	Minimum development quantum have been reduced. Site is considered to have additional development capacity.	1	Old Oak Park Limited	Noted. Table 3.1 identifies that housing and commercial floorspace targets are minimums.
2/P2/7	Places	Concern expressed regarding location and alignment of some roads, amount of open space and relationship between development plots and the embankment within the Old Oak North Development Framework Principles.	1	Old Oak Park Limited	Noted. The Local Plan illustrates indicative locations of streets, Local Parks and position of the proposed West London Line viaduct. The forthcoming Old Oak North and Scrubs Lane SPD will provide further detailed indicative guidance for the location of these elements.
2/P2/8	Places	Support for viaduct option	1	Old Oak Park Limited	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
2/P2/9	Places	Guidance for the location of B1c uses along the Haul Road is too detailed.	1	Old Oak Park Limited	No change proposed. The Old Oak North Development Framework Principles has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. This identifies that the Haul Road is appropriate for B1c uses reflecting it's transport role and access to the wider movement network.
2/P2/10	Places	Delivering 30% publicly accessible open space is a challenge.	1	Old Oak Park Limited	No change proposed. 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. 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 amount of time people spend in parks, helps to improve healthy outcomes and can contribute to better air quality, SuDS, and quality of place.
2/P2/11	Places	Removal of location specific guidance for family and smaller housing is not supported. Text should be reinserted.	2	John Cox, Grand Union Alliance	No change proposed. The removal of this guidance is considered to be appropriate to provide flexibility for location of different residential unit sizes. Policy H3 provides guidance for the range of home sizes to be provided.
2/P2/12	Places	Walking and cycling route across Old Oak North Local Park must be safe. Exact boundary of the Old Oak North Local Park is unclear.	2	John Cox, Grand Union Alliance	Noted. Policy D2 provides guidance to deliver a safe and secure public realm. Noted. Local Plan Appendix identifies that figures in the Local Plan are indicative. It is not the role of the Local Plan to define the exact boundary of the Old Oak North Local 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
2/P2/13	Places	Old Oak Street should be renamed reflecting its route. Station Approach does not need renaming.	1	John Cox	Noted. Old Oak Street has been named for the purposes of the Local Plan. In the long-term development of the area, other names will be considered. Station Approach is not proposed to be renamed.
2/P2/14	Places	The London Environment Strategy states that Energy from Waste facilities are not required to manage municipal waste. The Local Plan should clarify its policy on Energy from Waste.	1	Mayor of London	<p>Noted. 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 a 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 policy does not identify potential waste streams which is considered to provide appropriate flexibility to be in general conformity with the London Plan and to be consistent with the latest approach set out in the London Environment Strategy regarding the use of municipal waste for Energy from Waste facilities.</p> <p>A range of policies within the Local Plan and London Plan will be implemented to ensure that new development, including facilities for a decentralised energy network, would not cause unacceptable harm to the amenity of existing uses. The Local Plan policies include SP9, D6, EU4, EU5, EU6, P2 and P8.</p>
2/P2/15	Places	P2 should refer to "heritage canalside warehouses"	1	Hammersmith Society	No change proposed. These warehouses are proposed to be identified as Buildings of Local Heritage Interest that will clarify their status as non-designated heritage assets. Non-designated heritage assets are referenced in policy SP9 and policy D8.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P2/16	Places	Support for delivery of the potential Hythe Road Station and West London Line viaduct.	1	Transport for London	Noted.
2/P2/17	Places	Further work will be required to develop the design of the potential Hythe Road Station. This will require engagement between OPDC, TfL and stakeholders.	1	Transport for London	Noted. The Local Plan provides strategic guidance for the design of stations. This will be implemented in the detailed design of stations in consultation with relevant stakeholders.
2/P2/18	Places	Supporting text to Policy P2 should set out that if Hythe Road Station is not delivered, alternative approaches to delivering public transport improvements will be sought.	1	Transport for London	No change proposed. Policy P2(g) provides guidance to achieve the highest PTAL to support high density development. Paragraph OON.12 provides information in relation to delivering a range of public transport services to deliver high PTAL levels.
2/P2/19	Places	Support for Park Road being delivered as access only.	1	Transport for 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
2/P2/20	Places	Delivery of Hythe Road London Overground Station is not confirmed. This is required to support densities and the need of development.	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	<p>Noted. TfL supports the preferred option of a viaduct and potential new station at Hythe Road. The benefits of this solution have been demonstrated through TfL's business case work and the public consultation carried out in autumn 2017 showed significant public support for the proposals. The Overground station at Old Hythe Road is planned to be delivered by 2026 to coincide with the opening of Old Oak Common station. OPDC is currently working with partners including HS2, Network Rail and TfL to confirm a funding package for the station.</p> <p>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. 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 provided by Hythe Road Station. The policy supports the delivery of the highest public transport levels to support density of development.</p>
2/P2/21	Places	Removal of requirements for green infrastructure along streets and minimising impacts on sewer network weakens the policy.	1	Environment Agency	No change proposed. The National Planning Practice Guidance states that Local Plans should avoid undue repetition. These components were removed to avoid repetition with policies EU2 and EU3.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P2/22	Places	Policy should emphasise that the provision of a new bridge link between the Station and the regeneration area to the south, landing in the European Metals Recycling (EMR) site, will improve PTAL.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. The supporting text to Policy P2 adequately sets out the benefits of a bridge link to Willesden Junction to PTAL.
2/P2/23	Places	Publicly accessible open spaces should include green infrastructure. Benefits of green infrastructure should be stated. Management plans should be agreed with the boroughs.	1	London Borough of Hammersmith and Fulham	Noted. Policy SP2 sets out the benefits of green infrastructure. Policy EU2 sets out guidance to deliver urban greening. Supporting text to EU1 refers to the need for consultation with the relevant local authority on all management and maintenance arrangements for publicly accessible open spaces that they may adopt in the future.
2/P2/24	Places	Welcome support of new multifunctional waterspaces	1	London Borough of Hammersmith and Fulham	Noted.
2/P2/25	Places	Policy P2 should be amended to address amenity issues.	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance to design development to address pollution and urban heat island effects are set out in policies EU1, EU2 and EU4.
2/P2/26	Places	Policy should provide reference to Policy D7.	1	London Borough of Hammersmith and Fulham	No change proposed. All relevant policies in the Local Plan will be used to determine proposals. As such, a specific reference to policy D7 is not required.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P2/27	Places	Supporting text to P2 should refer to nursery provision rather than one super nursery. This should also apply to policies P1 and TCC4.	1	London Borough of Hammersmith and Fulham	No change proposed. The need for supernurseries is based on a robust assessment of need. The typology is consider to be the most efficient and viable based on existing information and discussions with operators. Should market conditions change, future versions of the Local Plan will be updated.
2/P2/28	Places	Hythe Road Station should be referred to as proposed rather than potential.	1	London Borough of Hammersmith and Fulham	No change proposed. The term potential is considered to be appropriate to reflect the current status of proposals for the station.
2/P2/29	Places	The Grand Union Canal Food and Beverage Quarter should be restricted to clusters of activity along the canal.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy P3 seeks to activate the Grand Union Canal. Therefore, restricting the Food and Beverage Quarter to clusters of activity is not considered to be appropriate.
2/P2/30	Places	Support safeguarding of Old Oak Sidings waste facility	1	London Borough of Hammersmith and Fulham	Noted.
2/P2/31	Places	Policy P2 does not reference the need for compensatory provision, set out policy EU6, for the waste capacity of the EMR site.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU6 would be implemented to manage the loss of the waste function on the EMR site.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P2/32	Places	Building heights are overwhelming.	1	Grand Union Alliance	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. Policies D6 and P8 provide guidance to ensure new development does not cause unacceptable harm to the amenity of existing uses.
2/P2/33	Places	Buildings around Local Parks may negatively impact their amenity.	1	Grand Union Alliance	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. Policies EU1 and D6 provide guidance to ensure the delivery of appropriate standards of amenity for publicly accessible open spaces.
2/P2/34	Places	The Local Plan does not provide adequate connections to Harlesden town centre.	1	Grand Union Alliance	No change proposed. The Local Plan recognises the importance of connecting with surrounding areas, including Harlesden. Policies SP7, T6 and Place Policies P2, P8, P10 and P10 set out guidance to connect Harlesden through bus services, walking and cycling to 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
2/P2/35	Places	Delivering Park Road as access only will increase traffic in Harlesden. A new vehicular route is required. Delay of development of Elizabeth Line Depot does not result in legible connections to Old Oak North. Impacts on the wider movement network have not been considered.	3	Grand Union Alliance, Diocese of London, Harlesden Neighbourhood Forum	<p>No change proposed. Park Road is identified to be appropriate for all modes of transport aside from private vehicles. This includes taxis and bus services. The Old Oak Strategic Transport Study and Park Royal Transport Strategy have assessed the impacts of development which can be mitigated through a range of highways and policy interventions. Policy T1 provides guidance to ensure that the impacts on the surrounding local and strategic road network are mitigated.</p> <p>No change proposed. The Old Oak North Development Framework Principles has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. The consultants undertook a robust assessment of the technical constraints of Old Oak North, Willesden Junction and the required retention of the Elizabeth Line Depot to identify deliverable connections to surrounding areas. This work has shown that delivering an all modes route north of Park Road to Harlesden is very challenging at the time of the publication of the Local Plan. Therefore the Local Plan proposes it to be a high quality walking and cycling route to ensure a strong connection to Harlesden. The work has also successfully demonstrated that Old Oak Street as a legible connection can be delivered with a retained depot to connect Old Oak North and Old Oak South. To support placemaking Policy P1 supports activation of the frontages of the depot and delivery of meanwhile uses.</p>
2/P2/36	Places	Warehousing adjacent to the Rolls Royce Building would be retained for active uses.	1	Grand Union Alliance	Noted. Conservation and enhancement of this proposed non-designated asset will be considered in accordance with Policy D8 and other relevant policies and material considerations.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P2/37	Places	Removal of Policy P2C1 is not supported	2	John Cox, Grand Union Alliance	No change proposed. The removal of P2C1 has been carried out to reflect the change in character resulting from relocation of Old Oak Street away from Grand Union Square and avoid repetition with policies elsewhere in the plan.
2/P2/38	Places	Removal of Policy P2C1 is supported	1	Old Oak Park Limited	Noted.

#### Policy P3- 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
2/P3/1	Places	Support recognition of the role of the Grand Union Canal.	3	Canal & River Trust, The Inland Waterways Association, Regents Network	Noted.
2/P3/2	Places	Support for Policy P3	1	Canal & River Trust	Noted.
2/P3/3	Places	P3 Vision should make reference to the canal's role within the community and health and well being.	2	Canal & River Trust, The Inland Waterways Association	Change proposed. P3 Vision will be amended to make reference to the canal as a community asset.
2/P3/4	Places	Concern that uniform building heights of 6-8 storeys along the	1	Canal & River Trust	Noted. Please refer to response P3/6 made to the First Regulation 19 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
		canal will have a negative impact on amenity.			
2/P3/5	Places	Previous comments regarding stronger design guidance for bridges still stand.	1	Canal & River Trust	Noted. Please refer to response P3/10 made to the First Regulation 19 consultation.
2/P3/6	Places	Support for moorings policy.	2	Canal & River Trust, The Inland Waterways Association	Noted.
2/P3/7	Places	Delivering natural surveillance should not adversely impact on moorings.	1	Canal & River Trust	Noted.
2/P3/8	Places	P3 should include guidance to protect the structure integrity of the Grand Union Canal.	1	Canal & River Trust	No change proposed. Policy D2(a)(vi) requires development to support the operation of infrastructure. Supporting text paragraph GUC.15 to P3 elaborates this policy by requiring that any infrastructure adjacent to or across the canal will need to ensure that the canal's structural integrity is not compromised.
2/P3/9	Places	Support aspiration to secure contributions to enhance the canal.	1	Canal & River Trust	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
2/P3/10	Places	The towpath should be recognised as a Quietway supplemented with additional walking and cycle routes.	1	Canal & River Trust	No change proposed. TfL does not currently plan to deliver a Quietway along the Grand Union Canal.
2/P3/11	Places	Guidance for supporting the use of the canal for heating purposes should be reinstated.	1	Canal & River Trust	No change proposed. Policy EU10 provides guidance for delivering low carbon heat systems. Supporting text to P3 and EU10 recognise the Grand Union Canal as a potential source of heat.
2/P3/12	Places	Question removal of reference to a water space strategy. A comprehensive strategy for the Grand Union Canal should be developed.	2	Canal & River Trust, The Inland Waterways Association	No change proposed. OPDC, the Canal and River Trust and stakeholders are working together to deliver a water space strategy. This will be used to support future planning guidance, including future Local Plans. However, it will not be published in time to inform this version of the Local Plan. As such references have been removed.
2/P3/13	Places	P3 should refer to "heritage canalside warehouses"	1	Hammersmith Society	No change proposed. These warehouses are proposed to be identified as Buildings of Local Heritage Interest that will clarify their status as non-designated heritage assets. Non-designated heritage assets are referenced in policy SP9 and policy D8.
2/P3/14	Places	Removal of reference to the Grand Union Canal Linear Park is not supported.	1	The Inland Waterways Association	No change proposed. The Grand Union Canal Linear Park has been replaced within Policy P3 by the Grand Union Canal Local Park and references to deliver other smaller open spaces and improvements to existing open spaces.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P3/15	Places	Adequate space along the tow path should be provided to support canal users.	1	The Inland Waterways Association	Noted. Policy P3 seeks to deliver supporting infrastructure for moorings along the canal.
2/P3/16	Places	Support Sir Terry Farrell's vision for Park Royal City in relation to the Grand Union Canal.	1	The Inland Waterways Association	Noted. This document does not have planning weight. Policy P3 and any related water space strategies will be developed with stakeholders to enhance the Grand Union Canal.
2/P3/17	Places	Note that the Water Framework Directive is reference in the supporting text. This should be included in the policy. P3 should also seek to prevent the deterioration of the canal and raise its status.	1	Environment Agency	<p>No change proposed. The National Planning Practice Guidance states that Local Plans should avoid undue repetition. It is not considered appropriate to repeat national guidance within the policy. The reference to the Water Framework Directive will be retained in the supporting text.</p> <p>No change proposed, the P3 Vision and policy provide guidance to conserve and enhance the Grand Union Canal. Policy P3 provides a range of guidance to ensure it will be a defining feature of the OPDC area.</p>
2/P3/18	Places	Ownership information of the Grand Union Canal is incorrect.	1	Regents Network	No change proposed. OPDC has confirmed with the Canal and River Trust that the ownership information provided in P3 supporting text is correct.
2/P3/19	Places	Concern regarding impact of development on the canal. Moorings should not be referred	1	Regents Network	<p>Noted. Please refer to response P3/6 made to the First Regulation 19 consultation.</p> <p>No change proposed. Moorings are referred to in the vision</p>

Comment reference	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 in the P3 vision as part of the canal's transport role.			as supporting the canal's role as a leisure and recreation destination.
2/P3/20	Places	The Grand Union Canal should not be activated.	1	Regents Network	No change proposed. OPDC considers activation of the Grand Union Canal is crucial to successful placemaking and in conserving and enhancing the canal.
2/P3/21	Places	Water transport is part of the character of the Grand Union Canal and should be supported.	1	Regents Network	Noted. This is recognised and supported in Policy P3.
2/P3/22	Places	Water space of the canal should be at the heart of the policy.	1	Regents Network	Noted. Guidance for the use of the waterspace of the canal is provided within Policy P3 in relation to land uses, movement, green infrastructure and the environment and heritage and character.
2/P3/23	Places	Historic, infilled basin adjacent to the Rolls Royce Building is not referenced in the Local Plan.	1	Regents Network	Noted. This lost basin is identified in the Heritage Strategy on historic maps. To optimise the use of land within Old Oak North, re-implementation of the basin is not considered to be appropriate. However, Policy P3 supports the delivery of multifunctional new basins and waterspaces.
2/P3/24	Places	The towpath should not be identified as a cycle route. A new cycle network should be delivered. Pedestrian safety along the canal is important.	1	Regents Network	No change proposed. The towpath is part of the National Cycle Network. The Local Plan sets out a comprehensive cycle network which includes the towpath and wider movement network. Policy P3 provides guidance to support both pedestrians and cyclists in the design of the towpath.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P3/25	Places	The northern walking and cycle route along the Grand Union Canal should be segregated where feasible.	1	Grand Union Alliance	No change proposed. The Public Realm, Walking and Cycling Strategy provides recommendations for the design of the towpath. The Old Oak North Development Framework Principles provide guidance for cycle routes in Old Oak North to be designed as appropriate for the level of demand. This includes the route along the north of the canal.

#### Policy 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
2/P4/1	Places	Twyford Tip has extant planning permission. The consented uses in themselves are compatible with neighbouring sites which are designated as SIL and would not prejudice the successful operation of these neighbouring SIL sites. The site should be removed from the proposed Strategic Industrial Land (SIL) designation and should be identified as a site allocation suitable for a mix of uses.	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 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). Currently the site is not considered to be deliverable or developable in the Local Plan period and is therefore not identified as a site allocation.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P4/2	Places	Policy P4 ignores the need to improve areas around Harlesden and Stonebridge stations.	1	John Cox	No change proposed. The objective 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 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.
2/P4/3	Places	Support vision of Park Royal as a leading location for industrial businesses.	1	Mayor of London; Aberdeen Standard Investments; DP9	Noted.
2/P4/4	Places	Policy P4 on heritage and character is inadequate; it does not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.	19	Nye Jones; Gail Robinson; Rachel Ritfield; Ciara Solmi; Bernie Timmins; Jane Dreaper; M.Szoke; James Trew; Eileen Hannington; Marta Donaghey; Jamie Sutcliffe; TITRA; Pablo Navarrette;	No change proposed. 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. Policy D8 provides a clear sequential approach for how the historic significance of the Wesley Estate, as proposed non-designated heritage asset, would be conserved and enhanced.

Comment reference	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 Residents; Mark Walker; Jason Salkey; David Turner; Nicky Guymmer; Elaine Gristock	
2/P4/5	Places	There is no significant new provision of open space in Park Royal. It is unfortunate the only improvements to this open space indicated in the Park Royal Development Framework Principles are "improved connections to the canal". The space offered by the existing waterway should be enlarged and enhanced to form the green-blue backbone of the development.	1	The Inland Waterways Association	No change proposed. Development proposals will be required to contribute to or deliver new or improved open space, including new open spaces in Park Royal Centre identified in Policy P6. 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. An approach to delivering open space either side would be inappropriate as it would not recognise this context and could also undermine the protection of Park Royal SIL. The preparation of a new Grand Union Canal Conservation Area appraisal and associated guidance would provide a means to explore this in more detail.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P4/6	Places	Welcome the amendment which recognises the need for contributions towards and/or delivery of enhanced bus infrastructure to support existing and planned bus services. It may also be necessary to provide direct financial support to new or improved bus services that provide additional capacity or new connectivity. This should be made clear in the policy and supporting text.	1	Transport for London	No change proposed. Local Plan policy T6 (Buses) already refers to the need for development proposals to facilitate, deliver and contribute to the existing and future bus network. Policy T6 applies to the whole OPDC area, including Park Royal.
2/P4/7	Places	Remove policy reference to a jobs target within Park Royal West, or the Park Royal SIL. SIL should be allowed to come forward unfettered in accordance with market conditions, without being overburdened by unnecessary jobs targets.	1	Aberdeen Standard Investments	No change proposed. The jobs figures are indicative (not maximum) targets but they do provide an indication of the number of jobs that could be delivered over the plan period. However, Policies SP5 and E1 are clear that development within SIL should help contribute towards meeting the strategic target of 40,400 new jobs. SP1 and E1 set clear priorities for SIL in seeking to protect, strengthen and intensify it in order to ensure the delivery of additional floorspace as well as new jobs.
2/P4/8	Places	Support increased building heights where this will deliver industrial intensification and SIL compliant broad industrial type activities. This will allow other policy requirements, such as providing a range of unit sizes, to be accorded with i.e. through the stacking of units.	1	Aberdeen Standard Investments	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
2/P4/9	Places	All sites should be required to demonstrate that they have considered the opportunity to intensify their use of land, not just those allocated in the Intensification Study.	1	DP9; Aberdeen Standard Investments	No change proposed. Policy P4 needs to be read in conjunction with E1. Both P4 and E1 make it clear that intensification should be considered on all sites in SIL and development should be comprised of uses suitable for broad industrial type activities. If intensification is not feasible, this should be demonstrated by the applicant as clarified by supporting text for Policy E1.
2/P4/10	Places	Should plan for a permanent facility within Park Royal for skills and training College(s) of Further Education. This would assist in 'gearing up' the workforce.	1	Grand Union Alliance	No change proposed. OPDC's Local Plan supports new social infrastructure, including education facilities, in appropriate locations in line with TCC4. Policy E5 requires a Local Labour Skills and Employment Strategy and Management Plan (LLSESMP) to be provided for major development proposals. A LLSESMP would include detailed information on jobs, skills, supply chain and mitigation. New, on site skill straining centres could be delivered as part of implementing a LLSESMP, if that was considered appropriate.
2/P4/11	Places	The local boroughs have the mechanisms to draw down resources and implement through their Highway Authority role and the Local Implementation Plans. Therefore, the OPDC's proposed interventions have not the required level of certainty as to delivery.	1	Grand Union Alliance	No change proposed. OPDC will be working closely with the boroughs and relevant Highway Authorities to deliver the policies 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
2/P4/12	Places	It is questionable if the improvement ambitions can then be met through a reliance on S106 given that use of this is heavily restricted.	1	Grand Union Alliance	No change proposed. Policy D11 outlines a number of mechanisms to support the successful regeneration of the area, this includes potential alternative funding and financing options.
2/P4/13	Places	Pavements particularly are of poor quality and need to be designed with accessibility and inclusion in mind (in respect of disabled and older people and those with young children and buggies in mind).	1	Grand Union Alliance	Noted. Policies D2, T1 and T2 provide guidance to deliver high quality public realm and walking infrastructure.
2/P4/14	Places	Corridors should be subject to enhancement and development proposals; for example, the approach to Park Royal from Harlesden along Acton Lane, where a significant development opportunity is the Acton Lane frontage to McVities factory.	1	Grand Union Alliance	No change proposed. The objective to improve key routes in Park Royal is considered in Local Plan policies P4, P5 and P6. 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. Based on the submitted information to the previous Call for Sites consultation, the site is considered to be appropriate for assessment for potential development within the Development Capacity Study (DCS). The DCS assessed this site for development potential. This is set out in Appendix A of the Development Capacity Study. This assessment identified that the site is currently not available for development. Availability will be subject to future engagement and detailed work. Should the site become available, development for uses suitable for broad industrial type activities would be 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
2/P4/15	Places	Clusters should be designated around Harlesden and Stonebridge Stations, as has been done for P4C1 Brewery Cluster.	1	Grand Union Alliance	No change proposed. Cluster policies within the Local Plan are considered necessary to provide extra policy detail at the points in the area where most activity is likely to occur. Currently the locations adjacent to Harlesden and Stonebridge within the OPDC area have limited development potential. The objective 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 policies (SP9, P4, P5, P6, 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.
2/P4/16	Places	Wesley Estate is isolated and distant from community supporting facilities and area should be served by a more direct bus route to North Acton Station and beyond.	1	Grand Union Alliance	No change proposed. Policy P6 supports a range of new town centre floorspace and uses (i.e. shops, services and food and drink uses) and D uses (such as community facilities) which should better support local residents and workers.
2/P4/17	Places	Residential above industrial uses in Park Royal should be delivered.	1	Central Acton 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 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. Detailed changes to the SIL boundary have been assessed in the Industrial Land Review Addendum.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P4/18	Places	The strengthening and intensification of Park Royal is supported. Supporting uses could be provided along a linear high street or next to Central Middlesex Hospital	1	Grand Union Alliance	Noted. Policies SP5, P4, P5 and P6 provide guidance for strengthening and intensifying Park Royal including the expansion of the neighbourhood town centre at Park Royal Centre.
2/P4/19	Places	Traffic is a key concern as it is unlikely that people will walk or cycle.	1	Wesley Estate Residents Association	No change proposed. The Park Royal Place and Transport policies prioritise sustainable transport modes which includes walking and cycling but also the use of public transport. 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 supporting text and included within OPDC's Infrastructure Delivery Plan.
2/P4/20	Places	There are problems with car parking. Business parking overflows onto residential streets. Loss of parking and/or increased pressure on road space may result in increased parking displacement to the Wesley Estate.	1	Wesley Estate Residents Association; Grand Union Alliance	Noted. OPDC will work with the local highway authorities to investigate, consult on and implement CPZs.
2/P4/21	Places	Residential amenity needs to be considered including overlooking, noise, odour and disruption.	1	Wesley Estate Residents Association	No change proposed. Local Plan policies SP9, D4, D5, D6, EU4 and EU5 with London Plan policies and national guidance will be used to ensure existing residential areas benefit from appropriate standards of amenity.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P4/22	Places	Affordable community commercial space, e.g. artist studios and workshops, should be included in the mix within Park Royal.		Thomas Dyton; Wells House Road Residents Association	Noted. Affordable workspace and/or shared workspace and/or small business units will be sought in accordance with Policy E3. This policy would be applied across the OPDC area, including Park Royal.
2/P4/23	Places	Require community spaces and facilities – including meanwhile spaces and play areas for children.	2	Thomas Dyton; Wells House Road Residents Association	Noted. Development proposals will be required to provide or make appropriate contributions to ensure the delivery of play space and social infrastructure in accordance with Policy D9 and TCC4. The Social Infrastructure Needs Study identifies infrastructure requirements for and the demands on delivery of social infrastructure, including schools, across the area taking into account projected growth over the plan period. Policy TCC9 supports meanwhile uses which meet certain criteria.
2/P4/24	Places	Welcome amended wording that clarifies the need for improvements to the walking and cycling links to Park Royal and Hanger Lane stations.	2	Transport for London	Noted.



#### 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
2/P5/1	Places	Concerned that the requirement for all sites to seek intensification to compensate for Old Oak de-designation will be onerous. Re-provision of small business units through planning obligations will be difficult if not impossible to achieve.	1	Grand Union Alliance	No change proposed. Both Policies P5 and E1 make it clear that intensification should be considered on all sites in SIL and development should be comprised of uses suitable for broad industrial type activities. If intensification is not feasible, this should be demonstrated by the applicant as clarified by supporting text for Policy E1. Small business units will help ensure a mix of units sizes for different type/size of businesses.

#### 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
2/P6/1	Places	Support proposed town centre designation of 247 Acton Lane. Development on this site can contribute to improving neighbourhood centre.	1	Owner of 247 Acton Lane	Noted.
2/P6/2	Places	247 Acton Lane should be identified as a site allocation that can come forward within the 0-10 year timeframe for residential and retail uses. There is a lack of certainty about the deliverability of other housing sites in the town centre, but 247 Acton Lane can offer a greater degree of certainty	1	Owner of 247 Acton Lane	No change proposed. Residential development capacity within Park Royal Centre has been identified using National Planning Practice Guidance Housing and Economic Land Availability Assessment guidance based on the Park Royal Development Framework Principles capacity assessment. In order to be identified as a site allocation a site has to meet the thresholds set out in paragraph 3.83 which includes phasing and minimum capacity requirements. Therefore, the site is 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
		and help meet higher housing target.			considered to meet these thresholds and has not been identified as a site allocation; however, this would not prohibit development of the site. Also, paragraph PRC5 notes that further work is required to understand the deliverability of additional sites within Park Royal Centre, including the sites to the south east of the road junction.
2/P6/3	Places	Higher development heights and density should be supported in the Park Royal neighbourhood centre, including a 8-10+ storey building on 247 Acton Lane site.	1	Owner of 247 Acton Lane	No change proposed. It is not appropriate to identify individual site specific building heights or densities in the Local Plan. These will be assessed on a site by site basis in accordance with Policies SP9, D4 and all other relevant policies in the Local Plan, London Plan and other material considerations.
2/P6/4	Places	More interesting shops are needed to make Park Royal a town centre. These should welcome all residents, workers and visitors regardless of race or creed.	1	Wesley Estate Residents Association	No change proposed. Policy P6 supports a range of new town centre floorspace and uses (i.e. shops, services and food and drink uses) to help provide a mix of activities. The planning process cannot control or influence which businesses occupy the units.
2/P6/5	Places	Park Royal Centre has further potential to provide additional specialist older persons housing. Policy P6 should include the flexibility to enable a mix of housing to come forward, including specialist housing. Amendments to the text suggested.	1	London Borough of Brent	No change proposed. Supporting text has already 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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P6/6	Places	The proposed amendment to the boundary of the Park Royal Strategic Industrial Location (SIL) which has been extended to the west of the Neighbourhood Centre to include a parcel of land on Western Road which is owned by RBKC is not justified, nor effective and as such is unsound. The proposals map for the emerging OPDC Local Plan should be corrected in line with the existing adopted Ealing Proposals Map. A change of use to a sui-generis to be utilised as a car pound would be the best future alternative use of the site.	1	Royal Borough of Kensington and Chelsea	No change proposed. OPDC notes that Ealing's Proposals Map did not identify the site as within the Park Royal Strategic Industrial Location (SIL). OPDC's Industrial Land Review was consulted on as part of the Regulation 18 and first Regulation 19 consultation. This showed the site as SIL. No representations were made contesting the designation. The pre-application discussions regarding proposed use of the site as a car pound is not a matter for the Local Plan to consider. Industrial type functions, services and activities may be permitted in SIL and any proposed use would be assessed on a case by case basis to ensure that it would not undermine the function of SIL or other SIL uses.
2/P6/7	Places	Concerned that the search for infrastructure costs to cover intensified development plans for Park Royal will lead to poor quality and overly dense and high developments coming forward in the Park Royal Centre area, Policy P6, in order to fund and support infrastructure developments and meet wider OPDC targets.	1	Grand Union Alliance	No change proposed. Local Plan policies SP9, D4, D5 and D6 with London Plan policies and national guidance will be used to delivery the highest standards of design quality and ensure existing residential areas benefit from appropriate standards of amenity.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P6/8	Places	Town centre proposals for Park royal are overambitious. Improved public transport, particularly linking areas within and outside the OPDC area, together with proximity to other facilities in local centres within walking distances and more modest, sensitively sited housing are supported in principle.	1	Grand Union Alliance	No change proposed. Policy P6 is informed by a range of evidence base which demonstrate the need and/or deliverability of the proposals, including the Park Royal Development Framework Principles document and Retail and Leisure Needs Study. Improvements to facilitate walking, cycling and public transport use and support for new town centre facilities housing are already covered in the policy.
2/P6/9	Places	Provision of key worker housing should be part of policy for housing development in Park Royal Town Centre.	1	Grand Union Alliance	No change proposed. To ensure the plan is in general conformity with the London Plan, the policy seeks to deliver the Mayor's preferred affordable housing tenures which are London Affordable Rent, London Living Rent and London Shared Ownership. London Living Rent in particular will help households on average income levels to save for a deposit. Key workers would be considered eligible for this type of accommodation. London Living Rent is referred to as part of OPDC's tenure mix in Policy H2 which would apply across the OPDC area.
2/P6/10	Places	Concerns over the quality of the public realm, adequacy of open space, play space, community space and school place provision in the general area. Issues will be exacerbated by more housing. Should provide lifetime neighbourhood and a full range of supporting services should be within walking distance.	1	Grand Union Alliance	No change proposed. Development proposals will be required to provide or make appropriate contributions to ensure the delivery of high quality public realm, public open space, play space and social infrastructure in accordance with Policy D2, D9, EU1 and TCC4. The Social Infrastructure Needs Study identifies infrastructure requirements for and the demands on delivery of social infrastructure, including schools, across the area taking into account projected growth over the plan period. Policy P6 supports additional town centre floorspace in Park Royal Centre so that it can better service 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
					businesses, employees and residents on the Park Royal estate.
2/P6/11	Places	There should be early consultation with the community on the junction realignment and all public realm and movement proposals.	1	Grand Union Alliance	Noted. Consultation will be carried out in accordance with OPDC's Statement of Consultation and Policy D1.
2/P6/12	Places	New and or improved continuous walking and cycling routes need to be supported by having secure, visually acceptable cycle banks / hubs / racks at appropriate sites within the town centre.	1	Grand Union Alliance	No change proposed. Development proposals will be required to provide high quality, secure, well located, convenient and accessible cycle parking facilities in accordance with Policy T3. This policy will apply across the OPDC area.
2/P6/13	Places	Fig.4.19 should be amended to include at least those buildings of merit that were included in the draft Local Heritage Listings document, along with part of the proposed Local Character Area (see Policies Map). An adverse impact on the local street scene and heritage assets, together with a lack of sensitivity to the predominant low rise character of the area would result from a tall building at the Asda site. Way finding should not justify tall buildings.	1	Grand Union Alliance	No change proposed. Proposed Local Heritage Listings have yet to be adopted. Should these be adopted by OPDC prior to the Independent Examination, their depiction in Figure 4.19 will be proposed as a minor modification. Subject to the Planning Inspector's decision, these assets will be shown in the Local Plan.

**Policy P7- North Acton and Acton Wells**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/P7/1	Places	Support for safeguarding land for the West London Orbital Line Station.	1	London Borough of Brent	Noted.
2/P7/2	Places	Guidance for safeguarding of land for the WCML Crossrail Spur should be reinstated.	1	London Borough of Brent	No change proposed. DfT and TfL have formally withdrawn support for this proposal. Exploration of delivering the Chiltern Line to Old Oak Common Station is underway. This would prohibit the delivery of the WCML spur.
2/P7/3	Places	OPDC should work with the London Borough of Ealing to stop tall buildings and preserve the Castle Public House.	1	West Acton Residents Association	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. This is reflect in policy D5. As part of the Scheme of Delegation with the London Borough of Ealing, Ealing continues to determine planning applications in North Acton. Ealing's planning officers should be making use of OPDC's Local Plan policies D8: Heritage and TCC7 to manage any application affecting the Castle Public House.
2/P7/4	Places	Equality Impact Assessments have not been carried out to assess impact of high density development in North Acton	1	West Acton Residents Association	No change proposed. The Local Plan's Integrated Impact Assessment integrates an Equalities Impact Assessment, including the policies for building heights in North Acton.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P7/5	Places	Support for safeguarding land for the West London Orbital Line Station.	1	London Borough of Brent	Noted.
2/P7/6	Places	Request for continued safeguarding of Elizabeth Line Spur	1	London Borough of Brent	No change proposed. DfT and TfL have formally withdrawn support for this proposal. Exploration of delivering the Chiltern Line to Old Oak Common Station is underway. This would prohibit the delivery of the WCML spur.
2/P7/7	Places	Policy P7 should state TfL owned land surrounding North Acton Station is suitable for high quality residential led development including tall buildings.	1	Transport for London Commercial Development	No change proposed. Policy P7 supports mixed use high density residential development across the area. Policy SP9 identifies North Acton and Acton Wells as an appropriate location for tall buildings in principle.
2/P7/8	Places	Figure 3.15 conflicts with Policy P7 guidance for building heights.	1	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. To reflect the building heights illustrated in the Victoria Road and Old Oak Lane Development Framework Principles, Policy P7(l) will be amended to clarify the location of where 10-12 storeys will generally be appropriate along Victoria Road.
2/P7/9	Places	Welcome removal of safeguarding for the Elizabeth Line Spur	1	Osbourne Investments Limited and Quattro Holdings Limited	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
2/P7/10	Places	Size and location of Acton Wells Square should be confirmed as indicative.	1	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. Local Plan Appendix identifies that figures in the Local Plan are indicative.
2/P7/11	Places	Boden House is appropriate for the highest density of development and tall building heights.	1	Osbourne Investments Limited and Quattro Holdings Limited	Noted. Development densities and building heights will be determined using all relevant Local Plan and London Plan policies alongside any relevant material considerations.
2/P7/12	Places	Suggest that text is added noting that "TfL is currently undertaking work with stakeholders to further develop the proposal, including reviewing the feasibility of the scheme and updating the business case."	1	Transport for London	Change proposed. The suggested wording will be added to supporting text to Policy P7.
2/P7/13	Places	Guidance for delivering generally lower heights adjacent to existing residential neighbourhoods to be inadequate	1	TITRA	No change proposed. This guidance is considered to be appropriate for the role of a Local Plan and reflects recommendations in the Victoria Road and Old Oak Lane Development Framework. 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. Relevant Local Plan policies include D4, D5, D6 and D8 and 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
2/P7/14	Places	Object to tall buildings in North Acton and Acton Wells	1	TITRA	No change proposed. This guidance is considered to be appropriate for the role of a Local Plan and reflects recommendations in the Victoria Road and Old Oak Lane Development Framework. 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. Relevant Local Plan policies include D4, D5, D6 and D8 and place policies.
2/P7/15	Places	Support for building heights guidance.	1	Aberdeen Standard Investments	Noted.
2/P7/16	Places	Cluster policies should repeat place policies	1	Aberdeen Standard Investments	No change proposed. The National Planning Practice Guidance states that Local Plans should avoid undue repetition. It is not considered appropriate to repeat place policies within cluster policies.
2/P7/17	Places	North Acton is a poor example for Old Oak. Overstation development will negatively impact the SINC designation of the railway corridor.	1	Grand Union Alliance	Noted. The Local Plan provides strategic guidance to deliver a high quality built environment of new development in the OPDC area. Any development affecting SINC designations will need to accord with policy EU2.
2/P7/18	Places	Support for P7 Vision, land use, public realm and movement and building heights guidance.	1	Citrus Group and Fuller Smith & Turner	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
2/P7/19	Places	Object to the proposed Local Listing of The Castle Public House.	1	Citrus Group and Fuller Smith & Turner	No change proposed. Please refer to response to First Regulation 19 Consultation comment P7/10.

#### Policy 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
2/P7C1/1	Places	Support for local heritage listing of The Castle Public House.	1	Ealing Civic Society	Noted.
2/P7C1/2	Places	Wording should be amended to provide flexibility for the delivery of a range of public realm typologies for the station square based on future detailed design.	1	Transport for London	Change proposed. Supporting text to P7C1 will be updated to make reference to alternative station public realm layout to ensure the design of public realm responds to future detailed design of improvements to North Acton Station.
2/P7C1/3	Places	Support for guidance for improvements to North Acton Station	1	Transport for London	Noted.
2/P7C1/4	Places	Guidance for green infrastructure in P7C1 is brief.	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for green infrastructure for North Acton and Acton Wells is provided in policy P7.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P7C1/5	Places	The Castle Public house is somewhat dilapidated with a future decline in business expected. New developments in the area include A3/A4 uses.	1	Citrus Group and Fuller Smith & Turner	No change proposed. Any loss of the Public House Use will be determined using Local Plan policy TCC5 and London Plan policy HC7 alongside all other relevant policies and material considerations.

#### Policy 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
2/P7C2/1	Places	Welcome changes made to policy in response to Regulation 19(1) consultation.	1	Castlepride Limited	Noted.
2/P7C2/2	Places	Midland Gate site should be identified as a location appropriate for a tall building in principle in figure 3.15	1	Castlepride Limited	No change proposed. The locations where tall buildings will be an appropriate form in principle have been identified through the methodology set out in OPDC's Tall Buildings Statement. This states that the location of existing residential neighbourhoods and public transport accessibility levels have been used to inform the locations where tall buildings will be an appropriate form in principle. Given the proximity of the existing residential areas, for the purposes of the Local Plan, Midland Gate has not been identified. However, all relevant policies and material considerations will be used to inform any planning application discussions, including viability considerations.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P7C2/3	Places	Infrastructure requirements placed on Midland Gate site will require the delivery of a tall building to ensure viable development of the site.	1	Castlepride Limited	No change proposed. Policies SP12 and DI1 provide guidance to ensure development contributes appropriately and proportionately towards required infrastructure. All relevant policies and material considerations will be used to inform any planning application discussions, including viability considerations.
2/P7C2/4	Places	Comments should be read in relation to Regulation 19(1) comments	1	Castlepride Limited	Noted.
2/P7C2/5	Places	Concerns regarding delivery of a bridge between Old Oak South and Acton Wells.	2	Thomas Dyton, Wells House Road Residents Association	Noted. Policy P7C2 provides guidance to deliver a continuous walking and cycling route between Old Oak South and Acton Wells which does not distinguish between a bridge of underpass. However, supporting text recognises that emerging feasibility studies by Transport for London identify that this connection may need to be delivered as cycling and footbridge. Should this be confirmed Local Plan policies D6 and EU5 will be used to ensure the bridge does not cause unacceptable harm to the amenity of existing residential uses.
2/P7C2/6	Places	Wording should be amended to provide flexibility for the delivery of a range of public realm typologies for the station square based on future detailed design.	1	Transport for London	Change proposed. Supporting text to P7C2 will be updated to make reference to alternative station public realm layout to ensure the design of public realm responds to future detailed design of improvements to North Acton Station.
2/P7C2/7	Places	Policy text should refer to the station as potential.	1	Transport for London	Change proposed. The word 'potential' has been inserted into the policy 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
2/P7C2/8	Places	Alternative supporting text wording describing the transport interchange role of Old Oak Common Lane Station should be provided.	1	Transport for London	No change proposed. OPDC considers the wording in the Local Plan to be sufficiently clear.
2/P7C2/9	Places	Support for recognition of the challenges to delivering a walking and cycling link between Old Oak South and Acton Wells.	1	Transport for London	Noted.
2/P7C2/10	Places	Proposals for the walking and cycling link between Old Oak South and Acton Well do not reflect the most up to date information.	1	TITRA	No change proposed. The guidance for the walking and cycling link set out in policy P7C2 is based on the most up to date information at time of writing.
2/P7C2/11	Places	P7C2 Vision should be amended to refer to Old Oak Common Lane Station being a gateway.	1	Aberdeen Standard Investments	No change proposed. P7 Vision is considered to appropriate set out the Local Plan aspirations for the cluster regarding connectivity.
2/P7C2/12	Places	Figure 4.25 is not clear and should include guidance from Acton Wells East site allocation.	1	Aberdeen Standard Investments	No change proposed. Acton Wells East site allocation does not provide spatial guidance so cannot be illustrated. Figure 4.25 is considered to be sufficiently clear for an illustrative diagram supporting policy P7C2.

**Policy P8- Old Oak Lane and Old Oak Common Lane**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/P8/1	Places	Oppose release of SIL south of the WCML. The retention of SIL could support delivery of a new bypass.	1	John Cox	No change proposed. The release of this land is supported by OPDC's Industrial Land Review Addendum. The need for a bypass is not identified in OPDC's transport supporting studies.
2/P8/2	Places	Policy P8 does not adequately protect local heritage and character, including Midland Terrace and Shaftesbury Gardens. A buffer should be provided around existing communities.	24	Nye Jones, Gail Dobinson, Natasha Salkey, Rachel Ritfeld, Ciara Solmi, Bernie Timmins, Jane Dreaper, Janice Gayle-Farlow, M. Szoke, James Trew, Eileen Hannington, Marta Donaghey, Jamie Sutcliffe, Pablo Navarrete, Mark Walker, Jason Salkely, Elaine Gristock, David Turner, Nicky Guymmer, Midland Terrace Residents,	<p>No change proposed. OPDC's Heritage Strategy undertook a comprehensive review of the historic significance of the OPDC area. The result of which is that Midland Terrace is recognised as a historic residential enclave. A range of Local Plan and London Plan policies will be used to conserve and enhance heritage assets and ensure development would not cause unacceptable harm to the amenity of existing residential uses. The Local Plan policies relevant to heritage and amenity include SP9, D6, D8, EU4, EU5, EU6, P2 and P8(g)(h) and (j).</p> <p>No change proposed. Existing residential uses are identified as sensitive locations in figure 3.15 supporting Policy SP9. This has informed the locations where tall buildings are an appropriate form in principle. Setting a definitive buffer zone is not considered appropriate for the role of the Local Plan as a strategic planning document.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				Thomas Dyton, Wells House Road Residents Association, Alison Braysha, Grand Union Alliance	
2/P8/3	Places	Overview of Wells House Road Residents Association and recognition of support for other community group responses.	2	Thomas Dyton, Wells House Road Residents Association	Noted.
2/P8/4	Places	Channel Gate Road should be closed.	1	Bruce Stevenson	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. Policies D6, EU4, EU5 and P8 provides specific guidance to mitigate the impacts of noise and air pollution.
2/P8/5	Places	OPDC should work with HS2 to provide acoustic glazing and air filtering systems to all houses in Wells House Road. The sustaining wall should be rebuilt. OPDC should work with residents to discuss ideas to mitigate impacts.	2	Thomas Dyton, Wells House Road Residents Association	<p>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.</p> <p>No change proposed. The exact nature of the reprovion of any wall is too detailed an issue for the Local Plan, but could be something covered through a Neighbourhood Plan.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P8/6	Places	Strong support for retention of SIL designation of the Willesden Junction Bus Depot	1	Transport for London	Noted.
2/P8/7	Places	Figure 4.27 should not show any new access onto Wormwood Scrubs.	1	Wormwood Scrubs Charitable Trust	<p>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 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.</p> <p>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</p>



Comment reference	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>protection of Metropolitan Open Land.</p> <p>Any amendments from future studies will be used to inform future versions of the Local Plan.</p>
2/P8/8	Places	Wormwood Scrubs is more than a roadside space.	1	Wormwood Scrubs Charitable Trust	Noted. The Local Plan recognises the roles of Wormwood Scrubs in policy P12.
2/P8/9	Places	The heritage of Wormwood Scrubs should be referred to in Policy P8.	1	Wormwood Scrubs Charitable Trust	No change proposed. Policy D8 requires proposals to demonstrate how they respond to the OPDC heritage themes. This would apply to Wormwood Scrubs regardless of it not having a heritage designation.
2/P8/10	Places	Should be noted that early delivery of new housing and commercial space is being achieved at Oakland and the other sites offer an opportunity to deliver early development and assist wider development, including EMR site.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Policy SP9 provides guidance that supports the delivery of early development. A reference to a single specific site within the spatial vision is not considered to be required.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P8/11	Places	Support for green infrastructure guidance	1	London Borough of Hammersmith and Fulham	Noted.
2/P8/12	Places	Policy wording should be provided for SuDs	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU3 provides guidance for SuDS
2/P8/13	Places	Triangle site should be used of open space.	1	Grand Union Alliance	Noted. Policy P8C1 proposed the site for publicly accessible open space.
2/P8/14	Places	Continued designation of SIL at Willesden Junction Bus Depot restricts connections north and south of railways.	1	Grand Union Alliance	<p>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:</p> <ul style="list-style-type: none"> <li>- Secures sustainable transport services to serve existing and planned growth;</li> <li>- Robust service provision supported accessibility provided by close proximity to Willesden Junction Station;</li> <li>- Employment of over 300 people with training facilities.</li> </ul> <p>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. Relevant policy components include:</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					<ul style="list-style-type: none"> <li>- requiring active and positive frontages on to the public realm</li> <li>- ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space</li> </ul> <p>OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.</p>

#### Policy 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
2/P8C1/1	Places	Should be noted that early delivery of new housing and commercial space is being achieved at Oakland and the other sites offer an opportunity to deliver early development and assist wider development, including EMR site.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Policy SP9 provides guidance that supports the delivery of early development. A reference to a single specific site within the spatial vision is not considered to be required.
2/P8C1/2	Places	Support for green infrastructure guidance	1	London Borough of Hammersmith and Fulham	Noted.

2/P8C1/3	Places	Old Oak Common Lane Station does not have a supporting diagram.	1	Grand Union Alliance	No change proposed. Figure 4.25 is the diagram for policy P7C2.
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#### 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
2/P9/1	Places	Plantagenet House and Windsor House will be handed back these as cleared sites following end of construction. Policies should be flexible. Mixed use development would bring benefits and should be supported. The sites fronting Victoria Road should be released from SIL.	1	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	No change proposed. The Strategic Industrial Location designation for the place of Channel Gate, including Plantagenet House and Windsor House, is critical to delivering OPDC's Local Plan's Spatial Vision to strengthen and intensify Park Royal. This importance is illustrated by its designation as a site allocation and is key to enabling OPDC in meeting its employment targets with the provision of 7,600 new jobs. This significant level of employment reflects the current need for industrial floorspace as set out in OPDC's Industrial Land Review. The Industrial Land Review Addendum has also undertaken a robust assessment for managing the release of Strategic Industrial Location. This sets out a number of criteria which OPDC does not consider the sites of Plantagenet House and Windsor House would meet. Therefore Plantagenet House and Windsor House are proposed to continue to be designated as SIL for the plan period.
2/P9/2	Places	Want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.	19	Nye Jones; Gail Robinson; Natasha Salkey; Rachel Ritfield; Ciara Solmi; Bernie Timmins; Jane Dreaper; M.Szoke;	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. Policies D6, EU4, EU5 and P8 provides specific guidance to mitigate the impacts of noise and air pollution.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
				James Trew; Stephanie Hewett; Eileen Hannington; Marta Donaghey; Jamie Sutcliffe; TITRA; Pablo Navarrette; Midland Terrace Residents; Mark Walker; Jason Salkey; Elaine Gristock; David Turner; Nicky Guymer; Grand Union Alliance	
2/P9/3	Places	Welcome the Policy P9 vision for a strengthened connection / bridge between Atlas Road and the Channel Gate Yard.	4	Rachel Ritfield; James Trew; Eileen Hannington; Mark Walker	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
2/P9/4	Places	Issues link to lorries, parking enforcement, flytipping, danger of crossing on Channel Gate Road.	2	Jane Dreaper; Stephanie Hewett	Noted. No change proposed. The Victoria Road and Old Oak Lane Development Principles document has considered measures to mitigate impacts of traffic and improve pedestrian and cycling movement. These recommendations have been incorporated into the revised Local Plan. OPDC's remit is limited to its role as a local planning authority. Parking Enforcement and waste collection remain the responsibility of the relevant local authority.
2/P9/5	Places	Children have no place to play safely and are at risk playing on the side of the road, we have no local park space. Channel Gate road should be permanently closed and transformed into a park.	1	Stephanie Hewett	Noted. Policy P8 seeks to deliver a high quality, well connected, network of multifunctional publicly accessible open spaces, including enhancements to and expansion of the Old Oak Community Gardens adjacent to The Island Triangle. Proposals for development should also contribute positively to maximising opportunities for high quality multifunctional play in line with Policy D9.
2/P9/6	Places	The policy does not state what the lower heights are. TITRA regards this section of Policy P9 as inadequate until guideline heights are discussed openly, consulted on and then included.	1	TITRA	No change proposed. Development of Channel Gate will take place in the longer term. Therefore provision of detailed heights guidance is not considered appropriate at this point in time.
2/P9/7	Places	There is an opportunity to create a buffer between Park Royal and the heritage residential areas by fine grained employment activities and new residential as appropriate	1	Grand Union Alliance	Noted. Policy P8 seeks to enhance and expand the Old Oak Community Gardens adjacent to The Island Triangle. Any development would need to accord with Policy D8 to conserve and enhance the Old Oak Lane Conservation 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
2/P9/8	Places	The planned bridge over the Grand Union Canal should be moved to the east, so the line of its road more naturally becomes part of a A4000 bypass, to the west of the Island Triangle estate.	1	John Cox	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. Policies D6 and P8 provides specific guidance to mitigate the impacts of noise and air pollution.
2/P9/9	Places	Policies should provide sufficient flexibility for the site (Plantagenet, Stuart, Windsor House) to contribute positively to OPDC's strategic objectives. A mix of uses including employment, residential and other uses will facilitate intensification and meet other Local Plan objectives. Request that frontage is de-designated from SIL	1	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	No change proposed. The Strategic Industrial Location designation for the place of Channel Gate, including Plantagenet House and Windsor House, is critical to delivering OPDC's Local Plan's Spatial Vision to protect, strengthen and intensify Park Royal. This importance is illustrated by its designation as a site allocation and is key to enabling OPDC in meeting the employment targets set by the Mayor, with the potential to deliver 7,600 new jobs. There is likely to be an ongoing demand for industrial space as set out in OPDC's Industrial Land Review. The Industrial Land Review Addendum has also undertaken a robust assessment for assessing further SIL boundary changes based on a number of criteria. OPDC does not consider the sites of Plantagenet House and Windsor House is suitable for release when assessed against this criteria, therefore Plantagenet House and Windsor House are proposed to continue to be designated as SIL for the plan period.

## 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
2/P10/1	Places	Requirement for footpath width in Policy P10 is greater than those identified in pre application discussions.	1	Old Oak Park Limited	No change proposed. The proposed width of the footpath is recommended by the Scrubs Lane Development Framework Principles to support walking, green infrastructure and spill out space for adjacent land uses.
2/P10/2	Places	Lack of evidence for increased development capacity.	1	The Hammersmith Society	No change proposed. Development capacity is defined in OPDC's Development Capacity Study. This has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments to demonstrate how the London plan targets can be delivered. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Scrubs Lane Development Framework and includes updated development management information. This information has led to an increased in development capacity within the Place of Scrubs Lane in relation to the release of an additional development site for development which previously was required for a new access route into Old Oak North.
2/P10/3	Places	Evidence base for tall buildings along Scrubs Lane is not sufficient and should give more consideration to the impact of tall buildings along Scrubs Lane on the St Mary's and Kensal Green Cemeteries. Policy is too prescriptive.  Guidance for visual permeability should be reinstated.	3	Royal Borough of Kensington and Chelsea, Historic England, Grand Union Alliance	No change proposed. The approach to tall buildings, and level of detail of policies, 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 current London Plan and Draft New London Plan by ensuring the guidance for tall buildings is part of a planned approach to developing Scrubs Lane by identifying appropriate, sensitive and inappropriate locations for tall buildings. A Strategic Views Assessment on the impact



Comment reference	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>Policy retrofits approved decisions.</p> <p>Scrubs Lane Direction of Travel document was not consulted on as part of the Local Plan consultation.</p>			<p>on relevant heritage assets was carried out to inform the Scrubs Lane Development Framework Principles. The assessment considered the impact on locations outside of the OPDC area including Kensal Green Cemetery. 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.</p> <p>Change proposed. To provide clarity for the need for visual permeability, text from the first Regulation 19 Revised Draft Local Plan will be reinstated. This will complement Local Plan Policy D4 and Draft New London Plan policy D8.</p> <p>No change proposed. 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.</p> <p>No change proposed. The Scrubs Lane Development Framework Principles document supersedes the Scrubs Lane Direction of Travel document. This is a supporting study to the Local Plan and was subject to the first and second Regulation 19 consultations.</p>
2/P10/4	Places	Further information defining a cluster of uses should be provided.	1	Historic England	No change proposed. The Scrubs Lane Development Framework Principles (Principle 4) sets out the approach to clustering uses. These are defined for each cluster and reflected in Policies P10, P10C1, P10C2, P10C3 and P10C4.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P10/5	Places	Supporting text paragraph regarding Cumberland Park Factory Conservation Area is welcomed. Guidance for the conservation should be included in the policy.	1	Historic England	No change proposed. The National Planning Practice Guidance states that Local Plans should avoid undue repetition. Guidance for designated heritage assets is provided in policy D8.
2/P10/6	Places	Support for delivering improved cycling facilities along Scrubs Lane that will support bus services.	1	Transport for London	Noted.
2/P10/7	Places	If widened footpath requires loss of publicly accessible open space or vegetation further detailed work will be required. Figure 4.34 should be clear where footpath improvements will be located. No new access onto the Scrubs should be shown.	1	Wormwood Scrubs Charitable Trust	<p>Noted. P12 identifies that any proposals affecting Wormwood Scrubs will need 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.</p> <p>No change proposed. Local Plan Appendix identifies that figures in the Local Plan are indicative. The Scrubs Lane Development Framework Principles document provides further detail for the footpath.</p> <p>No change proposed. 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.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/P10/8	Places	Support for early delivery of development along Scrubs Lane	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
2/P10/9	Places	Policy should reinstate SuDs guidance.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU3 provides guidance for SuDS
2/P10/10	Places	Employment heritage is not sufficiently recognised. Affordable workspace is not adequately specified.	1	Grand Union Alliance	No change proposed. Scrubs Lane's employment heritage is referenced in P10 Vision, Policy P10 and supporting text. Specific references relate to the continued delivery of employment floorspace, typology of development and designation of the Cumberland Park Factory Conservation Area. Guidance for affordable workspace is provided in policy E3.
2/P10/11	Places	<p>Transport infrastructure for new east west connections between Scrubs Lane and Old Oak North will create barriers for local communities.</p> <p>Potential Hythe Road Overground Station is uncertain.</p> <p>A new Overground Station at White</p>	1	Grand Union Alliance	<p>No change proposed. Policies SP7, P2, P10, D2 and T1 provide guidance to deliver a high quality movement within Old Oak North and Scrubs Lane that connects surrounding communities. This is delivered at a level appropriate to the role of a Local Plan. Detailed design of connections will need to accord with this guidance.</p> <p>Noted. TfL supports the preferred option of a viaduct and potential new station at Hythe Road. The benefits of this solution have been demonstrated through TfL's business case work and the public consultation carried out in</p>

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		City Roundabout would improve PTAL.			autumn 2017 showed significant public support for the proposals. The Overground station at Old Hythe Road is planned to be delivered by 2026 to coincide with the opening of Old Oak Common station. OPDC is currently working with partners including HS2, Network Rail and TfL to confirm a funding package for the station.  Noted.
2/P10/12	Places	Planning application response to Local Plan policies are premature and do not meet the Mayor's ambition for 50% affordable housing.	1	Grand Union Alliance	No change proposed. 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.

#### Policy P10C2- Laundry 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
2/P10C2/1	Places	Delivering Park Road as an all modes link will be challenging.	1	Old Oak Park Limited	Noted. The Old Oak North Development Framework Principles has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. The consultants undertook a robust assessment of the technical constraints of Old Oak North to identify deliverable connections to surrounding areas. This work has shown that at a strategic level appropriate for the Local Plan, Park Road is deliverable.

2/P10C2/2	Places	Question local listing of 26-30 Scrubs Lane	1	Old Oak Park Limited	No change proposed. OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that 26-30 Scrubs Lane exhibited sufficient local heritage significance to warrant its proposed designated as a non-designated heritage asset on OPDC's forthcoming Local Heritage Listings. The conservation and enhancement of this asset will be managed by Policy D8.
2/P10C2/3	Places	Delivery of 30% publicly accessible open space should take an area wide approach.	1	Old Oak Park Limited	No change proposed. The target is to ensure that 30% of the developable area is publicly accessible open space. To achieve this, 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. Further information will be provided in the forthcoming Planning Obligations SPD
2/P10C2/4	Places	Alternative options for delivering access to Scrubs Lane should be identified if Park Road and Laundry Bridge cannot be delivered as an all modes routes.	1	Old Oak Park Limited	No change proposed. The Old Oak North Development Framework Principles has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. The consultants undertook a robust assessment of the technical constraints within the Old Oak North area to identify deliverable connections to the existing street network. This recommends that Laundry Bridge should be designed to cater for pedestrians, cyclists, buses and for access only vehicles. As such the Local Plan reflects this recommendation. Any alternative arrangement will be considered for inclusion within the forthcoming Old Oak North and Scrubs Lane SPD.

### Policy 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
2/P10C3/1	Places	Support for delivering Hythe Road underpass as an all modes connection. Request that enhancements are identified to enable double decker bus movement.	1	Transport for London	Change proposed. Policy T6 (Buses) identifies the need to deliver interventions set out in the IDP to facilitate the delivery of a new bus network. The IDP will be amended to provide clarity regarding the need to deliver enhancements to allow the movement of double-decker buses.
2/P10C3/2	Places	Policy wording should be provided for SuDs	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU3 provides guidance for SuDS
2/P10C3/3	Places	Continued use of the Haul Road for freight movement will negatively impact walking and cycling movement.	1	Grand Union Alliance	Noted. The retention of the Haul Road in the existing location is recommended by the Old Oak North Development Framework Principles based on a robust assessment of the technical constraints to identify deliverable connections to the existing street network. Policies P10, P10C3, D2, T1, T2 and T3 provide guidance for delivering high quality walking and cycling routes.

### Policy 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
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2/P10C4/1	Places	Any separate walking and cycling bridge adjacent to Mitre Bridge will need to carefully consider its impact on Mary Seacole Gardens.	2	Regents Network, Grand Union Alliance	Noted. Policy wording for P10C4 does not provide guidance for delivering a separate walking and cycling bridge. Supporting text highlights potential delivery of a bridge subject to it being demonstrated to be required and feasible. This would require further detailed technical and design work to deliver the bridge and mitigate impacts on Mary Seacole Gardens in accordance with policies P10C4 and EU1.
2/P10C4/2	Places	Policy wording should be provided for SuDs	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU3 provides guidance for SuDS

#### 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
2/P11/1	Places	Willesden Junction Station should be included in earlier phases of development. Willesden Junction Station should be a site allocation. The Plan should state support for over-station development.	1	London Borough of Brent	Change proposed. The phasing of development is defined in OPDC's Development Capacity Study (DCS) and does not preclude the delivery of new connections between Harlesden, Willesden Junction Station and Old Oak North. The DCS has been developed in accordance with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. This considers deliverability and developability of sites to inform phasing. Based on current information, potential development over and adjacent to the station is challenging due to the inter-related complexities created by railway infrastructure, restricted accessibility and complex land ownerships. These issues are considered to impact on the developability of development above and adjacent to the station resulting in development to currently be envisaged outside of 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
					<p>However, OPDC has established the Willesden Junction Steering Group involving key stakeholders, including the London Borough of Brent, and has commissioned additional work to identify development feasibility and potential capacity. Policy P11 explicitly supports the earlier delivery of new homes and jobs within the plan period by optimising development on and/or adjacent to the station and tracks. Policies SP10 and DI2 also support the timely delivery of development, potentially in advance of identified phasing. In light of the area's potential longer term development capacity, the area to the west of Willesden Junction Station will be shaded to represent development capacity beyond the plan period.</p> <p>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 is the role of OPDC's Infrastructure Delivery Plan. Policy P11 supports the timely delivery of upgrades to Willesden Junction Station.</p>
2/P11/2	Places	Location of borough boundaries through Willesden Junction Station has prevented improvements.	1	John Cox	Noted. Policies P11 and T4 provide guidance for improving Willesden Junction Station.
2/P11/3	Places	Wording should be amended to provide flexibility for the delivery of a range of public realm typologies for the station square based on future detailed design.	1	Transport for London	Change proposed. Supporting text to P11 will be updated to make reference to alternative station public realm layout to ensure the design of public realm responds to future detailed design of improvements to Willesden Junction Station.



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2/P11/4	Places	Supporting text to Policy P11 should make reference to the need for stakeholders to agree an approach to station enhancements.	1	Transport for London	Change proposed. Supporting text to P11 will be updated to make reference to the need for stakeholders to agree an approach to station enhancements
2/P11/5	Places	Welcome the Train Maintenance Depot being delivered outside of the plan period.	1	Transport for London	Noted.
2/P11/6	Places	Transport Orientated Development – should note that the provision of a new bridge link between the Station and the regeneration area to the south, landing in the European Metals Recycling (EMR) site, will bring about significant benefits.	1	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. The supporting text to Policy P2 sets out the benefits and challenges to delivering a new walking and cycling route between Willesden Junction and Old Oak North.
2/P11/7	Places	Support for green infrastructure guidance	1	London Borough of Hammersmith and Fulham	Noted.
2/P11/8	Places	The Local Plan does not provide adequate connections to Harlesden town centre. Guidance for the Harlesden Enhancement Strategy is insufficient.	1	Grand Union Alliance	No change proposed. The Local Plan recognises the importance of connecting with surrounding areas, including Harlesden. Policies SP7, T6 and Place Policies P2, P8, P10 and P10 set out guidance to connect Harlesden through bus services, walking and cycling to Old Oak.  No change proposed. Guidance for delivering measures

Comment reference	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 support the continuing vitality and viability of Harlesden District Town Centre has been consolidated to Policy TCC1. The guidance for the delivering such measures is appropriate to the role of a Local Plan and provides the flexibility to consider proposals on a case by case basis in consultation with the London Borough of Brent and OPDC.
2/P11/9	Places	Continued designation of SIL at Willesden Junction Bus Depot restricts connections north and south of railways and should be removed from SIL.	1	Grand Union Alliance	<p>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:</p> <ul style="list-style-type: none"> <li>- Secures sustainable transport services to serve existing and planned growth;</li> <li>- Robust service provision supported accessibility provided by close proximity to Willesden Junction Station;</li> <li>- Employment of over 300 people with training facilities.</li> </ul> <p>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. Relevant policy components include:</p> <ul style="list-style-type: none"> <li>- requiring active and positive frontages on to the public realm</li> <li>- ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space</li> </ul> <p>OPDC will work with landowners and the Harlesden</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.
2/P11/10	Places	Consideration needs to be given to promoting early development and conserving and enhancing heritage assets, protecting existing amenity and the impact of Old Oak Sidings (Powerday) on development.	1	Grand Union Alliance	<p>Noted. The approach to conserving and enhancing heritage assets is set out in Policy D8.</p> <p>A range of policies within the Local Plan and London Plan will be implemented to ensure that new development would not cause unacceptable harm to the amenity of existing uses. The Local Plan policies include SP9, D6, EU4, EU5, EU6, P2 and P8. Policies EU6 and P2 provide guidance to ensure that waste management facilities mitigate their impact on amenity.</p>
2/P11/11	Places	Figure 4.44 does not depict a cycling route to Harrow Road.	1	Grand Union Alliance	No change proposed. A walking and cycling route to Harrow Road is illustrated in Figure 4.44 and referenced in the key.
2/P11/12	Places	Connections to Harlesden should be clearly defined.	1	Harlesden Neighbourhood Forum	Noted. The Local Plan recognises the importance of connecting with surrounding areas, including Harlesden. Policies SP7, T6 and Place Policies P2, P8, P10 and P10 set out guidance to connect Harlesden through bus services, walking and cycling to Old Oak.

## 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
2/P12/1	Places	How will biodiversity in the north of Wormwood Scrubs should be protected	1	Robert Covell	No change proposed. Biodiversity assets on Wormwood Scrubs will be protected and enhanced in accordance with policies P12 and EU2.
2/P12/2	Places	A wildlife/nature water feature could increase biodiversity value and help address flooding.	1	Robert Covell	Noted. This is reflected in Policy P12.
2/P12/3	Places	The sections of Wormwood Scrubs along the west, north and eastern boundaries are particularly valuable habitats for wildlife and woodland and require special protection.	1	Robert Covell	Noted. No change proposed. These habitats are designated as either Local Nature Reserves or Sites of Importance for Nature Conservation of Metropolitan Importance, and are identified in Policy EU2.
2/P12/4	Places	OPDC should work with wildlife groups to ascertain if a wildlife/nature reserve feature such as a pond or marshland could be delivered on the Scrubs. This could include wetlands which could support wider flood alleviation issues.	1	Robert Covell	Noted. The supporting text to Policy P12 identifies that potential future enhancements may be implemented on Wormwood Scrubs in agreement with the Wormwood Scrubs Charitable Trust and other stakeholders.
2/P12/5	Places	The labelling of Wormwood Scrubs Street on Figure 4.45 indicates that it may be located within Wormwood Scrubs itself. It is important that this is amended and the exact location clarified.	1	The Friends of Wormwood Scrubs	Change proposed. Figure 4.45 has been amended so that the label for Wormwood Scrubs Street clearly indicates the location of the street outside of the Scrubs.
2/P12/6	Places	Welcome the inclusion of the term "more wild than tamed" regarding the Wormwood Scrubs, though	1	The Friends of 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
		disappointed this is not included in the vision.			
2/P12/7	Places	Comments from the previous Local Plan consultation on enhancements and improving access to Wormwood Scrubs still apply to this version of the Plan.	1	The Friends of Wormwood Scrubs	Noted
2/P12/8	Places	Policy P12 does not place enough emphasis on the important sports function of Wormwood Scrubs, and should clearly state that the Scrubs should be protected as a playing field in addition to its other statutory protections. It should also acknowledge the role of Linford Christie Stadium, and the relationship between Stadium and activities on the Scrubs.	3	Sport England, London Borough of Hammersmith and Fulham, Wormwood Scrubs Charitable Trust	Change proposed. OPDC agrees that the sports function of the Scrubs requires greater emphasis. Additional text has been included in the supporting text of Policy P12 to highlight the role of the playing fields within the Scrubs and their protections. Although Linford Christie Stadium itself is not located within the OPDC boundary, text has also been included referencing the relationship of the stadium and activities in the Scrubs.
2/P12/9	Places	References to "sports pitches" should be amended to "playing field" to be consistent with the NPPF and to ensure that protection of playing fields under the NPPF applies to Wormwood Scrubs.	1	Sport England	Change proposed. References to "sports pitch" have been amended to "playing field".
2/P12/10	Places	The Wormwood Scrubs Charitable Trust (WSCT) has management responsibility for the Scrubs. The Council (LBHF) is sole corporate trustee. The WSCT Committee has responsibility for managing the	1	Wormwood Scrubs Charitable Trust	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
		Trust ensuring it achieves its charitable objectives.			
2/P12/11	Places	Welcome Chairman's continued support for protecting Wormwood Scrubs, but don't feel the Plan itself properly recognises it's range of habitats and land uses.	1	Wormwood Scrubs Charitable Trust	No change proposed. The Local Plan sets out and defines the habitats and uses of the Scrubs as appropriate for a strategic planning document. The Policies Map, which supports the Local Plan, provides detailed locations of relevant habitats.
2/P12/12	Places	The number and location of new access points to Wormwood Scrubs is concerning. Any access points should be described by the plan as indicative until more detailed work is undertaken to understand its biodiversity value and any potential damage new connections may cause.	2	Wormwood Scrubs Charitable Trust, Grand Union Alliance	Change proposed. All figures in the Local Plan are indicative, and this is stated in the Local Plan Appendix. This text has now been included within the introduction of the Local Plan itself for greater clarity.  Following the publication of the management plan being prepared by the Wormwood Scrubs Charitable Trust and LBHF, the location of existing routes will be updated in relevant planning guidance.
2/P12/13	Places	The Wormwood Scrubs Charitable Trust is working with LBHF on a project to improve the ecological spaces of the Scrubs, including a long-term management plan to maximise biodiversity opportunity by considering all aspects of the use of the Scrubs. This plan should be referenced in the Local plan and be in place before any proposals to improve or change the Scrubs are made. The Vision, Policy and supporting text for P12 should reference that the Scrubs will be enhanced and managed in	2	Wormwood Scrubs Charitable Trust, London Borough of Hammersmith and Fulham	Change proposed. As the management plan has not yet been published, the Local Plan cannot include it as evidence base or base policies on its contents. However, supporting text to Policy P12 will be amended to refer to the document and it's intended role and function.  When complete, the Management Plan will inform future planning guidance, including future updates 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
		accordable with the management plan.			
2/P12/14	Places	Figure 4.45 should be amended to better show the different spaces and habitats within Wormwood Scrubs, but should not show any of the existing routes through the Park as these are just desire lines and will be updated by the future management plan. The position of key routes proposed surrounding the Scrubs should be clearly marked, with the route along the southern boundary identified as a green routes.	1	Wormwood Scrubs Charitable Trust	<p>Changed proposed. The place figure for Policy P12 has been amended to show the route along the southern boundary of Wormwood Scrubs as a walking and cycling route.</p> <p>The habitats and spaces of the scrubs have been identified in the place figure in appropriate detail for a strategic planning document. The Policies Map, which supports the Local Plan, provides detailed locations of relevant habitats.</p> <p>It is considered appropriate to identify the existing routes within Wormwood Scrubs as they reflect the current movement network. Any proposals for new and/or enhanced routes within the Scrubs will be identified in the Management Plan being prepared by the Trust and this will inform future updates to the Local Plan.</p> <p>The key routes surrounding the Scrubs have been clearly identified in the current figure, including the existing key routes of Scrubs Lane, Old Oak Common Lane and Baybrook Street, and the future proposed key route of Wormwood Scrubs Street north of the Scrubs.</p>
2/P12/15	Places	A land use policy should within P12 and reflect the sensitivity of habitat and the needs identified in the GIOSSMP and other LBHF strategy documents.	1	Wormwood Scrubs Charitable Trust	No change proposed. The Local plan does not seek to deliver new development on Wormwood Scrubs given the protections that are in place, so proposed land uses are no considered appropriate within the policy. Future uses of the Scrubs will be informed by relevant evidence base studies, including the proposed 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
2/P12/16	Places	SUDS is just one way the Scrubs can contribute to Climate change resilience. Its strategic value should be in dealing with on-site flooding issues not receiving run off from other sites.	1	Wormwood Scrubs Charitable Trust	Noted. The potential for delivering strategic SuDS on to Wormwood Scrubs as sensitive interventions will only be necessary if identified to be required and agreed by the Trust.
2/P12/17	Places	Point (g) of Policy P12 on Connections should be called public realm and movement to be consistent with other Places. It should consider routes and access according to character typology as much or more than the needs of surrounding development to access the Scrubs.	1	Wormwood Scrubs Charitable Trust	Change proposed. 'Connections' is now referred to as 'Public realm and movement'. Existing text sets out the requirements for sensitive conservation and enhancements of the Scrubs, and any new routes will be required to deliver this.
2/P12/18	Places	A Heritage and Character policy should be should be included within P12 to reflect the heritage value of the Scrubs.	1	Wormwood Scrubs Charitable Trust	No change proposed. Wormwood Scrubs does not benefit from any heritage designations. OPDC's Heritage Strategy identifies Wormwood Scrubs as a heritage theme, and this is reflected in Policy D8 (Heritage).
2/P12/19	Places	Para WS5 should included less detail of the 2016 Wormwood Scrubs Survey as this will be updated and replaced by the Charitable Trusts/LBHF's Management Plan. The Management Plan should also be added to the Local Plan evidence base.	1	Wormwood Scrubs Charitable Trust	No change proposed. The Wormwood Scrubs Survey currently represents the most up to date evidence on which to inform potential improvements to Scrubs. The Management Plan is not complete and so cannot be included as part of the Local Plan evidence base. When complete, it will inform future updates to the Local Plan.  Text highlighting the role and function of the Management Plan has been included elsewhere in the supporting text to Policy P12.
2/P12/20	Places	Fig 4.45 should be more cognoscente of Fig 6.3 and Policy SP8	1	Wormwood Scrubs Charitable Trust	Change proposed. The key for the place figure to Policy P12 has been amended to highlight the existing habits as the Local Nature Reserves, as per Policy 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
2/P12/21	Places	We support the aims of the policy to improve access to Wormwood Scrubs for all Londoners.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
2/P12/22	Places	Support the retention of Wormwood Scrubs as Metropolitan Open Land and its role as a Metropolitan Park.	1	London Borough of Hammersmith and Fulham	Noted.
2/P12/3	Places	The sections of Wormwood Scrubs along the west, north and eastern boundaries are particularly valuable habitats for wildlife and woodland and require special protection.	1	Robert Covell	Noted. No change proposed. These habitats are designated as either Local Nature Reserves or Sites of Importance for Nature Conservation of Metropolitan Importance, and are identified in Policy EU2.

### ***Design Chapter***

#### **Policy D1- Securing High Quality 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
2/D1/1	Design	Welcome previous request to amend policy to engage with statutory consultees	1	Canal & River Trust	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
2/D1/2	Design	Removed paragraph referring to procurement of design teams should be reinstated.	1	Canal & River Trust	No change proposed. Policy D1 continues to require major development proposals to demonstrate use of best practice in developing project briefs. To avoid restricting procurement of design teams, OPDC considers the removal of previous paragraph 5.7 to continue to be appropriate.
2/D1/3	Design	Principles of Draft New London Plan policy D2 regarding design quality have not been included. OPDC Place Review Panel information should confirm that its role includes a design review.	1	Royal Borough of Kensington and Chelsea	No change proposed. Policy D1 is in general conformity with Draft New London Plan policy D2 and does not seek to repeat this guidance.  No change proposed. Paragraph 5.6 sets out information regarding the role of the OPDC Place Review Group in delivering design advice.
2/D1/4	Design	Greater assurance is needed that representations from community groups are not viewed to be lesser than the Community Design Review Group.	1	Grand Union Alliance	Noted. The consideration of representations of community groups on Local Plan matters will continue to be carried out in accordance with relevant legislations and OPDC's Statement of Community Involvement. The process for establishing and managing the Community Review Group is published on OPDC's website.
2/D1/5	Design	Policy D1 should require engagement with local communities to accord with the Sedley or Gunning Principles.	1	Grand Union Alliance	No change proposed. The approach to secure proactive and fair consultation and engagement for planning matters with the local community is set out in OPDC's Statement of Community Involvement. This is referenced in Policy D1.

## 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
2/D2/1	Design	The Mayor's Public London Charter has yet to be published and does not carry planning weight. Securing public access to privately owned public realm requires flexibility.	1	Old Oak Park Limited	No change proposed. Reference to the Public London Charter has been made to help demonstrate general conformity with the Draft New London Plan.  OPDC considers Policy D2 to enable sufficient provision for publicly assessable private realm to be closed for management and safety purposes while ensuring provision of open space is optimised across the OPDC area.
2/D2/2	Design	Welcome reference to delivering Healthy Streets	1	Transport for London	Noted.
2/D2/3	Design	Policy D2 should include Active Design principles.	1	Sport England	No change proposed. OPDC considers that the 10 principles of Active Design are appropriately reflected within Local Plan policies.
2/D2/4	Design	Policy should be amended to ensure the location of public realm has regard to sources of poor air quality.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU4 provides guidance to ensure buildings and spaces are designed and positioned to minimise exposure to elevated levels of pollution.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D2/5	Design	High density development, transport infrastructure and phasing of development will not enable the delivery of high quality public realm. Policy should be strengthened to enhance connections between places within and outside of the OPDC area.	1	Grand Union Alliance	<p>No change proposed. Policy D2 has been developed to provide guidance to deliver Healthy Streets and a high quality public realm within a high density context. Specific requirements of the public to address barriers created by transport infrastructure and longer-term development plots are provided in policies SP7, T1 and Place Policies.</p> <p>No change proposed. Policy SP7 and place policies provide guidance to deliver a high quality movement network that connectives the places within the OPDC area and into the surrounding areas.</p>

#### Policy D4- Well-Designed 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
2/D4/1	Design	Too many references to positive in the policy.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the use of positive to be appropriate.
2/D4/2	Design	Policy should recognise that building plants can be located elsewhere in the building.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy D4(b) provides guidance for issues specific to roof spaces. The impact of plants positioned elsewhere within a building will be managed by the remainder of policy D4 and other relevant policies and material considerations.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D4/3	Design	Supporting text to policy D4 should include detailed information for shopfront components.	1	London Borough of Hammersmith and Fulham	No change proposed. Supporting text paragraph 5.37 already provides guidance appropriate to the role of a Local Plan relating to components of shop fronts.
2/D4/4	Design	Policy is not clear how sustainability of residential developments will be assessed. Policy should clarify whether BREEAM requirement is for all development.	1	London Borough of Hammersmith and Fulham	No change proposed. Demonstrating the sustainability of residential development is guided by national and London guidance.
2/D4/5	Design	Reference to national guidance for demonstrating sustainability of residential development should be removed.	1	London Borough of Hammersmith and Fulham	No change proposed. Both national and London guidance are material considerations and will have planning weight. As such references to both is considered to be appropriate for planning purposes.
2/D4/6	Design	Policy should be amended to mitigate the impact of poor air quality on residential uses and social infrastructure.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU4 provides guidance to ensure buildings and spaces are designed and positioned to minimise exposure to elevated levels of pollution.
2/D4/7	Design	Policy D4 should require that roof spaces support amenity and security of users.	1	Grand Union Alliance	No change proposed. Roof space for amenity use is defined as private or communal open space. Guidance for delivering high quality private space is provided in Draft New London Plan Policy D4 and Local Plan Policy D6. Guidance for security of development is provided by Draft New London Plan Policy D10 and Local Plan Policy D4.

## Policy D5- 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
2/D5/1	Design	<p>The definition of a tall building in the OPDC area is not justified. The London Plan definition of 10 storeys should be used.</p> <p>Specific heights within place policies should be provided.</p>	1	London Borough of Brent	<p>No change proposed. The methodology for defining a tall building within the OPDC area is set out in OPDC's Tall Building Statement. This meets the requirements of Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. This is based on a review of Local Plan supporting studies, precedent schemes and OPDC permitted schemes. This review defines an average range of shoulder heights appropriate for the OPDC area of 8 to 12 storeys. The Draft New London Plan requires tall building definitions to relate to the evolving context. To recognise the evolving context of Old Oak and Park Royal as a high density area a range is considered to be appropriate to inform the tall building definition. The definition also makes an assumption to address site specific circumstances before reaching a height to be defined as a tall building. Site specific circumstances may include a site with a complex geometry or the need to respond to in-situ retained existing infrastructure. OPDC considers this evidence based and pragmatic approach informed by Local Plan supporting studies, precedents, permitted schemes and an assumption to recognise the area's evolving context to be justified and appropriate for the role of a Local Plan.</p> <p>Buildings heights are provided in place policies where these are supported by evidence base.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D5/2	Design	D5 should be amended to state: "Proposals for tall buildings will be supported as an appropriate form of development in principle where they:  e) Do not result in the WHO Air Quality Guideline values being exceeded from ground level to roof level for any on-site and off-site sensitive receptors"	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU4 recognises the potential impact tall buildings have on air quality and seeks to mitigate this. OPDC's 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.
2/D5/3	Design	D5 does not need to refer to undertaking proactive engagement. The policy should list the main issues of tall buildings.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers it appropriate to highlight the need to engage with stakeholders due to their prominence and interest in tall buildings.  No change proposed. The issues listed are common to all types of development. Therefore, other Local Plan and London Plan policies relating to public realm, portions of a tall building, heritage, building design, accessible and inclusive design, views, amenity and transport infrastructure will be used to manage these issues. These issues are referenced in the supporting text to D5.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D5/4	Design	Tall buildings as an appropriate form of development is at variance with the current Mayor's A City for All Londoners document. Development targets for the OPDC area pre-date the existing Mayor.	1	Grand Union Alliance	No change proposed. The current London Plan (2016) identifies that Opportunity Areas are appropriate for tall buildings and the Draft New London Plan recognises that whilst high density does not need to imply high rise, tall buildings can form part of a strategic approach to meeting regeneration and economic development goals, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. The Draft New London Plan continues to include the homes and jobs targets for the Old Oak and Park Royal Opportunity Areas from the existing adopted London Plan.
2/D5/5	Design	The proposition that tall buildings are an appropriate form of development in principle and always support legibility is contested. There are a variety of negative impacts of tall buildings which are not stated in paragraph 5.41. D5 should require proposals to demonstrate if a lower-rise alternative form is deliverable. D5 should protect amenity of surrounding communities.	2	Grand Union Alliance, Anita Ringsell	<p>No change proposed. The Draft New London Plan requires local planning authorities to identify locations where tall buildings are an appropriate form of development in principle. Policy SP9 provides guidance to ensure buildings respond appropriately to the setting of sensitive locations including heritage assets, open spaces, existing residential communities. 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. Relevant Local Plan policies include D4, D5, D6 and D8 amongst many others.</p> <p>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.</p> <p>No change proposed. Potential negative impacts of tall buildings are defined in paragraph 5.40. Policy D6 provides guidance for ensuring new development does</p>



Comment reference	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>not cause unacceptable harm to the amenity of existing uses. This is referenced in paragraph 5.43.</p> <p>No change proposed. Defining alternatives to tall buildings would not be in general conformity with the Draft New London Plan</p>
2/D5/6	Design	Removal of tall building policies that repeat the London Plan causes concern. Guidance for tall buildings in the Willesden Junction area should be provided in the Old Oak North and Scrubs Lane SPD.	1	Harlesden Neighbourhood Forum	No change proposed. The policy guidance is provided in the London Plan. Therefore, it is not considered to be appropriate to repeat policies in the Local Plan. The Old Oak North and Scrubs Lane SPD is in development at time of writing and will not provide guidance for development in the Willesden Junction area beyond illustrating connections to Harlesden.
2/D5/7	Design	<p>It is not clear how the definition of a tall building is justified in relation to the evolving context. Existing context of RBKC is not 15 storeys.</p> <p>The locations where tall buildings will be an appropriate form of development in principle will impact the setting of a number of RBKC heritage sites.</p> <p>Figure 3.145 should be amended as follows:</p>	1	Royal Borough of Kensington and Chelsea	No change proposed. The methodology for defining a tall building within the OPDC area is set out in OPDC's Tall Building Statement This meets the requirements of Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. Draft New London Plan paragraph 3.8.2 requires that in large areas of extensive change, such as Opportunity Areas, definitions of tall buildings should relate to the evolving context. This requirement has been used in the Tall Building Statement methodology for defining the height of a tall building in the OPDC area. The methodology has also considered the local context by considering the recommendations of supporting studies,

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		<ul style="list-style-type: none"> <li>- “Areas where tall buildings might be an appropriate form of development”.</li> <li>- Delete “Specific locations where tall buildings where tall buildings are an appropriate form of development in principle”</li> </ul>			<p>including the Scrubs Lane Development Framework, which respond to the local context. OPDC considers this evidence based and pragmatic approach informed by Local Plan supporting studies, precedents, permitted schemes and an assumption to recognise the area's evolving context to be justified and appropriate for the role of a Local Plan.</p> <p>Noted. Policy D8 provides guidance for conserving and enhancing the significance of designated heritage assets, including their settings. This would include heritage assets outside of the OPDC area.</p>
2/D5/8	Design	The justification for tall buildings should also make reference to benefit the wider community.	1	Royal Borough of Kensington and Chelsea	Change proposed. Paragraph 5.42 will be amended to remove to 'local' to enable communities to refer to both local and wider community.
2/D5/9	Design	The changes to Policy D8 have resulted in elements relating to place making and stakeholder engagement being removed.	1	Historic England	Change proposed. Paragraph 5.42 will be amended to include information to inform any proactive engagement process to support policy D8.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D5/10	Design	Tall building locations should be located away from sensitive locations.	1	Historic England	No change proposed. Locations where tall buildings are an appropriate form of development in principle have been defined in accordance with the methodology set out in the Draft New London Plan policy D8. These locations respond to the identified sensitive locations. Policy SP9 provides guidance to ensure buildings respond appropriately to the setting of sensitive locations including heritage assets, open spaces, existing residential communities. 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. In relation to heritage, the impact of tall buildings will be considered specifically in accordance with policy SP9 and D8 of the Local Plan and policy D8 of the Draft New London Plan.
2/D5/11	Design	Question inclusion of Draft New London Plan requirements for tall buildings	1	Royal Borough of Kensington and Chelsea	No change proposed. The approach to tall buildings within the Local Plan has been implemented to demonstrate general conformity with the Draft New London Plan.

## D6- Amenity

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D6/1	Design	Requirements to achieve amenity benchmarks in table 5.1 should be strengthened.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy text requires proposals to achieve the benchmarks for amenity set out in table 5.1 or alternatives agreed with OPDC. These are based on robust evidence base and considered to be appropriate to deliver appropriate standards of amenity.
2/D6/2	Design	Policy D6 should be amended to refer to mitigating air, light and noise pollution.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy D6 provides guidance to provide an appropriate standard of amenity. This includes air and light quality. Policy EU4 provides guidance to minimise air pollution and improve air quality.
2/D6/3	Design	Supporting text to Policy D6 should be amended to make reference to winter gardens and air quality.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy text requires that private and/or communal open spaces are located away from and/or designed to mitigate air, light and noise pollution. Private open space includes winter gardens.
2/D6/4	Design	The use of green infrastructure to address air quality issues should be referenced.	1	London Borough of Hammersmith and Fulham	Change proposed. Paragraph 6.52 is proposed to be amended to make reference to green infrastructure.
2/D6/5	Design	Policy D6 does not deliver an integrated approach or reflect recommendations of supporting studies. Additional wording is required to deliver a high standard of amenity.	1	Grand Union Alliance	No change proposed. The level of detail provided in Policy D6 for demonstrating an appropriate standard of amenity is appropriate for the role of a Local Plan. Detailed analysis of amenity at a site scale will be carried out 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
2/D6/6	Design	The Local Plan should specific minimum and recommended glazing ratios and additional façade guidance to manage internal amenity.	1	Grand Union Alliance	Noted. The level of detail set out in Policy D6 are appropriate for the role of a Local Plan. Further supplementary guidance for façade design to support amenity will be provided in forthcoming supplementary planning documents.
2/D6/7	Design	Site wide CHP networks will need to be carefully delivered and may be expensive.	1	Grand Union Alliance	Noted. Policy EU10 provides guidance to deliver energy systems
2/D6/8	Design	Sunlight requirements for the Grand Union Canal as publicly assessable open space does not provide sufficient guidance to improve the character and quality of the area. The canal should be identified as a sensitive neighbouring use for the purposes of amenity.	1	Canal & River Trust	No change proposed. The proposed approach to delivering benchmarks for amenity are defined in OPDC's Environmental Modelling Framework supporting study. The requirements for outdoor sunlight on public realm is considered to be appropriate. Combined with Local Plan policies for design, densities, heritage, land uses, biodiversity and those specific to the Grand Union Canal, OPDC considers the Local Plan provides sufficient guidance to improve the character and quality of the Grand Union Canal. The Grand Union Canal is considered to be a publicly accessible open space for the purposes of the Local Plan. Supporting text to Policy D6 confirms that publicly accessible open spaces are sensitive neighbouring uses.
2/D6/9	Design	Supporting text paragraph 5.45 to policy D6 should reinstate "will work with stakeholders to minimise negative impacts."	1	Royal Borough of Kensington and Chelsea	No change proposed. Policy D1 provides guidance for how development should engage with stakeholders in developing the design of a scheme. This would include considering amenity.
2/D6/10	Design	Agent of change policy is welcomed	1	Royal Borough of Kensington and Chelsea	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
2/D6/11	Design	Sport and recreation facilities should be included in the agent of change policy.	1	Sport England	No change proposed. Impacts of new uses on existing employment and/or town centre uses is specific to OPDC's Local Plan. Draft New London Plan Policy D12 provides guidance for implementing the Agent of Change Principle irrespective of land use.

#### Policy D7: Key Views

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D7/1	Design	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 unrelated to designated heritage assets.	1	Old Oak Park Limited	No change proposed. Policy D7 requires key views relevant to the proposal to be assessed. Paragraph 5.57 includes wording clarifying that some views may require a greater level of assessment, while some views may require less, such as kinetic views, where it would be difficult to identify a specific point to assess the view from. This guidance is considered to provide appropriate level of flexibility in determining which key views are assessed and the level of detail of the assessment.
2/D7/2	Design	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. Please refer to response to First Regulation 19 Consultation reference D7/6.
2/D7/3	Design	Any masterplanning work should consider the significance of views across the Kensal Green Cemetery.	1	Historic England	Noted. This request will be passed on to relevant OPDC officers.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D7/4	Design	Any future supplementary planning document for the Old Oak and Scrubs Lane should include an analysis of how potential massing will impact the significance of Kensal Green Cemetery.	1	Historic England	Noted. This request will be passed on to relevant OPDC officers and will be used to inform the scope of any SPD.
2/D7/5	Design	Policy D7 is unclear	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers that policy D7 is sufficiently clear.
2/D7/6	Design	Kinetic views should not require a lesser level of assessment.	1	Grand Union Alliance	Noted. Given the role and function of kinetic views, OPDC considers the approach to their assessment to be appropriate.

#### Policy D8- Heritage

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D8/1	Design	Non-designated heritage assets are given too much prominence within the policy.	1	Old Oak Park Limited	No change proposed. OPDC considers the approach to managing non-designated heritage assets accords with NPPF (2012) 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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D8/2	Design	Welcome amendment to supporting text reference relationship between heritage themes	1	Canal & River Trust	Noted.
2/D8/3	Design	Reference to securing contributions to support conservation and enhancement of heritage assets is supported.	2	Royal Borough of Kensington and Chelsea, Historic England	Noted.
2/D8/4	Design	Policy D8 relating to designated assets should be strengthened	1	Historic England	Change proposed. Policy D8(b) will be amended to require clear and convincing justification for harm to designated heritage assets
2/D8/5	Design	Policy D8 (d) should be reword to clarify requirement of delivering a Heritage Impact Assessment.	1	Historic England	Change proposed. Policy D8(d) will be amended to clarify the requirement of delivering a Heritage Impact Assessment.
2/D8/6	Design	Supporting text currently makes reference to NPPF guidance for heritage assets. Legislation should also be referenced.	1	Historic England	Change proposed. Supporting text to Policy D8 will be amended to make reference to legislation.
2/D8/7	Design	The Local Plan should reference the potential impact of development on the setting of designated heritage assets	1	Historic England	No change proposed. Policy D8 makes reference to the setting of heritage assets. Policies P2 (Old Oak North) and P10 (Scrubs Lane) provide guidance to conserve and enhance heritage assets including St. Mary's Cemetery Conservation Area and Kensal Gren Cemetery Grade I Listed Historic Park and Garde and their settings.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D8/8	Design	Registered Parks and Gardens should be referenced in first column of table 5.1	1	Historic England	Change proposed. To provide comprehensive information for designated heritage assets relevant to the OPDC area, Registered Parks and Gardens will be included in table 5.1
2/D8/9	Design	<p>Wormwood Scrubs is not designated as a conservation area or an area of local character. Therefore heritage guidance cannot be applied to Wormwood Scrubs.</p> <p>OPDC Heritage Strategy recommends further work to protect the historic core of Wormwood Scrubs.</p> <p>References to supporting studies in relation to Wormwood Scrubs are too simplistic.</p> <p>Supporting text should clarify that the Green Infrastructure and Open Space Strategy Management Plan for Wormwood Scrubs will further consider the heritage value of the Scrubs.</p>	1	Wormwood Scrubs Charitable Trust	<p>Noted. Policy D8 requires proposals to demonstrate how they respond to the OPDC heritage themes. This would apply to Wormwood Scrubs regardless of it not having a formal heritage designation.</p> <p>No change proposed. Policy D8 provides guidance for the whole OPDC area. Specific references to the Green Infrastructure and Open Space Strategy Management Plan are being provided in supporting text to Policy P12.</p>
2/D8/1	Design	Heritage assets should be retained	1	Alan Goodearl	Noted. Policy D8 provides guidance for the conservation and enhancement of heritage assets

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/D8/1	Design	St. Leonard's Conservation Area and Local Listing of the Bashley Road Metal Refinery should be removed from the Local Plan	1	SEGRO	No change proposed. OPDC's Heritage Strategy undertook a comprehensive and robust review of the historic significance of the Old Park Royal area. This recommends the designation of a conservation area around the St. Leonard's Road area based on this review. The precise boundary of the conservation area will be determined through a separate consultation process. The Bashley Road Metal Refinery is not referred to as a Local Heritage Listing reflecting the listing's draft status.
2/D8/10	Design	Alternative wording should be used to secure delivery of a replacement building within a conservation area	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers the existing text to be appropriate to secure the replacement of any building within a conservation area.
2/D8/11	Design	Part e) suggests a proposal would be support if it provides an Archaeology Impact Statement	1	London Borough of Hammersmith and Fulham	No change proposed. A proposal would be determined in accordance with all relevant development plan policies and material considerations.
2/D8/12	Design	Amendments to Policy D8 should be removed.	1	Grand Union Alliance	No change proposed. Amendments are considered to be appropriate to strengthen Policy D8 to conserve and enhance the historic environment. A significant portion of these have been developed with Historic England.
2/D8/13	Design	Object to the proposed Local Listing of The Castle Public House.	1	Citrus Group and Fuller Smith & Turner	No change proposed. Please refer to response to First Regulation 19 Consultation comment P7/10.

## Policy D9- 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
2/D9/1	Design	Requirement to deliver 0-5 years play space is publicly accessible open spaces is too restrictive.	1	Old Oak Park Limited	No change proposed. Please refer to response to First Regulation 19 Consultation reference D9/2.
2/D9/2	Design	Delivering 4 hours sunlight on 50% of play space will be challenging.	1	Old Oak Park Limited	No change proposed. Please refer to response to First Regulation 19 Consultation reference D9/3.
2/D9/3	Design	Reference to activity in Policy D9 is welcomed.	1	Sport England	Noted.
2/D9/4	Design	Policy D9b)iv should be amended to refer to noise pollution.	1	London Borough of Hammersmith and Fulham	Change proposed. Paragraph 5.72 will be amended to make reference to noise pollution.
2/D9/5	Design	<p>Design of play space should not restrict sound of play and be designed to address any noise pollution.</p> <p>Quiet play spaces should be provided.</p> <p>Roof top play space does not accord with London Plan policy.</p>	1	Grand Union Alliance	<p>Noted. Delivery of play space would need to accord with the Agent of Change Principle set out in policy D6 to manage impact of noise on existing development. Quiet spaces are referred to in supporting text to Policy EU1.</p> <p>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</p>

Comment reference	Section of Local Plan comment 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.

### *Environment and Utilities Chapter*

#### **General**

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU/General	Environment and Utilities	Climate change resilience must form the basis for all future development.	1	Grand Union Alliance	Noted. The importance of proposals delivering climate resilient development is outlined in Strategic Policy SP2, and embedded across the Local Plan policies.

#### **EU1- 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
2/EU1/1	Environment and Utilities	The requirement for 30% publicly accessible open space is excessive given the presence of Wormwood Scrubs.	1	Old Oak Park Limited	Noted. See response to comment EU1/6 from the first regulation 19 draft 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
2/EU1/2	Environment and Utilities	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 Limited	Noted. See response to comment EU1/7 from the first regulation 19 draft Local Plan.
2/EU1/3	Environment and Utilities	Support the objective to deliver a minimum 30% of developable area as publicly accessible open space, but this requirement should also apply to SIL.	1	The Inland Waterways Association	No change proposed. OPDC recognises the need for public open space in Park Royal and Policy SP8 and the Park Royal place policies have identified where new space 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.
2/EU1/4	Environment and Utilities	Welcome amendment to Policy EU1 recognising the function of open space in providing recreation and sports space.	1	Sport England	Noted.
2/EU1/5	Environment and Utilities	LBHF, as local authority provider for the maintenance and management of open space, should be party to any plans or agreements for the maintenance of open space to ensure additional costs do not occur as a result of new development .	1	London Borough of Hammersmith and Fulham	<p>Noted. Policy SP8 requires proposals to submit a Green Infrastructure and Open Space Strategy and Management Plan (GIOSSMP) where they will be expected to outline arrangements for the management and upkeep of green infrastructure provision, including longer term revenue funding. For larger public spaces, developers will be expected to consult with the relevant local authority early in the planning process to determine whether public adoption and management of new public open spaces is appropriate and/or feasible.</p> <p>Further guidance of the management arrangements for public open spaces will be included within the Planning Obligations SPD and potential other supplementary guidance.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU1/6	Environment and Utilities	Policy EU1 should be revised to remove reference to the loss of MOL being offset by provision of an equivalent quantum elsewhere. This is not considered appropriate, and is not in accordance with London Plan.	1	London Borough of Hammersmith and Fulham	<p>No change proposed. Metropolitan Open Land (MOL) benefits from the same national guidance as Green Belt, and Policy EU1 accords with the National Planning Policy Framework paragraph 88 by stating that the loss of MOL will only be permitted in very special circumstances set out in the NPPF.</p> <p>The requirement to for re-provision resulting in loss or harm to MOL in an additional requirement Policy EU1 places on relevant proposals, and will only be applied where proposals satisfy the very special circumstances required by the NPPF.</p>
2/EU1/7	Environment and Utilities	Support specific references in the Policy and supporting text to SuDS in relation to the range of functions that open space in the OPDC area should provide.	1	London Borough of Hammersmith and Fulham	Noted.
2/EU1/8	Environment and Utilities	New open spaces should also have a function of remedying deficiencies in access to open spaces for existing residential areas.	1	Grand Union Alliance	No change proposed. Policy SP8 notes that future areas of publicly accessible open space in the OPDC area will provide for the needs of people living and working in the area. This includes existing residential communities.

## Policy EU2- Urban Greening & Biodiversity

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU2/1	Environment and Utilities	Point c) should be moved to a) to give higher priority to the protection and enhancement of SINC's and similar habitats.	1	Wormwood Scrubs Charitable Trust	No change proposed. The ordering of the policy points in Policy EU2 does not reflect an order of priority or importance, or add any greater weight to how any of the policy points will be applied.
2/EU2/2	Environment and Utilities	Policy EU2 should acknowledge that urban greening is highly challenging to deliver within industrial developments, in particular the application of the Urban Greening Factor, and may not be appropriate.	1	Segro	No change proposed. Supporting text to Policy EU2 clarifies that the 0.3 score for commercial premises referenced in the draft New London Plan will not be applied to proposals within the Park Royal SIL and recognises the particular challenges in achieving this score in industrial developments. However, submission of an Urban Green Factor will be required and OPDC will work with developers to optimise their Urban Greening Factor Score.
2/EU2/3	Environment and Utilities	Support inclusion of a reference in the Policy text to integrating planting as part of SuDS systems and resilience to flooding.	1	London Borough of Hammersmith and Fulham	Noted.
2/EU2/4	Environment and Utilities	Consideration should be given to changing "green roofs" term to "living roofs" so as to encompass brown roof systems.	1	London Borough of Hammersmith and Fulham	No change proposed. The glossary definition for green roofs clarifies that it is a roof or deck onto which vegetation is intentionally grown or habitats for wildlife are created. This ensures the term does encompass brown roof systems.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU2/1	Environment and Utilities	A reference should be included to SuDS tree pits being used where possible to maximise their water management potential.	1	London Borough of Hammersmith and Fulham	No change proposed. Referencing specific SuDS features such as tree pits would be a level of detail not appropriate for inclusion in a Local Plan, but may be appropriate for future supplementary planning guidance.
2/EU2/5	Environment and Utilities	Policy should be amended to specifically reference how developments should utilise urban greening to deliver air quality improvements in accordance with the Phytosensor Toolkit, Citizen Science, May 2018 and 'First Steps in Urban Air Quality', TDAG, 2017 guidance.	1	London Borough of Hammersmith and Fulham	Change proposed. Reference to the role of urban greening in improving air quality has been included in the supporting text to Policy EU2.  References to specific guidance documents on air quality is not appropriate within Policy EU2. Policy EU4 sets out in detail in how development proposals will be expected to minimise air pollution and make a positive contribution to an overall improvement in air quality.
2/EU2/6	Environment and Utilities	Studies to understand the impacts of development on SINC's should also understand how they can be protected and enhanced as well as mitigated and minimised.	1	Wormwood Scrubs Charitable Trust	No change proposed. The requirement for development to conserve and enhance SINC's is referenced within Policy EU2.
2/EU2/7	Environment and Utilities	Protection to SINC's and other biodiversity assets should be comparable to protection of non-designated Heritage Assets Policy D8 a)-d)	1	Wormwood Scrubs Charitable Trust	No change proposed. The appropriate level of protection to be afforded to SINC's and biodiversity assets are set out in the NPPF and the London Plan. The protection is heritage assets as set out in Policy D8 are subject to separate national and regional policy guidance.



## Policy EU3- Water

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU3/1	Environment and Utilities	Thames Waters main concern is to ensure that the Local Plan delivers on the outcomes of the IWMS and to ensure that the Local Plan is sufficiently robust.	1	Thames Water	Noted.
2/EU3/2	Environment and Utilities	Currently while greenfield runoff rates are sought it is often argued that it is technically impractical to reduce surface water flows below 5 l/s as this causes blockages. However, the latest CIRIA SuDS Manual justifies that flow rates can be restricted to 2 l/s. Policy and/or supporting text should be revised to stated to reflect this.	1	Thames Water	<p>No change proposed. Policy EU3 requires developments to provide attenuation that will achieve greenfield run-off rates during a 1 in a 100 year storm plus 40% climate change allowance. Referencing specific flow rates is a level of detail not appropriate for a strategic planning document.</p> <p>OPDC will continue to work closely with Thames Water on the detailed design of SuDS in the OPDC area through its infrastructure delivery programme.</p>
2/EU3/3	Environment and Utilities	Thames Water have assessed the water infrastructure requirements of the identified site allocations. The vast majority will require local upgrades , while larger site allocations in Old Oak will require strategic infrastructure upgrades to enable development. In all instances, developers should work with Thames Water and the OPDC early in the planning process to discuss the specific issues regarding water infrastructure and how the development will	1	Thames Water	Noted. Site specific details are not appropriate for a strategic planning document such as the Local Plan. OPDC will continue to encourage developers to work with Thames Water early in the planning process to discuss specific issues relating to water 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
		contribute towards the delivery of the IWMS.			
2/EU3/4	Environment and Utilities	Specific reference could be made to the potential for the Grand Union Canal to play a role in cooling new developments.	1	Canal & River Trust	No change proposed. The potential use of the Grand Union Canal for cooling in new developments is referenced in the supporting text to Policy P3 and including additional reference to this in Policy EU3 would be repetition.
2/EU3/5	Environment and Utilities	Support the positive approach to SuDS, but query the downgrading in importance of strategic SuDS in the sustainable drainage hierarchy. The justification for this is to align with the Utilities Study, but this study has not been updated since 2017. Reference to greenfield run-off rates should be added to the supporting text to reinforce the policy.	1	Royal Borough of Kensington and Chelsea	<p>No change proposed. The hierarchy in the previous draft Local Plan was not fully consistent with either the IWMS or the findings of the 2017 Utilities Study. The revision to the hierarchy in the second revised draft Local Plan is intended to address this.</p> <p>Prioritising on-site measures for addressing surface water run-off conforms with the London Plan requirement to manage surface water run-off as close to source as possible. The hierarchy as set out in Policy EU3 reflects the particular context of the OPDC area and type and form of development to be delivered.</p> <p>Policy EU3 is clear that proposals should not exceed greenfield rates of surface water run-off.</p>
2/EU3/6	Environment and Utilities	Reference to "Thames River Basement Management Plan" should say "Thames River Basin Management Plan".	1	Royal Borough of Kensington and Chelsea	Change proposed. References to "Basement" were a typo and have been amended to "Basin".

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU3/7	Environment and Utilities	Policy and supporting text should be amended to require a site specific flood risk assessment for all development proposals within the Critical Drainage Areas identified within OPDC's IWMS.	1	Royal Borough of Kensington and Chelsea	Change proposed. The supporting text to Policy EU3 has been amended to provide additional clarity on where an FRA will be required.  The Critical Drainage Areas have also been added to the figure supporting Policy EU3.
2/EU3/8	Environment and Utilities	As part of the Healthy Streets approach, OPDC should consider what contribution it can make to delivering proposal 44 of Mayor's Transport Strategy which commits to removing 50,000 sqm of impermeable surfaces on the transport network and replacing them with permeable surfaces.	1	Environment Agency	Noted. As out set out in Policy EU3, strategic SuDS incorporated into streets, open spaces and other areas of public realm will form part of OPDC's approach to managing surface water run-off. As Old Oak is formed predominantly of hard surfaced areas at present, this will make a significant contribution towards the Mayor's target for removing impermeable surfaces.
2/EU3/9	Environment and Utilities	Policy EU3-d) should be amended to refer the specific national policy and guidance for NPPF and NPPG.	1	Environment Agency	No change proposed. The NPPF is a material consideration in assessing planning applications. It is not considered appropriate to repeat this within the policy or supporting 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
2/EU3/10	Environment and Utilities	The hierarchy set out in Policy EU3-b) should be revised to be consistent with the London Plan hierarchy and highlight the importance of rainwater harvesting and landscape based SuDS above discharge or surface water to the Grand Union Canal. The hierarchy also conflicts with recommendations of the IWMS, Borough SWMPs and the TRBM Plan.	1	London Borough of Hammersmith and Fulham	<p>No change proposed. The Local Plan is supported by, and reflects the recommendations of, a detailed Integrated Water Management Strategy (IWMS) and Utilities Study . The IWMS was jointly commissioned with the GLA who support its outputs. The studies have assessed the need to manage surface water drainage in the locally specific circumstances of the OPDC area, and this is reflected in the hierarchy set out in the Policy EU3.</p> <p>The hierarchy set out in the London Plan reflect a pan London context, and recommends that locally specific circumstances need to be considered in implementing drainage strategies. The hierarchy in Policy EU3 reflects the locally specific context of the OPDC area and the type of development set to delivered, and conforms the London Plan requirement to address surface water run-off as close to source as possible.</p> <p>Separately in Policy EU3, proposals are required to maximise the efficient use of water by delivering on-site water recycling technologies where these are shown to be viable.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU3/11	Environment and Utilities	Will the Integrated Water Management Strategy be updated, and will OPDC be producing a specific SWMP or relying on the local authorities to do so?	1	London Borough of Hammersmith and Fulham	<p>No change proposed. The IWMS is has been produced to identify options for sustainably managing water within the OPDC area to meet the changing needs of development in the area. It is considered a sound and robust evidence to support OPDC's approach to water management strategy in the Local Plan. If at any point an updated IWMS is considered necessary, the outputs will inform future updates to the Local Plan.</p> <p>Any updates to water infrastructure needs in the OPDC area will be captured through annual updates to OPDC's Infrastructure Delivery Plan.</p>
2/EU3/12	Environment and Utilities	Consider specific reference to risks of sewer flooding.	1	London Borough of Hammersmith and Fulham	No change proposed. The need for development ensure sufficient capacity within the sewerage network and address development needs is included within the Policy.
2/EU3/13	Environment and Utilities	Clarification is needed on how contributions for water infrastructure will be calculated.	1	London Borough of Hammersmith and Fulham	No changed proposed. Further details contributions for water infrastructure will be included within OPDC Planning Obligations SPD.
2/EU3/14	Environment and Utilities	Further details on the potential volumes of surface water to be directed into the canal would be useful to assess the viability of the approach.	1	London Borough of Hammersmith and Fulham	No change proposed. This is considered to be too detailed for inclusion the Local Plan. Applicants will have to demonstrate how they will comply with the requirements set out in Policy EU3, and where proposals intend to discharge into the canal, the details will require agreement with the Canal and River Trust.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU3/15	Environment and Utilities	Further consideration should be given to how off-site strategic attenuation measures will be delivered, in particular the difficulties with integrated SuDS in public highway and subsequent adoption issues.	1	London Borough of Hammersmith and Fulham	<p>No change proposed. Information on how off-site strategic attenuation measures will be delivered and criteria for their adoption is not an appropriate level of detail for the Local Plan.</p> <p>Any public highways to be adopted by the local highways authority would need to be built in accordance with the relevant adoptable standards, including drainage requirements.</p>
2/EU3/16	Environment and Utilities	Agree that Development proposals should be required to alleviate localised surface water drainage problems.	1	London Borough of Hammersmith and Fulham	Noted.
2/EU3/17	Environment and Utilities	A specific target for maximising reduction in potable water demand should be included, as it was in the previous version of the draft Plan. Targets for improving water efficiency referenced in paragraph 6.43 should also be referenced in the policy text.	1	London Borough of Hammersmith and Fulham	<p>No change proposed. The target for 105 litres is included in the London Plan, and so is not repeated in Local Plan. Reference to the Mayor's targets for domestic water use is also included in the supporting text to Policy EU3.</p> <p>The wording in the Local Plan maintains flexibility so that any amendment to the targets set out in the London Plan are amended in future.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU3/18	Environment and Utilities	Text in para 6.36 referencing Counters Creek sewer is considered misleading, as the capacity concerns relate to the sewer's catchment area and not just the single sewer itself. Text should be amended to reflect this.	1	Thames Water	Change proposed. The supporting text has been amended to refer to the Counters Creek catchment area to properly reflect the capacity concerns.

#### Policy EU4- Air Quality

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU4/1	Environment and Utilities	The Local Plan sets out the importance of open space as an integral component of a successful place making and sustainable development.	1	Canal & River Trust	Noted.
2/EU4/2	Environment and Utilities	Policy should recognise that the relevant local authorities are responsible for the management of Air Quality within their boundary, reflect policies on air quality from the boroughs Local Plans, and require that impacts of development in the OPDC area should be agreed with the relevant local authority.	1	London Borough of Hammersmith and Fulham	No change proposed. The Policy requires proposals to comply with the relevant boroughs Air Quality Action Plans (AQAPs) and the supporting text clarifies that impacts of any new development should be subject to review by the host 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
2/EU4/3	Environment and Utilities	Wording across the policy and supporting text for EU4 and TCC8 should refer to levels set out in World Health Organisation (WHO) air quality guidance for levels of NO2, PM 2.5 and PM10, rather than just national guidance. This approach is support by the Mayor's London Environment Strategy.	1	London Borough of Hammersmith and Fulham	Change proposed. Reference to the Mayor of London's commitment to achieving World Health Organisation targets has been included in the supporting text to EU4.
2/EU4/4	Environment and Utilities	Supporting text and Table 6.1 should be amended to require electric vehicle charging points for all parking spaces, including for servicing and deliveries.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy T4 (Parking) requires any proposals delivering car parking to incorporate 20% active provision and 80% passive provision electric charging points for electric vehicles at all new parking spaces. This approach reflects requirements set out in draft new London Plan and is supported by Transport for London.
2/EU4/5	Environment and Utilities	Supporting text should require the locations of new Air Quality Monitoring locations to be agreed in consultation with the relevant Local Authority, and comply with LLAQM technical guidance.	1	London Borough of Hammersmith and Fulham	No change proposed. The supporting text to Policy EU4 acknowledges that local authorities are responsible for air quality within their boundary and that the impacts of development will be subject to their review. Any proposals requiring the delivery of air quality monitoring equipment identified in Policy EU4 will be delivered in agreements with the relevant local authority. Further details of air quality monitoring equipment will be delivered and managed will be including OPDC's forthcoming Planning Obligations SPD.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU4/6	Environment and Utilities	Impact of building and plot morphology on achieving policy requirements should be referenced.	1	Grand Union Alliance	No change proposed. The requirement for proposals to design and position buildings and spaces in such a way that they do not inhibit effective pollution dispersion is included within the Policy.
2/EU4/7	Environment and Utilities	Additional traffic generated by development in the area will compound existing air quality issues and render the policy ineffective.	1	Grand Union Alliance	No change proposed. Strategic Policy SP7, and the transport policies of chapter 7, outlines how development proposals should support the delivery of OPDC's Sustainable Transport Hierarchy. This discourages the use of private motorised vehicles and limits car parking and prioritises sustainable modes of transport.
2/EU4/8	Environment and Utilities	Specific reference to the need for different types of development to mitigate air quality pollution and be oriented away from the main sources of poor air quality should be included in policies across the Local Plan, including D4, D6, E6, TCC4, and TCC6.	1	London Borough of Hammersmith and Fulham	No change proposed. The need for development to appropriately minimise air pollution and to be designed in such a way as to minimise exposure to elevated levels of air pollution is required through Policy EU4. Including references to this across multiple policies would result in repetition.
2/EU4/9	Environment and Utilities	Welcome additional wording regarding canyoning effect, though it does not fully address previous concerns raised on the potential for canyoning along the Grand Union Canal.	1	Canal & River Trust	No change proposed. Guidance for massing and enclosure along the Grand Union Canal is provided in Policy P3.

## Policy EU6- Waste

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU6/1	Environment and Utilities	Provided comments on the previous consultation.	1	North London Waste Plan	Noted. See responses to EU6/20, EU6/21 and EU6/34 from the first regulation 19 draft Local Plan.
2/EU6/2	Environment and Utilities	Welcome the Waste in tall buildings study as a contribution to improving performance in this area. This could be referenced in EU6 instead of LWARB guidance.	1	North London Waste Plan	Noted. No change proposed. A waste in high-density development SPD will be produced that will give additional guidance on this policy.
2/EU6/3	Environment and Utilities	A pooling arrangement with Western Riverside boroughs should be considered.	1	North London Waste Plan	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 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 comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU6/4	Environment and Utilities	Question assumptions for Powerday site.	1	North London Waste Plan	Noted. See response to comment EU6/20 from the first regulation 19 draft Local Plan.
2/EU6/5	Environment and Utilities	Policy EU6 does not make extra provision for or consider new ways to collect and store waste on site, enforcement mechanisms for effective waste collection and promoting higher recycling despite focus on high density and tall buildings. This is storing up waste management problems for the future which will cause serious problems for Old Oak's existing areas (Club House Goodhall/Stephenson street, given as example of the problem). Want to see a far more strategic and practical and accountable policy in the Local Plan. Policy EU6 is ineffective and unsound.	21	Nye Jones; Gail Dobinson; Rachel Ritfeld; Ciara Solmi; Bernie Timmins; M. Szoke; James Trew; Eileen Hannington; Marta Donaghey; Jamie Sutcliffe; Pablo Navarrete; Midland Terrace Residents; Pendle Harte; Jason Salkely; David Turner; Nicky Guymer; TITRA; Natasha Salkey; Jane Dreaper; Mark Walker; Elaine Gristock	<p>No change proposed. Policy EU6 requires a Site Waste Management Plan to be submitted and this will demonstrate how the Mayor's waste targets will be achieved and how waste will be stored and collected as part of development proposals. OPDC will be developing a waste in high density development SPD to help inform on site storage of waste.</p> <p>It is not the role of the Local Plan to set out enforcement mechanisms or to determine specific approaches to waste collection. This is the responsibility of the Waste Collection Authority.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU6/6	Environment and Utilities	The policy documentation does not discuss local authorities such as Ealing Council's failure to enforce effective segregation of waste and recyclable material on its part of the Old Oak development zone/existing HMO. If an under-funded local authority cannot manage waste and enforce controls then it is highly inappropriate for the Local Plan to be advocating development on this scale without fresh thinking on waste management and its control.	5	Rachel Ritfield; James Trew; Eileen Hannington; TITRA; Mark Walker	<p>No change proposed. Policy EU6 requires a Site Waste Management Plan to be submitted and this will demonstrate how the Mayor's waste targets will be achieved and how waste will be stored and collected as part of development proposals. OPDC will be developing a waste in high density development SPD to help inform on site storage of waste.</p> <p>It is not the role of the Local Plan to set out enforcement mechanisms or to determine specific approaches to waste collection. This is the responsibility of the Waste Collection Authority.</p>
2/EU6/7	Environment and Utilities	Object to the safeguarding and expansion of waste management capacity on the Powerday site at Old Oak Sidings, including allowing more biological material to be treated on site. The site has negative impact on the area. Another waste management option must be found. Policy EU6 is ineffective and unsound.	5	Natasha Salkey; TITRA; Nicky Guymmer; Liz Abraham; Alessia Stevani	<p>No change proposed. The Mayor's London Plan requires Local Plans to identify land/facilities to meet waste apportionment targets, and expects this to include protecting and facilitating the maximum use of existing waste sites. Powerday is required to meet LBHF's waste apportionment targets and therefore it will continue to be protected as a waste management 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, policies D6, EU4, EU5, EU6 and relevant place policies seek to ensure future proposals adequately mitigate their impact on amenity.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU6/8	Environment and Utilities	Welcome the amendment relating to the Quattro site in Acton Wells, which is safeguarded in the West London Waste Plan. Would like to place on record that they are actively seeking an alternative site so that the Quattro landholding can be comprehensively planned.	1	Osbourne Investments Limited and Quattro Holdings Limited	Noted.
2/EU6/9	Environment and Utilities	Various amendments have been made to this policy following the last consultation, many of which are welcomed, and in part go some way to addressing our earlier concerns. Despite these changes, there remain a number of outstanding and in principle concerns. These comments should be read alongside our earlier comments submitted in September 2017 and March 2018.	1	London Borough of Ealing	Noted. See responses to comments EU6/8, EU6/9, EU6/10, EU6/11, EU6/12, EU6/38, EU6/39 and EU6/40 from the first regulation 19 draft 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
2/EU6/10	Environment and Utilities	Against the new and significantly higher apportionment targets in the new Draft London Plan, insufficient sites are now allocated or safeguarded within the West London Waste Plan, or through OPDCs Local Plan. Merely safeguarding such sites then through policy EU6 fails to properly grapple with the challenge.	1	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 already been updated to recognise that a Draft New 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 Draft New London Plan does not propose a separate apportionment target for OPDC and OPDC is supportive of this approach.
2/EU6/11	Environment and Utilities	Ealing has made representations to the GLA requesting that apportionment targets should be set for all authorities including the MDCs. The Council's ability to plan for this apportionment through utilising a significant area of this land to accommodate future waste facilities now no longer exists following the transfer of planmaking powers to the OPDC. The ability to utilise this capacity and to allocate new waste sites in this area now resides solely with the OPDC. To assign this responsibility to Ealing through the apportionment is in our view neither justifiable nor deliverable. Believe that there is a real possibility that the GLA will need to	1	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 already been updated to recognise that a Draft New 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 Draft New London Plan does not propose a separate apportionment target for OPDC and OPDC is supportive of this approach.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		rectify this position in the London Plan, and the consequence of this is that the OPDC Local Plan will either fail to conform with the London Plan, or if adopted ahead of the London Plan, will be out of date shortly thereafter.			
2/EU6/12	Environment and Utilities	In respect of compensatory provision clause 'b' now recognises that alternative replacement provision should be made in the OPDC area in the first instance, which is a welcome addition. Despite this, this policy continues to promote a sequential approach, which could ultimately depend on sites beyond OPDC's boundaries, and for which it has no locus. It is also unclear how this would be secured/managed in practice.	1	London Borough of Ealing	No change is proposed. Applicants will be required to demonstrate appropriate compensatory provision is in place. For example, deliverability could be demonstrated through confirmation of the availability of a site for development, demonstrating suitability of the alternative site through confirmation of planning consent.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU6/13	Environment and Utilities	The text here has been revised to advise that compensatory provision should be sufficient to meet the maximum throughput that the lost site achieved. Previously the plan advised that compensatory provision should be equivalent to the potential throughput which could be achieved on a site. The earlier text in this respect is preferred and necessary.	1	London Borough of Ealing	Change proposed. Policy has been amended to refer to the maximum throughput the site could achieve.
2/EU6/14	Environment and Utilities	To futureproof the plan, and in the event that an allocated site is not an existing waste site, the policy should apply to both existing and allocated waste sites.	1	London Borough of Ealing	Change proposed. Policy has been amended to refer to allocated waste sites.
2/EU6/15	Environment and Utilities	An existing site is missing from Ealing's area – O C S Group Ltd, Unit 2 and Yard, Sovereign Park. A GIS layer with boundaries for each site including this one will be sent by separate cover.	1	London Borough of Ealing	Change proposed. Figure 6.7 has been amended to reflect list of sites identified in the West London Waste Plan.
2/EU6/16	Environment and Utilities	A more strategic approach to the relocation and re-provision of the European Metal Recycling site is necessary, as this has been allocated for housing. It is one of a few sites that is able to legally	1	Environment Agency	Noted. Applicants will be required to demonstrate appropriate compensatory provision is in place. For example, deliverability could be demonstrated through confirmation of the availability of a site for development, demonstrating suitability of the alternative site through confirmation of planning consent.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		dispose certain types of waste and if that facility is not replaced we envisage there being a high risk of increased illegal disposal or flytipping of these materials. This could be on the site or elsewhere in London and the southeast of England. Acknowledge that this is not necessarily for you to resolve in isolation but we encourage you take a collaborative approach and begin discussions with us and relevant stakeholders on this topic in good time.			
2/EU6/17	Environment and Utilities	In terms of innovative waste collection facilities, LBHF wish to be involved in future discussions on options for waste collection systems as part of new major developments proposals.	1	London Borough of Hammersmith and Fulham	Noted. OPDC will engage LBHF in any proposals to develop innovative waste collection systems.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU6/18	Environment and Utilities	<p>Food waste collection service should be considered in all aspects of the development including provision of the appropriate storage space. Its likely that LBHF will have food waste collection in operation over the OPDC Local Plan period.</p> <p>LBHF wish to be involved in any future waste SPD guidance.</p>	1	London Borough of Hammersmith and Fulham	Noted. No change proposed. Policy EU6 does require adequate provision for the segregation of bio-waste and other recyclables in development in anticipation that food waste will be collected separately.
2/EU6/19	Environment and Utilities	<p>Lambeth, along with Kensington &amp; Chelsea and Wandsworth, aimed to plan for waste jointly across the Western Riverside area by pooling capacity and apportionment targets and formalise this agreement through an MoU. Hammersmith &amp; Fulham and the OPDC have resisted planning for waste collectively. LBH&amp;F and OPDC have said they are unable to commit to pooling with the Western Riverside WPAs until further work is done. We have not received any update on this work to date and look forward to a progress report.</p>	3	London Boroughs of Lambeth and Wandsworth and the Royal Borough of Kensington and Chelsea	<p>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 Draft New 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</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					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.
2/EU6/20	Environment and Utilities	Planning for waste management is a strategic (crossborough) matter and subject to the legal requirement of the Duty to Cooperate. We then pointed out that OPDC's strategy for waste is an impediment to joint waste planning across the Western Riverside area. Surprised that there has been no contact from OPDC about these comments since they were made.	3	London Boroughs of Lambeth and Wandsworth and the Royal Borough of Kensington and Chelsea	Noted. See responses to EU6/28, EU6/29, EU6/30, EU6/31, EU6/32, EU6/33 from the first regulation 19 draft Local Plan.
2/EU6/21	Environment and Utilities	Should note supporting text in para 9.8.7 of new draft London Plan. Early suggested changes on the draft new London Plan are expected in August and we hope the responsibility of MDCs to work collaboratively in groups with other waste planning authorities is clarified.	3	London Boroughs of Lambeth and Wandsworth and the Royal Borough of Kensington and Chelsea	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
2/EU6/22	Environment and Utilities	Support Para 6.73	1	London Borough of Hammersmith and Fulham	Noted.
2/EU6/23	Environment and Utilities	Support Para 6.85 & point c iii)	1	London Borough of Hammersmith and Fulham	Noted.

#### Policy EU7- Circular and Sharing 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
2/EU7/1	Environment and Utilities	The policy is onerous, is beyond what is required elsewhere in London or nationally, and not appropriate for inclusion in a Local Plan. Sustainability policies should be proportionate and appropriate when viewed alongside other requirements.	1	Old Oak Park Limited	Noted. See response to comment EU7/5 from the first regulation 19 draft Local Plan.
2/EU7/2	Environment and Utilities	Support approach to the circular economy.	1	Environment Agency	Noted.

#### Policy EU8- Sustainable Materials

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU8/1	Environment and Utilities	Support Policy EU8 (Sustainable Materials).	1	London Borough of Hammersmith and Fulham	Noted.

#### Policy EU9- Minimising Carbon Emissions and Overheating

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU9/1	Environment and Utilities	Clarification should be provided on the timeframes envisaged for monitoring of CO2 emissions, and what actions would take if a development is not meeting the required CO2 emission targets.	1	London Borough of Hammersmith and Fulham	No change proposed. The draft new London requires major developments to monitor and report on energy performance to the Mayor for at least five years.  Further clarity on how OPDC's approach to monitoring CO2 emissions new developments will be included in the forthcoming Post Occupancy Evaluation SPD. Further details on obligations where development does not achieve the agreed CO2 emission targets will be included within OPDC's forthcoming Planning Obligations SPD.
2/EU9/2	Environment and Utilities	Support the development of guidance on the carbon offset scheme to be implemented in the OPDC area.	1	London Borough of Hammersmith and Fulham	Noted.
2/EU9/3	Environment and Utilities	Requirement for Post Occupancy Evaluations are welcomed, but they should also monitor issues relating to landscape and public realm.	1	Grand Union Alliance	Noted. No change proposed. The Post Occupancy Evaluations will include monitoring of landscape and public realm. OPDC is preparing an SPD on Post Occupancy Evaluations which provide greater details on the requirements of development and issues to be monitored.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU9/4	Environment and Utilities	Environmental targets set out by OPDC and the Mayor may not be met due to the proposed density of development.	1	Grand Union Alliance	No change proposed. Policy SP2 (Good Growth) sets out how development is expected to deliver high density, high quality development by meeting or exceeding the environmental standards set out across the Local Plan. The supporting text to Policy SP2 acknowledges that these standards will be difficult to meet and that regard would be given to the viability of development in line with Policy DI1.

#### Policy EU10- Energy Systems

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU10/1	Environment and Utilities	Policy should recognise that some energy generating technologies, including low carbon solutions, can have an unacceptable impact on local air quality. Where a proposed system is considered to have an unacceptable impact in this respect, alternative energy systems should be used.	1	London Borough of Hammersmith and Fulham	No change proposed. The need for development to minimise emissions from combustion based sources of energy is addressed within Policy EU4 (Air Quality).
2/EU10/2	Environment and Utilities	Details of indicative heat network and energy centre locations should be included in the plan, if known.	1	London Borough of Hammersmith and Fulham	No change proposed. The indicative locations for future energy centres are identified in the Infrastructure Delivery Plan, which will be updated on an annual basis. If, or when, more details of future energy networks become available this will be captured as part of future updates to 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
2/EU10/3	Environment and Utilities	Support the principle of district heating and cooling systems, but question how this will be funded.	1	Grand Union Alliance	Noted. No change proposed. OPDC is working with relevant stakeholder to identify funding for strategically planned district energy networks, and will seek financial contributions through Section 106 Planning Obligations and/or CIL. Further details will be provided as part of OPDC's Planning Obligations SPD , and details of other potential funding sources will be included in future updates to OPDC's Infrastructure Development Plan.

#### Policy EU11- Smart Technology

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/EU11/1	Environment and Utilities	Question the appropriateness of including a policy relating to technology in the Local Plan. It is not the responsibility of the planning system to govern broadband speeds etc and will increase the costs of development.	1	Old Oak Park Limited	Noted. See response to comment EU11/12 from the first regulation 19 draft Local Plan.

**Policy EU12- Extraction of Minerals**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/EU12/1	Environment and Utilities	Point f) should also refer to the need to mitigate Nox emissions.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy EU12 already requires development to adequately to mitigate the effects of the operation iwith regards to air quality.

**Policy EU13- Land Contamination**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/EU13/01	Environment and Utilities	Satisfied that no further changes are necessary to Policy EU13.	1	London Borough of Hammersmith and Fulham	Noted.



## Transport Chapter

### 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
2/T3/Intro	Transport	Welcomes the additional references to the Mayor's mode share targets, the need to manage construction transport and support for sustainable freight and servicing	1	Transport for London	Noted.

### Policy T1- Roads and Streets

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T1/1	Transport	Support for policy.	1	Imperial College	Noted.
2/T1/2	Transport	Add "by design features and signage" to T1(f).	2	John Cox, Grand Union Alliance	No change proposed. The level of detail is appropriate to the role of a Local Plan.
2/T1/3	Transport	Local Plan should have cross-sections of the proposed new streets.	1	West Twyford Residents Association	No change proposed. This level of detail is not considered appropriate for the strategic 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
2/T1/4	Transport	Streets should be defined as any route or clarification should be provided in the text to deliver Healthy Streets principles. Important that contractual rights of way, and management/maintenance responsibilities are established from the outset for all routes and connections.	1	Transport for London	Change proposed. Supporting text to T1 will be amended to confirm the Healthy Streets Approach will be applied to non-vehicular routes.
2/T1/5	Transport	TfL suggests that this should read 'minimise and mitigate the impact.	1	Transport for London	No change proposed. OPDC considers the current wording to be sufficient to address the impacts of development on the surrounding movement network.
2/T1/6	Transport	TfL welcomes references to the Healthy Streets Check for Designers tool and the TfL Streets Toolkit.	1	Transport for London	Noted.
2/T1/7	Transport	Compatibility with LBHF's highways requirements and Streetsmart Guidance. Request that Streetsmart is referenced in D2.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC and LBHF are currently exploring the development a joint adoption strategy for streets and relevant portions of the public realm. Subject to the outcomes of this work, future OPDC planning guidance will be make reference to any relevant public realm guidance.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T1/8	Transport	Greater recognition and involvement of LBHF in the OPDC regeneration project as a whole, including the development of transport networks within the OPDC area and connections to the wider area.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy T1 sets out the need to work in collaboration with the highways authorities. Policies throughout the plan provide guidance and set out aspirations for working with the London Borough of Hammersmith and Fulham to deliver the policies of the Local Plan.
2/T1/9	Transport	No policy to secure funding for future maintenance of new public highways.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy DI1 sets out guidance for securing infrastructure to support development.
2/T1/10	Transport	A road adoption strategy should be considered.	1	London Borough of Hammersmith and Fulham	Change proposed. Policy T1 and supporting text will be amended to require that streets are offered to local highways authorities for adoption.
2/T1/11	Transport	Reference to SuDs should be made in the transport chapter.	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for SuDs is provided in policy EU3.
2/T1/12	Transport	Policy links should include reference to Policy EU4 - Air Quality.	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance to improve air quality is provided in policy EU4.
2/T1/13	Transport	20mph policy for existing roads is for highway authority to decide.	1	London Borough of Hammersmith and Fulham	Change proposed. Supporting text to policy T1 will be amended to state that it will seek 20mph speed limits across the OPDC area in consultation with the Local Highway Authorities

### Policy T2- 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
2/T2/1	Transport	LBHF does not support use of Legible London throughout OPDC area. It is unnecessary in residential areas.	1	London Borough of Hammersmith and Fulham	No change proposed. Legible London wayfinding signage is considered to be appropriate for the Old Oak area in light of the envisaged character and range of destinations within and around the area. This accords with the Mayor's Transport Strategy. Policy T2 requires development to make appropriate contributions to the delivery of Legible London signage.
2/T2/2	Transport	TfL welcomes changes and additions to the map in response to previous comments.	1	Transport for London	Noted.

### Policy T3- 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
2/T3/1	Transport	The density and arrangement of cycling provision is in adequate	2	John Cox, Grand Union Alliance	No change proposed. The cycle network is based on recommendations of the Public Realm, Walking and Cycling Strategy to meet the demands of the development.
2/T3/2	Transport	Provide additional wording to Policy T3(c) to ensure new cycle networks to connect into the wider existing network	2	John Cox, Grand Union Alliance	No change proposed. T3 c) provides appropriate guidance for connecting new cycle routes with surrounding existing routes. It is also illustrated in figure 7.7

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T3/3	Transport	Segregated cycle facilities should be specified in Local Plan	2	John Cox, Grand Union Alliance	No change proposed. The supporting Infrastructure Delivery Plan specifies segregated cycle facilities where feasible and appropriate
2/T3/4	Transport	Concern about capacity of the towpath along the canal. Already well used by commuters.	1	The Inland Waterways Association	No change proposed. The Local Plan proposes adding a cycle route along the southern towpath - subject to feasibility and where appropriate. The capacity of the towpath will be a key parameter in its redesign.
2/T3/5	Transport	Lack of other east west corridors within the area other than the canal and the A40.	1	The Inland Waterways Association	No change proposed. The Local Plan proposes new physical links as well as amended bus routes to improve east-west travel in the area.
2/T3/6	Transport	Welcome the segregated cycle lane on the south side of the canal but concerned about the caveats 'where feasible and appropriate'.	1	The Inland Waterways Association	No change proposed. The Local Plan proposes adding a cycle route along the southern towpath - subject to feasibility and where appropriate. The capacity of the towpath will be a key parameter in its redesign.
2/T3/7	Transport	Welcome the proposed walking and cycling route along the north side of the canal.	1	The Inland Waterways Association	Noted.
2/T3/8	Transport	Why has the following line been deleted "OPDC will also work with TfL to enhance the [cycle hire] network in this area"	1	West Twyford Residents Association	This was considered to repeat similar wording in the supporting text to policy T3.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T3/9	Transport	Supports the requirement for cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the minimum standards set out in the draft new London Plan.	1	Transport for London	Noted.
2/T3/10	Transport	TfL supports the requirement for cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the minimum standards set out in the draft new London Plan	1	Transport for London	Noted.
2/T3/11	Transport	Greater emphasis should be given to the importance of providing adequate cycle parking capacity and high quality facilities at new and existing stations	1	Transport for London	Change proposed. Policy T3(e) will be amended to refer to cycling infrastructure.
2/T3/12	Transport	To ensure independent cycle hire operations are complementary to TfL Cycle hire, wording should be amended to: 'deliver and/or contribute towards the provision of cycle hire across Old Oak and Park Royal which may include complementary local cycle hire operations'	1	Transport for London	Change proposed. T3(h) will be amended to ensure independent cycle hire operations should complement TfL cycle hire schemes. This is already reflects in paragraph 7.27.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T3/13	Transport	Dockless bikes should be referenced in policy T3 re requirements for operators to enter into an agreement with the Highways Authority.	1	London Borough of Hammersmith and Fulham	Change proposed. Supporting text to Policy T3 will be amended to require consultation with Local Highways Authorities.
2/T3/13	Transport	Welcomes changes and additions to the map in response to previous comments	1	Transport for London	Noted.
2/T3/14	Transport	Shows existing Quietway in the wrong place	1	Wormwood Scrubs Charitable Trust	Change proposed. Correct location of Quiet Way on Wormwood Scrubs will be shown.
2/T3/15	Transport	If the OPDC is seeking to exceed London Plan Cycle parking standards, what is being proposed?	1	London Borough of Hammersmith and Fulham	No change proposed. Paragraph 7.26 sets out the potential approach to exceeding London Plan minimum standards.

#### Policy T4-Parking

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T4/1	Transport	Policy should differentiate between commuters and freight/customer parking.	1	John Cox	No change proposed. The Local Plan Policy does differentiate as it allows for limited car parking where it can be justified for operational or business needs and when access to public transport are taken into account.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T4/2	Transport	No new day-long parking should be provided and the removal of existing provisions where possible should be carried out in Park Royal.	1	John Cox	No change proposed. The Local Plan is for new development and the parking standards proposed are stringent.
2/T4/3	Transport	To encourage visitors to Park Royal to use public transport, low or no-car commercial intensification should be encouraged.	1	John Cox	Noted. Policy P4 and T4 supports this approach.
2/T4/4	Transport	Concern about insufficient car parking for healthcare and school staff.	1	Diocese of London	No change proposed. Policy T4 provides flexibility for providing limited car parking for non-residential uses.
2/T4/5	Transport	Need for programmes to encourage the use of good value electric cars. Concerned that the car-free zone is penalising elderly, disabled, people with children and visiting carers.	2	Thomas Dyton, Wells House Road Residents Association	No change proposed. The OPDC is requiring 20% of all new car parking to have active provision for electric vehicle charging.
2/T4/6	Transport	Car-free/low car policy puts greater need on new/enhanced infrastructure along the canal.	1	The Inland Waterways Association	No change proposed. Local plan proposed adding a cycle route along the southern towpath as well as a footpath along the northern side.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T4/7	Transport	Local Plan should state that 'coaches can be large double decker vehicles and any design should accommodate that size'	1	West Twyford Residents Association	No change proposed. This level of detail is not considered appropriate for the strategy role of a Local Plan.
2/T4/8	Transport	Supports the overall approach of limiting car parking and encouraging car free development. TfL also supports the requirement for 80% passive provision for electric car parking spaces as well as 20% active provision.	1	Transport for London	Noted.
2/T4/9	Transport	Supports the overall approach of limiting car parking, encouraging car free residential development and requiring car free non residential development. Car free development should be the presumption as outlined in the draft new London Plan.	1	Transport for London	Noted.
2/T4/10	Transport	Welcomes the reference to requirements for submission of Parking Design and Management Plans as set out in the draft new London Plan	1	Transport for 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
2/T4/11	Transport	Supports OPDC's policy to promote 80% passive provision for electric car parking spaces as well as 20% active provision which is now a requirement of the draft new London Plan.	1	Transport for London	Noted.
2/T4/12	Transport	Welcomes the caveat 'where appropriate' when referring to car club provision because it is more relevant in areas with lower PTALs where car use may be more necessary.	1	Transport for London	Noted.
2/T4/13	Transport	Parking standards should align with Draft New London Plan standards of car free development.	1	London Borough of Hammersmith and Fulham	Change proposed. Policy T4 will be amended to reflect updated London Plan requirements in relation to existing areas of PTAL 4-6. Existing wording will continue to be retained for those areas expected to become PTAL 4-6.
2/T4/14	Transport	20% active provision of electric vehicle charging parking spaces is different to LBHF's Local Plan policy of 25%	1	London Borough of Hammersmith and Fulham	No change proposed. 20% requirement accords with the Draft New London Plan policy T6.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T4/15	Transport	When providing car parking, development proposals should include appropriate provision for zero tailpipe emission car club vehicles and facilities to cater for anticipated demand for coaches and zero emission taxis	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for improving air quality is provided in policy EU4.
2/T4/16	Transport	Paragraph 7.34 should be amended as follows:  "To encourage the uptake of zero tailpipe emission vehicles and ensure that the Old Oak and Park Royal area is an exemplar of low carbon development..."	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for improving air quality is provided in policy EU4.
2/T4/17	Transport	Paragraph 7.32 to be amended as follows:  "A network of Zero tailpipe Emission car club bays spread across the site will provide a convenient, cost-effective and attractive alternative to owning a private car and will support the optimal use of space (see Policy EU7). Car club bays will need to be designed into the new development areas from the outset. The Zero tailpipe Emission Car club bays should be designed in such a way that they can be	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for improving air quality is provided in policy EU4.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		adapted for different uses in the future.”			
2/T4/18	Transport	Welcomes the additional text which confirms that OPDC will work with TfL Taxi and Private Hire and other commercial operators such as car clubs as well as exploring options for rapid electric vehicle charging for freight vehicles	1	Transport for London	Noted.
2/T4/19	Transport	Welcomes the additional text that confirms how coach, taxi and PHV facilities will be provided	1	Transport for London	Noted.

#### Policy T5- Rail

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T5/1	Transport	Overground stations should be located as close to Old Oak Common Station as possible.	1	Chris Bell	No change proposed. This suggestion has been put forward during the HS2 Phase 1 Hybrid Bill process as well as during TfL's Overground GRIP 2 study. In both instances, the option for incorporating Overground Stations within the HS2/Crossrail station complex was discounted for reasons of feasibility.
2/T5/2	Transport	Trains shouldn't terminate in Old Oak.	1	Chris Bell	Noted. HS2 trains will terminate at Euston.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T5/3	Transport	Acton Main Line branch could provide an alternative route connecting from the Crossrail / Great Western services, and Heathrow, towards the north of London.	1	Chris Bell	No change proposed. Acton Mainline station is outside of OPDC's boundary.
2/T5/4	Transport	Relocation of western Overground station to Acton Wells area.	1	Chris Bell	No change proposed. Old Oak Common Lane Overground station is being planned and proposed by TfL. TfL explored a range of options for the appropriate position of the station and this was decided to be the most appropriate.
2/T5/5	Transport	New station to allow transfers between Crossrail and Dudding Hill Line	1	Chris Bell	No change proposed. OPDC is working with TfL and the West London Alliance to investigate the potential West London Orbital route and the most appropriate way for it to serve Old Oak and Park Royal and to enable an interchange with other services in the area.
2/T5/6	Transport	Use of the proposed Chiltern Line extension through North Acton to increase services between Old Oak Common and Central London	1	Chris Bell	No change proposed. The proposed Chiltern Line extension is shown in Policy P7.
2/T5/7	Transport	More direct pedestrian routes between Victoria Rd/North Acton and Old Oak should be provided.	1	Chris Bell	No change proposed. The Local Plan sets out new walking and cycling routes across the OPDC area.
2/T5/8	Transport	HS2 trains to Gatwick/Brighton should be provided.	1	Chris Bell	No change proposed. It is not the role of the Local Plan to provide guidance for delivery high speed train 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
2/T5/9	Transport	Other train operating companies must be able to use the new Overground stations and the platforms must be at least 8-car long.	1	John Cox	Noted. This is not a matter for the Local Plan.
2/T5/10	Transport	Provision of station(s) on the Dudding Hill Line aren't proposed.	2	John Cox, Grand Union Alliance	No change proposed. The Policy P7 provides guidance to safeguard land to facilitate the delivery of the West London Orbital Route. This reflects the current stage of development proposals for a station.
2/T5/11	Transport	8 car long platform locations need to be protected at Harlesden Station for future use.	1	John Cox	No change proposed. This is not a matter for the Local Plan.
2/T5/12	Transport	The following rail links should be shown - - link from GWML (east of Acton Mainline) to the North London Line - West London Line chord to westbound WCML - North London Line chord to westbound WCML	1	John Cox	No change proposed. These proposals have not been recommended by OPDC's transport supporting studies as being required to support the needs of development in the OPDC 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
2/T5/13	Transport	Dismantled freight railway lines need to be recognised and surviving land protected.	1	John Cox	No change proposed. The Park Royal Transport Strategy points to the WestTrans Freight Strategy for West London and Network Rail's Freight Network Study which will be used to inform future rail freight planning and will include the existing rail freight facilities in the OPDC area.
2/T5/14	Transport	When will the 'potential' Overground stations be confirmed or not?	1	West Twyford Residents Association	Noted. The proposed Overground stations at Old Oak Common Lane and Hythe Road are planned to be delivered by 2026 to coincide with the opening of Old Oak Common station. TfL is currently working with partners including HS2, Network Rail and OPDC to confirm a funding package for the stations.
2/T5/15	Transport	Will HS2 terminate at Old Oak Common initially whilst Euston is completed?	1	West Twyford Residents Association	Noted. HS2 services are identified to terminate at Euston.
2/T5/16	Transport	Will alighting passengers continue their journey by road?	1	West Twyford Residents Association	Noted. Old Oak Common Station passengers will be able to access the full range of transport modes at the station.
2/T5/17	Transport	Retaining operational rail facilities is important in maintaining and improving transport services into the future both within the area and further afield.	1	Transport for London	Noted. This is reflected in the Local Plan now not including depot sites within 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
2/T5/18	Transport	Integration of Overground stations within HS2/Crossrail/GWML station to reduce impacts on surrounding area/central London should be included. If not, then assisted movement between the stations should be required.	1	Alan Goodearl	No change proposed. The Local Plan provides a range of guidance to deliver efficient interchange journeys between stations.
2/T5/19	Transport	Point d of T5 should be amended as follows:  “d) appropriately manage the demands of competing transport modes and interchange requirements for walking, cycling, Zero tailpipe Emission buses and taxis, ensuring adequate space is provided and embedded into the public realm”;	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for improving air quality is provided in policy EU4.
2/T5/20	Transport	Paragraph 7.40 should be amended as follows:  “....This should include provision of direct and legible step-free access from the station to appropriately sized and well located walking, cycling, zero tailpipe emission bus and taxi and drop off infrastructure...”	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for improving air quality is provided in policy EU4.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T5/21	Transport	Concern about the lack of democratic input into the design and planning of the HS2 stations at Old Oak	1	Grand Union Alliance	Noted. The Outline Planning permission granted through the HS2 Phase 1 Hybrid Bill planning process has granted HS2 powers to build the station at Old Oak. This was a democratic process in which the local authorities and local residents were able to petition for changes to be made to the scheme proposals.
2/T5/22	Transport	Welcomes the clarification with use of the of the word 'potential' when referring to London Overground stations to better reflect their current status	1	Transport for London	Noted.
2/T5/23	Transport	TfL welcomes the addition of the word 'potential' when referring to London Overground stations to better reflect their current status	1	Transport for London	Noted.
2/T5/24	Transport	TfL welcomes the amended wording which allows flexibility in how the public realm around the station will be designed	1	Transport for London	Noted.

## Policy T6- Buses

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T6/1	Transport	Bus network should provide a direct link between North Acton station and Wesley Estate.	1	John Cox	Noted. No change proposed. The future bus network shown in the Local Plan is an indicative network. Future changes will be subject to the usual public consultations on bus services in the area.
2/T6/2	Transport	Maps hard to read. Unclear whether there is sufficient connectivity in the area.	1	The Hammersmith Society	No change proposed. The level of detail provided for transport infrastructure within the Local Plan is appropriate to the role of a Local Plan.
2/T6/3	Transport	Excellent transport systems within the area are needed if its to be a successful sustainable community.	1	The Hammersmith Society	Noted. Policy SP7 and policies within the transport chapter provide guidance to deliver an high quality transport system.
2/T6/4	Transport	Longer term plans for the future bus network in the area will need to be developed in line with the Bus Strategy recently produced by TfL. Enhanced bus connectivity and increased capacity will be needed, partly funded through developer contributions as well as new passenger and operational infrastructure including bus priority measures, bus stops, shelters and stands etc. to support delivery of the strategy.	1	Transport for London	Noted. The Local Plan provides strategic guidance to achieve these aspirations. Detailed supplementary guidance will be developed to further secure these benefits. This includes the forthcoming Planning Obligations SPD.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T6/5	Transport	Welcomes the recognition of the important role buses will provide in delivering good public transport in this area, particularly in the early years of development and the need for temporary infrastructure or routes in early phases	1	Transport for London	Noted.
2/T6/6	Transport	<p>T4 (6?) policy should be amended as follows:</p> <p>Development proposals will be supported where they:</p> <p>a) facilitate, deliver and contribute to the existing and future Zero tailpipe Emission bus network and infrastructure, including the range of interventions identified within the IDP to provide a comprehensive and coherent bus network across Old Oak and Park Royal that is connected into the surrounding area, including priority measures where appropriate;</p>	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for improving air quality is provided in policy EU4.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T6/7	Transport	<p>Paragraph 7.49 should be amended as follows:</p> <p>London's green bus fleet is the largest in the world, combining the roll-out of new hybrid buses, the early introduction of new Euro VI buses and the retrofit programme, leading to significant improvements in emissions throughout London. OPDC will work with TfL and bus operators to promote the roll-out of Zero tailpipe Emission buses and ensure that the design of transport infrastructure in the OPDC area facilitates environmental improvements to the bus fleet.</p>	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for improving air quality is provided in policy EU4.
2/T6/8	Transport	<p>Local Plan doesn't resolve the physical connection from Scrubs Lane to North Pole West.</p> <p>Later future bus network (2041) should be referenced.</p>	1	Royal Borough of Kensington and Chelsea	No change proposed. Wormwood Scrubs Street is currently identified to be delivered after the plan period. Figure 3.10 shows the key route of Wormwood Scrubs Street towards Kensal Canalside as a potential connection reflecting the level of work undertaken in defining its delivery. Following the completion of any future work demonstrating this connection, future versions of the Local Plan will reflect this accordingly.
2/T6/9	Transport	"Bus services will be particularly important in the early phases" - this line shouldn't be deleted.	1	West Twyford Residents Association	No change proposed. Similar wording is provided in paragraph 7.44

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T6/10	Transport	There should be clear target set for 2021 as this is the year ULEZ will be introduced across London including Hammersmith and Fulham.	1	London Borough of Hammersmith and Fulham	No change proposed. The requirements of implementing the ULEZ are outside the scope of the Local Plan.
2/T6/11	Transport	Not all the existing routes are accurate.	1	John Cox	No change proposed. Existing routes are accurately depicted.

#### Policy T7- Freight, Servicing and Deliveries

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T7/1	Transport	Supports the amended text to clarify the requirement for Construction Logistics Plans (or CLPs) in accordance with TfL guidance	1	Transport for London	Noted.
2/T7/2	Transport	Welcomes amendments to policy wording to reflect emerging Construction Logistics Strategy as part of strategy development	1	Transport for London	Noted.
2/T7/3	Transport	Limitations of river freight, electric vehicles and cargo bikes not recognised in the Local Plan	1	SEGRO	No change proposed. The limitations of these will not remain as they are today.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/T7/4	Transport	Point (g) of Para 7.51 should be amended as follows:-  “g) encouraging the adoption of Zero tailpipe emission vehicle options (buying or leasing)”	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for improving air quality is provided in policy EU4.
2/T7/5	Transport	Point (d) of Policy T7 should be amended as follows:-  “d) maximise the use of more efficient and sustainable ways of delivering goods including consolidation, the use of rail, water, electric vehicles, cargo bikes and Zero Tailpipe Emission last mile deliveries by sustainable modes”	1	London Borough of Hammersmith and Fulham	No change proposed. Guidance for improving air quality is provided in policy EU4.

### ***Housing Chapter***

#### **Policy H1- Housing Supply**

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/H1/1	Housing	Policy H1 should make specific reference to the 10-year target of 13,670 set out in the draft London Plan. This figure was agreed with OPDC and is supported by the development capacity study.	1	Mayor of London	Change proposed. Policy H1b) has been amended to reference the actual 10 year housing target for OPDC from the draft London Plan. This is already set out in paragraph 8.10 of the supporting text and is therefore a minor modification.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/H1/2	Housing	The policy sets out the OPDC's annual housing target of 1, 005 units per annum. Paragraph 8.10 then refers to the draft London Plan annual housing target of 1, 367 between 2019 about 2029 (ten year period). It is unclear how the DCS can support both figures and which is more important.	2	Royal Borough of Kensington and Chelsea, London Borough of Hammersmith and Fulham	No change proposed. The Development Capacity Study (DSC) identifies that over the next 20 years of the Local Plan (2018 to 2038) 20,100 homes can be delivered. Dividing this by 20 years gives an annual target over the course of the plan of 1,005. The draft London Plan provides monitoring targets for OPDC just as it does for other planning authorities. These targets are for 10 years between 2019 and 2019. The DCS demonstrates that OPDC can deliver 1,367 during these years.
2/H1/3	Housing	We encourage the OPDC to work with partners to identify opportunities to bring forward the early delivery of new housing.	1	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
2/H1/4	Housing	HNF welcomes the commitment to support new models of delivery and management of housing and community assets, including Community Land Trusts, Community Right to Build and Community Asset Transfer. HNF would welcome further dialogue with ODPC to explore ways in which this ambition could be taken forward in a way that reflects the needs and preferences set out in the draft NP for Harlesden.	1	Harlesden Neighbourhood Forum	Noted.

## Policy H2- Affordable 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
2/H2/1	Housing	Expand Policy H2 to specifically recognise that particular organisations are encountering housing problems that are having an adverse impact on their business, and that they will be supported by the Mayor in plans to provide their own key-worker housing and that each such proposal will be considered on their merits.	1	Imperial College	Change proposed. Reference has been made in the supporting text to meeting the housing needs of essential workers in accordance with the draft London 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
2/H2/2	Housing	The London Boroughs of Brent, Hammersmith & Fulham, Ealing, Barnet, Harrow, Hillingdon, Hounslow and the OPDC have jointly commissioned a West London Strategic Housing Market Assessment (SHMA). This indicates that nearly all of those in affordable housing need across the housing market area cannot afford anything more than social rent. This emphasises the importance of prioritising London Affordable Rent over intermediate products.	1	London Borough of Brent	<p>Change proposed. OPDC's Affordable Housing Viability Assessment (AHVA) tested a number of development scenarios and affordable housing levels, including an overall target to deliver 35% and 50% affordable housing with a tenure split in each of 30%, 43% and 70% Social Rent/London Affordable Rent (LAR) housing, with the remainder provided as intermediate housing. This showed that based on current existing use values, likely current/future (non-grown) sales values, construction costs and other costs, only a tenure split of 30% Social Rent/LAR and 70% intermediate would be viable if we sought to achieve an overall affordable housing target of 50%.</p> <p>OPDC cannot set a policy that does not take account of viability – this would risk the Local Plan being found unsound.</p> <p>OPDC has however sought to make changes to the policy and supporting text to identify the 30% social rent/LAR target as a minimum target by seeking to optimise social rent/LAR through review mechanisms, public grant and seeking to exceed the 30% social rent/LAR target on schemes that do not meet the Mayor's threshold approach to viability.</p> <p>Supporting text has also been added to the policy identifying that OPDC will revisit Policy H2 and its associated viability evidence at the earliest opportunity to ensure that any increased development value can maximise the delivery of Social Rent/London Affordable Rent homes.</p> <p>See also response to comment H2/2 from the first Regulation 19 draft Local Plan.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/H2/3	Housing	Policy should read 60% London Affordable Rent and 40% Intermediate to be in conformity with national, current London Plan and draft new London Plan policy and meet housing needs.	2	London Borough of Brent, London Borough of Hammersmith and Fulham	<p>Change proposed. OPDC's Affordable Housing Viability Assessment (AHVA) tested a number of development scenarios and affordable housing levels, including an overall target to deliver 35% and 50% affordable housing with a tenure split in each of 30%, 43% and 70% Social Rent/London Affordable Rent (LAR) housing, with the remainder provided as intermediate housing.</p> <p>This showed that based on current existing use values, likely current/future (non-grown) sales values, construction costs and other costs, only a tenure split of 30% Social Rent/LAR and 70% intermediate would be viable if OPDC sought to achieve an overall affordable housing target of 50%.</p> <p>OPDC cannot set a policy that does not take account of viability – this would risk the Local Plan being found unsound.</p> <p>OPDC has however sought to make changes to the policy and supporting text to identify the 30% social rent/LAR target as a minimum target by seeking to optimise social rent/LAR through review mechanisms, public grant and seeking to exceed the 30% social rent/LAR target on schemes that do not meet the Mayor's threshold approach to viability.</p> <p>Supporting text has also been added to the policy identifying that OPDC will revisit Policy H2 and its associated viability evidence at the earliest opportunity to ensure that any increased development value can maximise the delivery of Social Rent/London Affordable Rent homes See also response to comment H2/2 from the first Regulation 19 draft Local Plan.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/H2/4	Housing	We welcome clarifications to acknowledge the significant cost of infrastructure required in Old Oak North, but continue to consider that these costs would have been more appropriately addressed through a lower headline target.	1	Old Oak Park Limited	Noted. See response to comment H2/7 from the first Regulation 19 draft Local Plan.
2/H2/5	Housing	The Mayor is pleased that amendments have been made to the policy to reflect the thresholds approach, and the Local Plan now refers to applying the most up-to-date Mayoral policy.	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
2/H2/6	Housing	It is set out in the draft London Plan that the 40 per cent to be decided by the borough will focus on Social Rent/London Affordable Rent given the level of need for this type of tenure across London. OPDC should consider how the policy can better reflect the Mayoral presumption.	1	Mayor of London	<p>Change proposed. OPDC's Affordable Housing Viability Assessment (AHVA) tested a number of development scenarios and affordable housing levels, including an overall target to deliver 35% and 50% affordable housing with a tenure split in each of 30%, 43% and 70% Social Rent/London Affordable Rent (LAR) housing, with the remainder provided as intermediate housing. This showed that based on current existing use values, likely current/future (non-grown) sales values, construction costs and other costs, only a tenure split of 30% Social Rent/LAR and 70% intermediate would be viable if OPDC sought to achieve an overall affordable housing target of 50%.</p> <p>OPDC cannot set a policy that does not take account of viability – this would risk the Local Plan being found unsound.</p> <p>OPDC has however sought to make changes to the policy and supporting text to identify the 30% social rent/LAR target as a minimum target by seeking to optimise social rent/LAR through review mechanisms, public grant and seeking to exceed the 30% social rent/LAR target on schemes that do not meet the Mayor's threshold approach to viability.</p> <p>Supporting text has also been added to the policy identifying that OPDC will revisit Policy H2 and its associated viability evidence at the earliest opportunity to ensure that any increased development value can maximise the delivery of Social Rent/London Affordable Rent</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/H2/7	Housing	This product may not meet the Mayor's definition of genuinely affordable housing and it is suggested the reference is removed.	1	Mayor of London	Change proposed. The reference to Starter Homes has been removed.
2/H2/8	Housing	We provided detailed comments on the OPDC SHMA previously which are still valid.	1	Royal Borough of Kensington and Chelsea	Noted.
2/H2/9	Housing	It may be that 50% affordable housing target cannot be achieved on all developments, but the priority should always be on securing housing which is genuinely affordable in the context of local need.	1	London Borough of Ealing	<p>Change proposed. OPDC's Affordable Housing Viability Assessment (AHVA) tested a number of development scenarios and affordable housing levels, including an overall target to deliver 35% and 50% affordable housing with a tenure split in each of 30%, 43% and 70% social rent/London Affordable Rent (LAR) housing, with the remainder provided as intermediate housing. This showed that based on current existing use values, likely current/future (non-grown) sales values, construction costs and other costs, only a tenure split of 30% social rent/LAR and 70% intermediate would be viable if OPDC sought to achieve an overall affordable housing target of 50%.</p> <p>OPDC cannot set a policy that does not take account of viability – this would risk the Local Plan being found unsound.</p> <p>OPDC has however sought to make changes to the policy and supporting text to identify the 30% social rent/LAR target as a minimum target by seeking to optimise social rent/LAR through review mechanisms, public grant and seeking to exceed the 30% social rent/LAR target on schemes that do not meet the Mayor's threshold approach to viability.</p> <p>Supporting text has also been added to the policy identifying that OPDC will revisit Policy H2 and its</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					associated viability evidence at the earliest opportunity to ensure that any increased development value can maximise the delivery of social rent/London Affordable Rent.
2/H2/10	Housing	Intermediate homes should be affordable to residents earning under £60,000 and be guided by the income thresholds set in the Council's housing strategy. For intermediate dwellings to be considered affordable, annual housing costs should be no greater than 40% of net household income, where 40% of net income is no greater than 70% of the gross income.	1	London Borough of Hammersmith and Fulham	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 preferred intermediate housing products and meet the requirements in the National Planning Policy Framework and income limits in the draft London Plan and housing strategy.
2/H2/11	Housing	Amend Para 8.25 to make reference to involving host boroughs in early pre-app discussions.	1	London Borough of Hammersmith and Fulham	Change proposed. Reference has been made to the host boroughs.
2/H2/12	Housing	in section 8.19 it says: "the presence of abnormal site constraints should impact on land values; however, the cost should not necessarily be borne through a reduction in planning obligations." This means that the tenure splits required by the OPDC	1	Sian Berry AM	No change proposed. The area has very specific challenges in terms of delivering significant infrastructure. As a successful industrial location, OPDC has high Existing Use Values and that as an area of previous heavy industry, it has relatively high decontamination costs and that consequently, viability is particularly challenging. The Local Plan tenure split must also be justified and deliverable. An Affordable Housing Viability

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		SHMA can also be achieved without compromising planning obligations. This change to policy 8.19 shows that additional obligations can be achieved without compromising planning requirements. It means the OPDC leadership should be pushing harder to achieve a tenure split that meets the acute need for social housing in the local area. This can be achieved with lower land values – especially where lower cost public land is being used or is acquired by OPDC. At present, the draft local plan is not “based on a strategy which seeks to meet objectively assessed development and infrastructure requirements,” i.e. it is not prepared positively. Policy 8.19 should be clarified and tenure splits corrected in policy 8.23 to allow the OPDC to meet the objectively assessed development requirements of the OPDC site.			Assessment has been undertaken which assessed the viability of delivering 35% and 50% affordable housing in a range of tenures. This concluded that 70% of the affordable housing being London Affordable Rent is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing. The draft London Plan sets a clear 50% affordable housing target for OPDC, As the majority of sites are public-sector land and/or de-designated Strategic Industrial Location they will have to reach the 50% threshold to benefit from the fast-track route. It is considered to be justified to apply the proposed tenure split given the viability evidence in relation to the impact of delivery of London Affordable Rent on the overall quantum of affordable homes that may be delivered.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/H2/13	Housing	Until more frequent LDD updates are available, the OPDC should maintain a rolling list of permissions on the London.gov.uk website.	1	Sian Berry AM	No change proposed. Given how data is reported to the London Development Database, activity on permissions, starts and completions may not be captured for a number of months. However, along with the rest of the GLA group, OPDC has signed up to the voluntary Code of Conduct for Official Statistics, and is publishing information on housing delivery on a quarterly basis on the website. OPDC will also publish information through the AMR and in accordance with Policy DI4.
2/H2/14	Housing	HNF continues to support the target of 50% affordable homes. As so many of the sites are already in either public ownership or the proposed developers we expect that recent changes to viability testing to reduce loopholes will ensure this target can be met.	1	Harlesden Neighbourhood Forum	Noted.

### Policy H3- Housing Mix

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/H3/1	Housing	The 25% overarching target is the wrong approach for what is an entirely new high-density quarter for London.	1	Old Oak Park Limited	Noted. See response to comment H3/3 from the first Regulation 19 draft 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
2/H3/2	Housing	As set out in policy H12 (Housing size mix) of the draft London Plan, boroughs should not set prescriptive size mix requirements for market and intermediate homes.	2	Mayor of London, Old Oak Park Limited	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 local needs. It provides a balance between delivering 50% family housing requirements as identified in the Strategic Housing Market Assessment and providing an appropriate design response for high density family housing.
2/H3/3	Housing	LBHF supports this. This should also refer to OPDC's monitoring of development.	1	London Borough of Hammersmith and Fulham	No change proposed. Policy D14 provides for the monitoring of targets, including housing targets.

#### H4- Design of Family 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
2/H4/1	Housing	To have this for 25% of units in a high-density development is not possible and so the vast majority of family units are likely to be provided in accordance with part b) of this policy.	1	Old Oak Park Limited	Noted. See response to comment H4/2 from the first regulation 19 draft Local Plan.

**Policy H5- Existing Housing**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/H5/1	Housing	The OPDC should consider how the reference to general character in c) iii) relates to draft London Plan Policy H2.	1	Mayor of London	Change proposed. The supporting text to Policy H5 has been amended to accord with Policy H2 in the draft London Plan.

**Policy H6- Build to Rent**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/H6/1	Housing	Support the recognition that Build to Rent has specific financial and viability considerations.	1	Imperial College	Noted.

## Policy H8- Gypsy and Traveller Accommodation

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/H8/1	Housing	Policy H8 a) has been amended from protecting the existing Bashley Road site to safeguarding it and working with Ealing to enhance the site where required. The effectiveness of Policy H8 a) would be significantly improved by clearly stating that capacity will be increased or the existing site expanded if necessary.	1	Royal Borough of Kensington and Chelsea	No change proposed. Responses from London Borough of Ealing and other stakeholders at the Regulation 19 stage consultation (see H8/5) requested that 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. 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. London Borough of Hammersmith and Fulham also supported the policy which states that OPDC will work with the boroughs and give careful consideration to the future needs of Gypsies and Travellers (see H8/3). OPDC has also assessed the site for additional capacity. This found that there is no additional capacity available on the site.
2/H8/2	Housing	The addendum update concludes that the existing Bashley Way site is fully occupied with no potential for additional pitch provision because there is no possibility to expand the site as it is located within SIL. Therefore, there appears to be a disconnect between the evidence base and Policy H8.	1	Royal Borough of Kensington and Chelsea	No change proposed. The policy states that OPDC will safeguard the existing Bashley Road site and work positively with London Borough of Ealing to enhance the site where required. The policy also states that OPDC will give careful consideration to the future needs of gypsies and travellers and work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to secure a sufficient supply of plots/pitches to meet the needs of existing and future gypsy and traveller households (including travelling show people). There is one permanent Gypsy and Traveller Site within OPDC's boundaries. This site is owned by the London Borough of Ealing and consists of 22 authorised and occupied pitches. OPDC's Gypsy and Traveller Accommodation Needs Assessment (GTANA) identified that there was no need for additional

Comment reference	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>pitches during the Local Plan period, in accordance with guidance on completing GTANAs and the Planning Policy for Traveller Sites (PPTS). The Joint RBKC and LBHF GTANA has identified a need for 9 pitches between 2016 to 2030 based on a site outside of OPDC's boundary but helping to meet the needs of gypsies and travellers within LBHF which includes part of OPDC's area. The councils have jointly prepared a framework methodology as part of the Joint RBKC and LBHF GTANA to appraise sites. OPDC's addendum uses the same methodology to assess the potential for sites within the OPDC area to help to meet the need identified in the Joint GTANA. It identifies that there is no capacity within the OPDC area for additional pitches to meet the needs of the Gypsy and Traveller community.</p>
2/H8/3	Housing	<p>Given the adjacent site is identified for industrial intensification, OPDC and LB Ealing should conduct a site audit in line with Policy H16 in the Draft London Plan to assess overcrowding, need for refurbishment and capacity to expand the site. Based on the findings of this audit OPDC and LB Ealing should work closely with the residents to develop a project plan to address issues and bid for the GLA Affordable Homes Programme and other resources as needed to conduct the works as soon as possible.</p>	2	London Gypsies & Travellers, Grand Union Alliance	<p>No change proposed. As noted in the supporting text of Policy H8, the London Borough of Ealing as a local housing authority is responsible for maintaining the site to ensure that it is providing appropriate facilities to support the health and well-being of residents. However, also stated in Policy H8, OPDC will work positively with the London Borough of Ealing to improve the existing site so that it continues to provide suitable accommodation for the households who live there. The Gypsy and Traveller Accommodation Needs Assessment has assessed the potential for sites within the OPDC area to help to meet the need for additional pitches to meet the needs of the Gypsy and Traveller community. It identifies that there is no capacity within the OPDC area for additional pitches.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/H8/4	Housing	Site allocations should be provided for 12 newly forming households identified in the GTANA.	1	London Gypsies & Travellers	No change proposed. The Planning Policy for Traveller sites (PPTS 2015) amended the definitions of gypsies and travelling showpeople for planning purposes, meaning that planning authorities are no longer required to plan and provide pitches for the needs of gypsies and travellers who do not travel for an economic purpose. The need arising from 12 newly forming households who do not meet the planning definition does not have to be addressed through specific Gypsy and Traveller policies in a Local Plan and that this need should be addressed alongside that of the settled community, with consideration of providing additional pitches on which caravans can be stationed to meet equality legislation. The 12 households form part of the wider Strategic Housing Market Assessment which identifies a need for 99,000 homes. OPDC has considered in a site assessment whether there is capacity for additional pitches in the area. It identifies that there is no capacity within the OPDC area for additional pitches.
2/H8/5	Housing	The site assessment study is very limited. The OPDC in conjunction with LB Brent, Ealing and Hammersmith and Fulham should commission a site search study done in close collaboration with Gypsies and Travellers in the three boroughs; this should include not only suggestions made by community members, but a full audit of public land and any sites coming forward from private owners.	1	London Gypsies & Travellers	No change proposed. The whole of OPDC's land area consists of Park Royal Strategic Industrial Location (SIL) and is protected for employment uses, is being de-designated from SIL in order to deliver 24,000 homes within mixed-use high density development or is protected Metropolitan Open Land. The site assessment concluded that these sites are not appropriate for allocation as Gypsy and Traveller sites. However, as set out in Policy H8, OPDC will work with LB Brent, Ealing and Hammersmith and Fulham to identify and meet future needs. This is supported in the comments by the Mayor of 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
2/H8/6	Housing	It is unclear why this version of the Local Plan been drafted to be in conformity with an emerging revised London Plan.	1	London Borough of Hammersmith and Fulham	No change proposed. It is recognised in the supporting text that the draft London Plan has proposed a wider definition that has been adopted in the PPTS for planning purposes in London. It is acknowledged in the supporting text that OPDC will have to review the Gypsy and Traveller Accommodation Needs Assessment and this policy should this new definition be adopted through the draft new London Plan.
2/H8/7	Housing	The OPDC's GTANA should have been reassessed, particularly in the light of the Intensification study closing down options for the enlargement and enhancement of the Bashley road site in light of the draft new London Plan definitions.	1	Grand Union Alliance	No change proposed. The GTANA has assessed the potential for sites within the OPDC area to help to meet the need for additional pitches to meet the needs of the Gypsy and Traveller community based on national definitions. It identifies that there is no need and capacity within the OPDC area for additional pitches. However, it is recognised in the supporting text of Policy H8 that the draft London Plan has proposed a wider definition for planning purposes in London which includes Gypsies and Travellers who live in bricks and mortar housing due to the lack of sufficient pitch provision. If this new definition has been adopted, OPDC will have to review the GTANA and this policy.
2/H8/8	Housing	The Mayor welcomes the OPDC's intention to work with adjoining boroughs to meet the future needs of gypsies and travellers. In his draft London Plan, the Mayor has adopted a broader definition of Gypsy and Travellers than set out in Government guidance and OPDC should adopt this definition in future assessments.	1	Mayor of London	No change proposed. It is recognised in the supporting text of Policy H8 that the draft London Plan has proposed a wider definition for planning purposes in London than has been adopted in the PPTS. The new definition includes people with a cultural tradition of nomadism, or living in a caravan, whatever their race or origin, including: those who are currently travelling or living in a caravan; those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation; and those

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
					who, on grounds of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently. It is acknowledged in the supporting text that OPDC will have to review the GTANA and this policy should the new definition be adopted.

#### Policy H9- Specialist 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
2/H9/1	Housing	Support amendments to policy to protect specialist housing where it is meeting an identified need.	1	London Borough of Brent	Noted.
2/H9/2	Housing	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	Noted. See response to comment H9/4 from the first Regulation 19 draft Local Plan.

## Policy H10- Student Accommodation

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/H10/1	Housing	The provision of affordable student accommodation should rest with the higher education institutions rather than be determined by specific requirements.	1	Imperial College	No change proposed. To ensure the plan is in general conformity with the London Plan, purpose-built student accommodation should be secured for occupation by a higher education institution and provide affordable student accommodation as defined in the policy/guidance.
2/H10/2	Housing	Provision of purpose-built student accommodation frees up more traditional housing stock for occupation by other households.	1	Imperial College	Noted.
2/H10/3	Housing	The supporting paragraphs refer to the façade, however, this is not the only design issue.	1	London Borough of Hammersmith and Fulham	No change proposed. Facade design is noted as a particular issue in the design of student accommodation by consequence of the comparable room sizes for student units. Policy H10a)vi) also requires proposals for student accommodation to provide adequate internal private living space and communal space and the policy should also be read in conjunction with Policy D4 which is referenced in paragraph 8.83.

## Employment Chapter



## Policy E1- Protecting, Strengthening and Intensifying the Strategic Industrial Location

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/E1/1	Employment	Welcomes the revisions to the Employment policies, which respond to the draft London Plan policies. It is suggested the text is amended to state 'no net loss of industrial floorspace capacity' and to refer to a 65% plot ratio. This is a measure of the potential capacity that could be delivered on low intensity or cleared industrial sites, subject to operational requirements.	1	Mayor of London	Change proposed. Policy E1 and supporting text have been amended to clarify the application of the policy.
2/E1/2	Employment	There is a need for justification of why Park Royal can't have some mixed use	2	Thomas Dyton; Wells House Road Residents Association	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/E1/3	Employment	Recommend that OPDC explicitly acknowledges that there will be exceptional circumstance which means that the principle of achieving 'no net loss' of industrial floorspace is not appropriate and conflicts with meeting the operational needs of modern businesses.	1	SEGRO	No change proposed. The Local Plan is clear that intensification should be considered on all sites in SIL and development should be comprised of uses suitable for broad industrial type activities. If intensification is not feasible, this should be demonstrated by the applicant as clarified by supporting text for Policy E1.
2/E1/4	Employment	Policy E1c) is perhaps too heavily weighted towards the delivery of small business units. Wording change is recommended	1	SEGRO	Change proposed. E1c) has been amended to clarify that a mix of sizes including small business units are required.
2/E1/5	Employment	Delete policy requirement for demonstrating ability to address future growth sectors and other future development scenarios in a Design and Access Statement.	1	Aberdeen Standard Investments	No change proposed. The Local Plan policies aim to ensure that developments function well, not just for the short term but over the lifetime of the development. The requirement for the submission of information in a Design and Access Statement in Policy E1 will ensure that buildings are well designed for their intended purpose.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/E1/6	Employment	There is the opportunity for the OPDC to have sites that comprise industrial uses but also other employment generating uses that are not industrial but which remain complementary and compatible. Innovative approaches should be fostered and included on sites designated for SIL in conjunction with other uses as part of mixed industrial another uses, especially on sites in close proximity to public transport.	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 ongoing functioning of employment uses in line with policy D6. A more flexible approach in designated SIL would not be in general conformity with London Plan policies.
2/E1/7	Employment	The draft Local Plan does not have a well-considered response to draft new London Plan focus on industrial intensification and floor space provision and expectations around no net loss are not clearly expressed in either the London Plan or the OPDC draft revised Regulation 19 Local Plan.	1	Grand Union Alliance	No change proposed. Policy E1 is in general conformity with the London Plan and is informed by the Industrial Land Review which is a supporting study to the Local Plan. The Industrial Land Review Addendum includes detailed commentary on the approach towards achieving no net loss of industrial floorspace in the OPDC area.
2/E1/8	Employment	Policy unsound as it departs radically from planning documents which have already acquired substantial weight in the planning system and have had material impacts on planning determinations.	1	Grand Union Alliance	No change proposed. The Introduction explains the legal and policy status of the Local Plan, including its relationship to the London Plan and Opportunity Area Framework. The approach in the Local Plan is in general conformity with these documents.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/E1/9	Employment	The strategy of intensification proposed is at odds with the evaluation of what is viable and effective for that area. The costs to developers, losses to existing businesses (notably owner-occupier businesses) is often prohibitive, and the preference of developers is for low-risk, low-management, high value developments.	1	Grand Union Alliance	No change proposed. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable and viable. Intensification can range from small to larger scale interventions and can include space for small business units. The most significant intensification opportunities have been identified as site allocations in the Local Plan. The Local Plan is clear that intensification should be considered on all sites in SIL and development should be comprised of uses suitable for broad industrial type activities. If intensification is not feasible, this should be demonstrated by the applicant as clarified by supporting text for Policy E1.
2/E1/10	Employment	Intensification will affect the loss of existing businesses as well as affordable, small and owner-occupied industrial spaces, and increase traffic, infrastructure use and demands for social infrastructure important for workplaces (eg nurseries and recreation), and directly impact on the quality of life of residents in the area.	1	Grand Union Alliance	No change proposed. Intensification can range from small to larger scale interventions and can include space for small business units in accordance with requirements set out in E1. The Park Royal Intensification Study demonstrates that the intensification of SIL is deliverable and viable so proposals could help deliver additional value for owner occupiers. However, where intensification is not feasible, this would need to be demonstrated by the applicant as clarified by supporting text for Policy E1. The Local Plan seeks to facilitate improvements needed in order to support intensification such as enhanced walking and cycling routes, supporting more facilities in Park Royal Centre. Policies SP9, D4, D5, D6, EU4 and EU5 alongside London Plan policies and national guidance, will be used to ensure existing residential areas benefit from appropriate standards of amenity.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/E1/11	Employment	A clear priority to protecting existing jobs and businesses should be stated as well as a policy commitment to net job creation needed in E1 and E2. It is not acceptable to remove net job targets and creation from the Employment chapters.	1	Grand Union Alliance	No change proposed. The new draft London Plan (Policy SD1) refers to capacity in Opportunity Areas in terms of new jobs and/or new homes. OPDC's Local Plan is consistent with this.
2/E1/12	Employment	A clear statement to the effect of prioritizing the re-provision of space suitable for existing Old Oak businesses in Park Royal should be placed in E1 and strengthened in E2.	1	Grand Union Alliance	No change proposed. Policies E1 and E2 will ensure the delivery of appropriate range of use classes and no net loss of floorspace capacity across the OPDC area in order to facilitate business relocations from Old Oak. Applicants are also required to submit a Business Relocation Strategy to help support this process. However, the planning process cannot control or influence which businesses occupy the newly created units.
2/E1/13	Employment	Welcome the application of the 'agent of change' principle when considering the impact of proposals adjacent to SIL, to ensure that development will not harm the functioning of existing or future employment and industrial activities in SIL.	1	Aberdeen Standard Investments	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
2/E1/14	Employment	Whilst the remaining SIL should be protected, this should not be at the expense of tenants and landowners to reallocate their buildings and sites to more productive uses if market conditions dictate. Building in flexibility to allow buildings to be re-used is a sustainable form of development.	1	Aberdeen Standard Investments	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.

#### Policy E2- Employment Sites Outside 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
2/E2/1	Employment	The SIL boundary for Old Oak is supported.	1	Imperial College	Noted.
2/E2/2	Employment	Paragraph 3.27, Policy E2 and its supporting text should provide explicit support for creating a centre of excellence and for research & development, life sciences, medical and high-tech businesses.	1	Imperial College	No change proposed. Figure 9.2 identifies a number of potential future employment growth sectors, including Med Tech and Low Carbon/Clean Tech industries and the policies allow flexibility for the full range of identified employment sectors. This flexibility is important to delivering a diverse economy. Encouraging a range of sectors could in turn mean that innovation centre(s)/cluster(s) could emerge in response to opportunities, as they arise over time.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/E2/3	Employment	The requirement of marketing evidence for a period of 12 months is not sufficient. Recommend that OPDC uses 24 months instead.	1	London Borough of Brent	No change proposed. Policy E2 applies to areas outside of SIL, including those proposed to be de-designated from SIL. The principle of SIL de-designation has already been accepted at the strategic level in the adopted OAPF (2015) and is needed to allow for redevelopment to deliver a minimum of 25,500 new homes and 65,000 new jobs. The 12 month marketing period is considered to be appropriate given this wider context.
2/E2/4	Employment	Strongly object to requirements to support business relocations. This is an onerous requirement and places additional commercial burden on the landowners in the OPDC area, restricting their ability to make commercial transactions with their tenants. If this does remain a requirement, then the additional cost and opportunity cost resulting from this policy requirement would need to be accounted for in any viability appraisal.	1	Old Oak Park Limited	No change proposed. A number of responses were received at a previous consultation stage regarding the need to support affected businesses. The requirements for applicants to demonstrate robust engagement with affected businesses throughout pre- and formal application process is aligned with OPDC's SCI. Policy DI1 makes it clear that, OPDC will appropriately balance the priorities for a range of contributions.
2/E2/5	Employment	The concern at Regulation 19 over making provision for existing businesses including relocation arrangements where needed has been addressed in new Policy E2 parts b and c and in supporting text.	1	Mayor of London	Noted.

### Policy E3- Supporting Small Business 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
2/E3/1	Employment	Policy requiring discounted rents for affordable workspace is not justified.	1	Imperial College	No change proposed. Policy E3 looks to secure workspace for small and start up businesses in various formats including discounted rents and/or shared workspace and/or small business units. The scope of the policy is not limited to discounted rents to allow for flexibility to consider the most appropriate approach on a site by site basis. The Future Employment Growth Sectors Study made a recommendation for OPDC to encourage the delivery of affordable workspace and other supporting evidence is outlined in the Policy Formulation report.
2/E3/2	Employment	Clarification is required as to what constitutes 'an appropriate quantum' of affordable workspace. A target should be set. Plan is unsound on the grounds it is not positively prepared.	1	London Borough of Brent	Noted. See response to comment E2/4 from the first regulation 19 draft 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
2/E3/3	Employment	Do not consider it necessary for the OPDC to require at 9.23 its approval of workspace and studio providers. The cost of any capped rents as a discount to market rents will need to be accounted for in any viability appraisal.	1	Old Oak Park Limited	No 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. 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.
2/E3/4	Employment	A stronger commitment is required to reprovisioning of affordable studio and office space, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reversion can be ensured.	2	Thomas Dyton; Wells House Road Residents Association	No change proposed. Policy E2 and E3 have already been amended to clarify the requirements for reproviding floorspace, supporting businesses and affordable workspace. 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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/E3/5	Employment	Recommend that OPDC remove the requirement for affordable workspace within Policy E3, given the likely adverse impacts of this on management processes and development viability. Also need to clarify the intended interpretation and application of the policy. References to new draft London Plan are problematic. Recommend the following changes are made: <ul style="list-style-type: none"> <li>•The intended flexible application of the policy to be made explicit</li> <li>•An 'appropriate quantum' to be defined – e.g. a target of X%.</li> <li>•References to affordable workspace to be omitted.</li> <li>• Clarification to be incorporated to make clear that shared workspaces are not appropriate for all workspace typologies.</li> </ul>	1	SEGRO	Change proposed. The supporting text has been amended to confirm that the nature of the provision will be considered on a site by site basis. The policy is informed by the recommendations in the Future Employment Growth Sectors Study and Industrial Estates Study. 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.
2/E3/6	Employment	Support part a)iii of Policy E3.	1	SEGRO	Noted.
2/E3/7	Employment	Whilst 'shared workspaces' might be appropriate in offices, such spaces are not appropriate for new industrial occupiers and there is no indication within the market that this is likely to change.	1	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
2/E3/8	Employment	To deliver affordable workspace we believe the OPDC will be required to provide practical/financial commitments to support this policy objective.	1	SEGRO	No change proposed. OPDC will support the successful regeneration of the area in accordance with Policy DI1.
2/E3/9	Employment	Support Policy E3 which requires proposals that generate new employment floorspace to provide a quantum of affordable workspace which is offered below market rates.	1	London Borough of Hammersmith and Fulham	Noted.

#### Policy E5-Local Access to Training, Employment and Economic Opportunities

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/E5/1	Employment	Support the OPDC's ambition to maximises access to employment, skills training and pre-employment support. (Policy E5). Policy should be explicit that these opportunities should be available to those living within neighbouring borough, as well as those within the ODPC boroughs.	1	Royal Borough of Kensington and Chelsea	No change proposed. The Policy does not include details on who local jobs might be made available to or accessed by. The supporting text is clear that OPDC will work in partnership with boroughs to implement and co-ordinate initiatives. This reference to partnership working is not limited to the host boroughs. OPDC is preparing a Planning Obligations SPD to provide more detailed guidance on this area of policy.

## ***Town Centre and Community Uses Chapter***

### **Policy TCC1- Locations for and Impacts of Town Centre Uses**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/TCC1/1	Town Centre and Community Uses	Remove reference in policy point g) to "where appropriate" for where financial contributions will be required. Policy TCC1 already includes criteria which defines where contributions will be appropriate, therefore this wording is unnecessary.	1	London Borough of Brent	No change proposed. As per the tests of soundness for Section 106 obligations, any obligations must be necessary to mitigate the impacts of development. Only schemes considered to impact upon Harlesden Town Centre would be required to provide contributions, and not necessarily all schemes which exceed the thresholds set out earlier in the policy.
2/TCC1/2	Town Centre and Community Uses	Welcome clarity that contributions will be secured to support Harlesden Town Centre, rather than submission of individual Enhancement Strategies.	1	London Borough of Brent	Noted.
2/TCC1/3	Town Centre and Community Uses	The proposed thresholds for financial contributions for development containing town centre uses are too high and should be lowered to 2,500 sqm for development within and outside of identified major town centres.	1	London Borough of Brent	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.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/TCC1/4	Town Centre and Community Uses	Under the proposed policy there is potential for out of centre development to cumulatively total in excess of 5,000sqm without being required to contribute to mitigation.	1	London Borough of Brent	<p>No change proposed. 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 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.</p> <p>The 5,000 sqm threshold applies to the Old Oak Major Town Centre given the unique scale of development to come forward in the Old Oak North in particular.</p>
2/TCC1/5	Town Centre and Community Uses	Requirement for a Town Centre Uses Statement to include details of how it is proposed to manage retail uses is not appropriate at planning application stage as this information would not be known.	1	Old Oak Park Limited	No change proposed. The Town Centre Uses Statement will be expected to provide an appropriate level of detail for a planning application on the applicants proposed approach to managing retail uses. Detailed management arrangements will not be expected to be provided.
2/TCC1/6	Town Centre and Community Uses	Welcome revisions to Policy TCC1 relating to town centre uses in SIL.	1	Mayor of London	Noted.
2/TCC1/7	Town Centre and Community Uses	Welcome the provision for small scale walk-to town centre uses in Park Royal.	1	Jean Lewis	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
2/TCC1/8	Town Centre and Community Uses	Welcome the provision for meanwhile uses in early phases of development.	2	Jean Lewis, Grand Union Alliance	Noted.
2/TCC1/9	Town Centre and Community Uses	Concerns over potential for Town Centres being managed as single entities by the private sector and the impact on enjoyment of public spaces.	2	Jean Lewis, Grand Union Alliance	Noted.
2/TCC1/10	Town Centre and Community Uses	Viability repeated twice where one should read "vitality".	2	Jean Lewis, Grand Union Alliance	No change proposed. This text error was in the version of draft Local Plan reviewed by Planning Committee and Board, but amended in the version published for consultation.
2/TCC1/11	Town Centre and Community Uses	How will Harlesden small businesses and residents be able to influence large town centre developments at Old Oak?	1	Jean Lewis	No change proposed. Local businesses and residents will be consulted on any planning applications proposing large scale town centre uses as per the Statement of Community Involvement. ODDC has also established a Community Review Group, formed of local residents, workers and business people. The Group will meet to discuss development proposals and to give its views which be a material consideration in decisions made by OPDC and the OPDC Planning Committee on any developments proposing large scale town centre 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
2/TCC1/1 2	Town Centre and Community Uses	Support ambition to focus town centre uses within designated town centres, and proposed scale A class floorspace within the OPDC Area.	1	Royal Borough of Kensington and Chelsea	Noted.
2/TCC1/1 3	Town Centre and Community Uses	Town Centre shading should be removed the Elizabeth Line depot site to reflect that the site is not projected for delivery within the Plan period.	1	Transport for London	No change proposed. Policy P1 recognises that the Elizabeth Line depot site is not envisioned to commence until beyond the plan period, but that early development would be supported. As such, it is considered appropriate to identify which uses would be appropriate on the site.
2/TCC1/1 4	Town Centre and Community Uses	Welcome references of support of Harlesden Town Centre, but feel this is at variance with policies protecting SIL land around Willesden Junction Station.	1	Harlesden Neighbourhood Forum	<p>No change proposed. Support for the continued vibrancy and vitality of Harlesden Town Centre must be balanced against the need to protect Strategic Industrial Land as required by Policy SP5 and Policy E1. 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.</p> <p>OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.</p>

## Policy TCC2- Vibrancy

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/TCC2/1	Town Centre and Community Uses	Concern that limitations placed on hot food takeaways and betting shops within the OPDC area will then lead these services to gravitate to surrounding centres such as Harlesden.	1	Grand Union Alliance	No change proposed. OPDC feel that restrictions of the locations for hot food takeaways and betting shops is justified given the concerns over the growing proliferation of these uses and their impact on mental and physical health and wellbeing. This approach is supported by OPDC's Health Town Centres Study. Planning policy for surrounding centres outside of the OPDC area is the responsibility of the relevant local authority, and in the case of Harlesden this is Brent. Like OPDC, Brent's draft Local Plan places a similar restriction on the opening of new hot food takeaways within a set distance of new or proposed primary and secondary schools.

## Policy TCC3- A-Class 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
2/TCC3/1	Town Centre and Community Uses	Policy point b) is unsound. It should be amended to say proposals should reflect (rather than have regard to) thresholds.	1	London Borough of Brent	No change proposed. The policy achieves the appropriate balance between being flexible and allowing for changing circumstances, and having sufficient controls on A-class uses. Furthermore, the A-class floorspace requirements figures supporting the policy to which this policy states proposals should have regard to are indicative floorspace figures, and not thresholds as suggested.
2/TCC3/2	Town Centre and Community Uses	Support the broad aim to promote small units but this should not stipulate a % target, and greater clarity should be provided on the	1	Old Oak Park Limited	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 the centre. OPDC



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
		what constitutes primary and secondary frontages.			considers the approach sound, in that it is justified by evidence and the inclusion of a target is an effective way of securing delivery. Primary and secondary shopping retail frontages are identified in the policies map for established town centres. For centres such as Old Oak which are not yet in existence they have not been defined as it is considered more appropriate that this be achieved through the design and planning application process. The place polices of chapter 4 provide further information development should deliver the Old Oak major town centre.
2/TCC3/3	Town Centre and Community Uses	Welcome the requirement for at least 50% of primary shopping area to be A1 class uses.	1	London Borough of Hammersmith and Fulham	Noted.
2/TCC3/4	Town Centre and Community Uses	Support policy approach for securing at least 10% of floorspace for independent/start up retailers.	1	London Borough of Hammersmith and Fulham	Noted.

#### 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
2/TCC4/1	Town Centre and Community Uses	The Accident and Emergency facility at Central Middlesex Hospital should be reopened, and other additional healthcare services should be provided at Central Middlesex Hospital.	4	Anita Ringsell, Theresa Magee, Thomas Dyton, Wells House Road	No change proposed. Provision of acute care is a matter for the acute hospital trusts and the Clinical Commissioning Groups (CCGs) in North West London. While the Local Plan has limited control over acute care provision, OPDC has and will continue to work with the acute hospital trusts and CCGs in North West London to ensure they are aware of the most up to date 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
				Residents Association	projections from development in the area so that they plan accordingly for the delivery of acute care in North West London.  Policy P6 (Park Royal Centre) in the places chapter supports the delivery of new healthcare and healthcare related uses at Central Middlesex Hospital.
2/TCC4/2	Town Centre and Community Uses	Support requirements for Places of Worship to be provided at long leases and at low cost, but there would be difficulties in faiths sharing the same space so each faith should be allocated their own space.	1	Diocese of London	No change proposed. The supporting text identifies the need for a range of community uses to be delivered within the proposed community hubs, including faith space. Where development is delivering new community uses, applicants will be expected to work with community groups to determine how these spaces should be delivered and the specific needs of different users.
2/TCC4/3	Town Centre and Community Uses	Consider that a 4FE primary school is too large and that 2/3FE would be sufficient. This need is based on affordable/family housing targets that a too high, and reducing these targets would result in a reduced child yield.	1	Old Oak Park Limited	Noted. See response to comment TCC4/7 from the first regulation 19 draft Local Plan.
2/TCC4/4	Town Centre and Community Uses	Requirement for revenue funding is unnecessarily onerous and should be removed from the Local Plan	1	Old Oak Park Limited	Noted. See response to comment TCC4/8 from the first regulation 19 draft 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
2/TCC4/5	Town Centre and Community Uses	Support approach to a single on-site health facility, but adequate pick up and drop off facilities are essential considering the needs of users.	2	Jean Lewis, Grand Union Alliance	Noted. Any proposals for new health facilities will need to be accompanied by a Transport Assessment and Travel Plan. The supporting text to Policy T9 clarifies that Transport Assessments will need to detail how transport proposals will cater for all users, including disable and vulnerable users.
2/TCC4/6	Town Centre and Community Uses	Community facilities should be heavily discounted, and permanent spaces should be provided for different groups.	2	Jean Lewis, Grand Union Alliance	<p>Change proposed. OPDC agree that community space should be provided at affordable rates to community groups. The supporting text to Policy TCC4 has been amended to clarify that community space should be made appropriately available and affordable to the local community.</p> <p>While provision of permanent spaces may not always be appropriate, the policy requires developers to work with stakeholders regarding the long term management community spaces.</p>
2/TCC4/7	Town Centre and Community Uses	Concerns over reliance on private sector to deliver/fund social infrastructure given conflict between profit and affordability.	2	Jean Lewis, Diocese of London	No change proposed. 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.
2/TCC4/8	Town Centre and Community Uses	Support approach to Social Infrastructure provision.	1	Royal Borough of Kensington and Chelsea	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
2/TCC4/9	Town Centre and Community Uses	Policy should reference that catalyst retail uses must be subject to the impact assessment and other requirements set out in Policy TCC3.	1	Royal Borough of Kensington and Chelsea	Noted. See response to comment TCC8/3 from the first regulation 19 draft Local Plan.
2/TCC4/10	Town Centre and Community Uses	The Brent, Ealing, Hammersmith and Fulham and West London Clinical Commissioning Groups support the emerging policies and changes made to the July 2017 draft version.	1	NHS London Healthy Urban Development Unit on behalf of Brent, Ealing, Hammersmith and Fulham and West London Clinical Commissioning Groups	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
2/TCC4/1 1	Town Centre and Community Uses	Query how identified on-site health facility will be funded given the lack of funding being provided for new projects by NHS England.	3	Eric Leach, Jean Lewi, Grand Union Alliance	<p>No change proposed. The need for an on-site health facility has been identified through close working with the CCGs, whose responsibility it is to manage such facilities, and OPDC must support their requirements. Policy TCC4 also requires proposals to deliver and/or contribute towards the delivery of social infrastructure to meet the needs arising from the development.</p> <p>The IDP identifies what the likely funding sources for the delivery of the on-site health facility would be.</p>
2/TCC4/1 2	Town Centre and Community Uses	Supporting text on proposed community hubs should be amended to specifically reference that these will be expected to deliver the library space as identified in the Social Infrastructure Needs Study.	1	London Borough of Hammersmith and Fulham	Change proposed. Supporting text regarding the proposed community hubs has been amended to clarify that these will provide library 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
2/TCC4/13	Town Centre and Community Uses	Transport infrastructure alone is not enough to make a place, you also need on and off site social infrastructure.	1	Grand Union Alliance	Noted. The critical role of social infrastructure in supporting new communities in the OPDC area is set out in Policy SP4, Policy TCC4, and across the relevant place polices of chapter 4.
2/TCC4/14	Town Centre and Community Uses	Proposed social infrastructure provision is limited, being delivered too far in the future, and located away from existing residential communities.	1	Grand Union Alliance	<p>No change proposed. OPDC has worked closely with social infrastructure providers to develop a preferred approach to delivery through the Social Infrastructure Needs Study (SINS) which has assessed the needs for social infrastructure provision based on projected development in the OPDC area. Provision for existing communities outside of the OPDC area is the responsibility of the relevant local authorities.</p> <p>On-site social infrastructure facilities cannot be built in advance of approvals as there will not be sufficient planning contributions to pay for the facilities, nor user demand to justify their operation. The SINS has identified the existing facilities within and adjacent to the OPDC area with capacity for expansion to cater for the needs of earliest phases of development prior to new facilities being deliver on-site.</p>
2/TCC4/15	Town Centre and	Supporting text on health provision should be amended to demonstrate that the floorspace	1	NHS London Healthy Urban Development	Change proposed. The supporting text to Policy TCC4 has been amended as suggested to clarify that the figure

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
	Community Uses	figure for on-site health provision is considered as indicative and does not commit the NHS to take on the precise quantum of on-site floorspace, or inhibit the CCGs from exploring alternative options.		Unit on behalf of Brent, Ealing, Hammersmith and Fulham and West London Clinical Commissioning Groups	for on-site health care provision is indicative and based on current projections.

#### 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
2/TTC5/1	Town Centre and Community Uses	Welcome reference for retention of existing artist studios, but reference to provision of new spaces and cross reference to Policy E2 which would allow for relocation of these studios, should be removed.	1	The Hammersmith Society	No change proposed. Policy E2 sets out how OPDC will expect development proposals outside of Strategic Industrial Locations to support existing industrial type businesses to be retained on-site. It is recognised that this may not always be feasible and/or desirable and so off-site relocation may be appropriate, particularly in relation to more intensive industrial uses. Policy TCC5 includes additional support for artist studios being reprovided on-site in such scenarios, as well as supporting new artist spaces where appropriate.

## 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
2/TCC6/1	Town Centre and Community Uses	Requirement for any more than a single 25m swimming pool is unnecessary compared to average level of provision across London.	1	Old Oak Park Limited	Noted. See response to comment TCC6/7 from the first regulation 19 draft Local Plan.
2/TCC6/2	Town Centre and Community Uses	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 Limited	Noted. See response to comment TCC6/8 from the first regulation 19 draft Local Plan.
2/TCC6/3	Town Centre and Community Uses	Do not agree with the proposed methodology and approach to sports centre provision. The 2014 Sports Courts and Swimming Pools is not up to date, and was based on Hammersmith and Fulham only. OPDC should produce a Built Facility and Playing Field Strategy for it's specific area to inform need.	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. The Sports Courts and Swimming Pools Study is based on current population projections, which haven't changed significantly since the study was published. Although the study was produced for Hammersmith and Fulham, it considered the need of a significantly wider catchment area, including the boroughs of Brent and Ealing and the OPDC area. It should also be noted that the vast majority of new homes in the OPDC are being delivered within the boundaries of Hammersmith and Fulham. As such, OPDC consider the study is an appropriate measure of need for sports and leisure provision within the OPDC area.
2/TCC6/4	Town Centre and Community Uses	Amendments to Policy TCC6 are welcome, in particular references to both indoor and outdoor leisure facilities.	1	Sport England	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
2/TCC6/5	Town Centre and Community Uses	Welcome requirement for enhancements existing facilities to meet the Inclusive Fitness Initiative Mark, but should clarify where this is applicable. Current wording could prevent some facility enhancements as it would not be directly applicable.	1	Sport England	No changed proposed. The policy approach would only be applied to schemes as applicable, and the requirements will not apply to proposals such as environmental enhancements.
2/TCC6/6	Town Centre and Community Uses	References to "playing pitches" should be changed to "playing field" to align with NPPF and offer full protection.	1	Sport England	Change proposed. References to "playing pitches" have been amended to "playing field" to reflect their full statutory protection.
2/TCC6/7	Town Centre and Community Uses	Do not consider the draft Local Plan highlights the importance of sports and recreation in providing opportunities for activity and healthy lives. The implementation of the Active Design principles should be highlighted.	1	Sport England	No change proposed. OPDC consider that policies across Local Plan support active and healthy lifestyles. This is firmly established in Policy SP3, and embedded throughout the place and development management policies of the Plan. It is not considered appropriate to specifically refer to Sport England's Active Design Principles.

## 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
2/TCC7/1	Town Centre and Community Uses	Existing community assets should be protected, including the Castle Pub at North Acton.	2	Thomas Dyton, Wells House Road Residents Association	No change proposed. Policy TCC7 recognises the important role of public houses as hubs for community life. Any proposals resulting in the loss of an existing public house must ensure the asset has been competitively marketed for a period of 24 months and undertake public consultation to ascertain the value of the public house to the local community.
2/TCC7/2	Town Centre and Community Uses	Support protection of Public Houses under Policy TCC7 as the remain vital community assets.	1	Grand Union Alliance	Noted.
2/TCC7/3	Town Centre and Community Uses	Changes to Policy TCC7 are welcome, but still feel the policy is overly restrictive towards the loss of public houses.	1	Citrus Group and Fuller Smith & Turner	No change proposed. The policy is similar in its restrictions to the loss of public houses as 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.
2/TCC7/4	Town Centre and Community Uses	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 and CAMRA guidance.	1	Citrus Group and Fuller Smith & Turner	Noted. See response to comment TCC7/2 from the first regulation 19 draft 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
2/TCC7/5	Town Centre and Community Uses	TCC7/3 “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	Noted. See response to comment TCC7/3 from the first regulation 19 draft Local Plan.
2/TCC7/6	Town Centre and Community Uses	Policy strand with respect to marketing a public house as an "alternative local community facility" is not justified as public houses are no community facilities as per the use class order. (CHANGE PROPOSED)	1	Citrus Group and Fuller Smith & Turner	Change proposed. OPDC agree that marketing a public house as an alternative community facility would not align with the respective use classes of public houses as A3/A4 and community facilities as D1. The reference to marketing for an alternative community facility has therefore been removed from policy.
2/TCC7/7	Town Centre and Community Uses	TCC7/4 “Appropriate publications” lacks definition and is poorly worded.	1	Citrus Group and Fuller Smith & Turner	Noted. See response to comment TCC7/4 from the first regulation 19 draft Local Plan.
2/TCC7/8	Town Centre and Community Uses	Policy point a) iv) is not justified as it is overly restrictive to seek to dictate the condition in which landowners should maintain their properties. The Policy is poorly worded and lacks definition.	1	Citrus Group and Fuller Smith & Turner	No change proposed. The policy requires the premises to be maintained in a condition where it can be operated as a public house as this is necessary for the property to be competitively marketed for this purpose.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/TCC7/9	Town Centre and Community Uses	TCC7/7 The concept of “similar facilities” and “similar community environment” are too subjective and broad to form an appropriate policy test. The policy is too onerous as currently worded, and is therefore not justified or sound	1	Citrus Group and Fuller Smith & Turner	Noted. See response to comment TCC7/7 from the first regulation 19 draft Local Plan.
2/TCC7/10	Town Centre and Community Uses	TCC7/8 Policy should recognise that alternative uses could themselves generate a positive impact beyond that currently being provided by a public house.	1	Citrus Group and Fuller Smith & Turner	Noted. See response to comment TCC7/8 from the first regulation 19 draft Local Plan.
2/TCC7/11	Town Centre and Community Uses	TCC7/9 Policy point d) assumes a definitive conclusion can be reached through public consultation which is not the case.	1	Citrus Group and Fuller Smith & Turner	Noted. See response to comment TCC7/9 from the first regulation 19 draft Local Plan.

**Policy TCC8- Catalyst Uses**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/TCC8/1	Town Centre and Community Uses	Support inclusion of education as a category of catalyst uses, and emphasise the research activities of educational institutions.	1	Imperial College	Noted. Research activities are considered within the culture, health and education category of catalyst uses. Further detail on the different types of catalyst uses is included within OPDC's Catalyst Uses Study.

**Policy TCC9- Meanwhile Uses**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/TCC9/1	Town Centre and Community Uses	Welcome introduction of a test of appropriateness in relation to meanwhile uses.	1	Old Oak Park Limited	Noted.

**Policy TCC10- Visitor Accommodation**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/TCC10/1	Town Centre and Community Uses	Welcome revisions to Policy TCC10 removing reference to 40,000 new hotel bedrooms.	1	Mayor of London	Noted.

## ***Delivery and Implementation Chapter***

### **Policy DI1- Balancing Priorities and Securing Infrastructure Delivery**

<b>Comment reference</b>	<b>Section of Local Plan comment relates to</b>	<b>Issue Summary</b>	<b>Number of consultees who raised issue</b>	<b>Name of consultees who raised the issue</b>	<b>OPDC Response</b>
2/DI1/1	Delivery and Implementation	CIL and Section 106 funds should be spread across the area impacted by development. OPDC should provide financial support to communities	3	Thomas Dyton; Wells House Road Residents Association; Harlesden Neighbourhood Forum	Noted. Policy DI1 sets out OPDC's strategic approach to planning contributions. Further guidance will be provided in OPDC's forthcoming Planning Obligations SPD and through the development of OPDC's CIL Charging Schedule.
2/DI1/2	Delivery and Implementation	LBHF request greater involvement in negotiating S106 Planning Agreements, agreeing Heads of Terms and the spending of CIL and S106 monies arising from development. The involvement of host boroughs in this process should be referenced in Policy DI1.	1	London Borough of Hammersmith and Fulham	No change proposed. OPDC's approach to involving the boroughs in Section 106 agreements will be set out in OPDC's forthcoming Planning Obligations SPD which will be consulted on in due course. The allocation of CIL monies is set out through OPDC's Regulation 123 List, which is produced separately to the Local Plan.
2/DI1/3	Delivery and Implementation	The preparation of a Planning Obligations SPD is not mentioned in this Policy. Given LBHF is the infrastructure provider for a number of service areas, LBHF would welcome being involved in the preparation of this document ahead of the start of public consultation.	1	London Borough of Hammersmith and Fulham	Noted. Paragraph 11.11 confirms that a planning obligations SPD will be developed. This will be consulted on in due course, including with the boroughs.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/DI1/4	Delivery and Implementation	The level of Section 106 and CIL contributions sought on individual sites should ensure that new development remains viable and that the market is appropriately incentivised to bring schemes forward. Land owners and tenants at Park Royal should not be overburdened and penalised by being required to make significant contributions to fund ambitious infrastructure plans at Old Oak.	1	Aberdeen Standard Investments	Noted. Policy SP10 requires development to contribute appropriately and proportionately towards required infrastructure. Policy DI1 also seeks to balance a range of priorities to support the successful regeneration of the OPDC area.
2/DI1/5	Delivery and Implementation	OPDC's Local Plan contained little consideration of financing mechanisms and it wasn't clear how developments that would take place over more than two decades would be funded. Research is available on financing options including land value capture mechanisms. When there has been strong political will and clear leadership, land value capture mechanisms have been used successfully to fund initial development. The OPDC needs to give careful consideration to retaining the ownership of sites, in order to secure the permanent income to meet the long-term costs.	1	Professional Land Research Group and Coalition for Economic Justice	No change proposed. It is not the role of the Local Plan to develop a clear cashflow funding model for all development delivery. 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 variety of funding sources that may need to be explored to make support the delivery of infrastructure.

### 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
2/DI3/1	Delivery and Implementation	Support for continued support of neighbourhood forums	1	Harlesden Neighbourhood Forum	Noted.

### Supporting studies

#### A40 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
2/A40	A40 study	Improvements to pedestrian facilities at Savoy Circus should be mentioned	1	LBHF	No change proposed. The A40 Study provides options for improving walking routes.

### Bus 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
2/BS	Bus Strategy	Supports the development of infrastructure to support the implementation of electric buses throughout the borough, including the Old Oak area.	1	LBHF	Noted.



## Car Parking 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
2/CP/1	Car Parking Study	The document proposes limiting car parking to 0.2 spaces per residential unit in the early years of development, reducing to car free when transport investment is committed. The Highway Authority questions the mechanism which is proposed to ensure that this will occur post development.	1	LBHF	Noted. The implementation and enforcement of this policy will need to be carried out in close collaboration with the local highways authorities. This is referenced in supporting text to Policy T4.
2/CP/2	Car Parking Study	An approach is required to determine the differing car parking requirements of developments located in areas of varying PTAL levels. Such an approach should be agreed by TFL, OPDC and the council.	1	LBHF	No change proposed. The approach set out in the Local Plan is based upon recommendations of the Car Parking Strategy which represents a robust and evidence-based approach. The car parking standards are sufficiently restrictive so as to not require an approach that is further related to PTAL.
2/CP/3	Car Parking Study	Supports car permit free developments in areas of PTAL 3 and above. Car permits may be issued to residential developments in areas of PTAL 1-2 subject to the assessment of overnight on-street parking stress.	1	LBHF	Noted. This would be implemented after the delivery of car parking spaces in accordance with policy T4.

## Construction and Logistics 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
2/CL/1	Construction & Logistics Strategy	The council will require that a construction logistics liaison group is established and funded by developers, in order to ensure co-ordination on the public highway in regard to construction vehicle traffic.	1	LBHF	Noted. This is within the TfL CLP guidance which the local plan requires developers to adhere to.
2/CL/2	Construction & Logistics Strategy	CLP's 'will be approved by OPDC and TfL'. This is not correct as CLP's will be for local roads which will be approved by the Highway Authority.	1	LBHF	No change proposed. CLPs are approved by OPDC. Local Highways Authorities will be consulted in the consideration of a CLP.

## 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
2/DCS/1	Development Capacity Study	Continue to support the inclusion of the Cargiant site as Site 5 in Appendix B for inclusion in Part 1 of OPDC's Brownfield Register.	1	Old Oak Park Limited	Noted.
2.DCS/2	Development Capacity Study	This starting point for assessing development capacity and density ranges is deeply flawed, as it is not based on any evidence and establishes unrealistic targets for a complex site such as the OPDC, presently with minimal sources of	1	Grand Union Alliance	No changes proposed. The Development Capacity Study (DCS) fulfils the role of a Housing and Economic Land Availability Assessment which has been developed in accordance with the National Planning Practice Guidance. The DCS has identified sites and broad locations and assessed their development potential as is required under 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
		funding for infrastructure and remediation.			
2.DCS/3	Development Capacity Study	Support for continued inclusion of site 5 in OPDC's Brownfield Register.	1	Old Oak Park Limited	Noted.

#### Development Infrastructure Funding 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
2/DIFS	Development Infrastructure Funding Study	Previous comments on inaccuracies in the Development Infrastructure Funding Study relating the Counters Creek sewer have not been taken forward.	1	Royal Borough of Kensington and Chelsea	Change proposed. The supporting study summary for the Development Infrastructure Funding Study now includes text clarifying that elements of the study have been updated by other studies. For water infrastructure, the study has been updated by the Integrated Water Management Strategy and the Utilities Study.

## 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
2/DTC	Duty to Cooperate Statement	Extremely disappointed to note that none of the supporting documentation for the second revised draft Local Plan (including the Waste Apportionment Study, the Waste Management Strategy, the Duty to Cooperate Statement and the Statement of Consultation) mentions Lambeth, Kensington & Chelsea and Wandsworth's aspiration to pool capacity and apportionment targets and to plan for waste collectively across the Western Riverside area, the findings of the Waste Technical Paper or address or take account of our joint representation on this matter. The omission from supporting documentation means that it is not possible for an Inspector to assess if the OPDC's Local Plan is sound. While OPDC do not have their own apportionment targets, the corporation is a waste planning authority and has planning control over the main sources of available waste capacity in the Western Riverside area.	3	London Boroughs of Lambeth and Wandsworth and the Royal Borough of Kensington and Chelsea	Change proposed. Although responses were provided in the Statement of Consultation to this matter, for clarity, additional references to the MoU and request from the WRWA planning authorities have been added to the Duty to Cooperate Statement.

## Gypsy and Traveller Accommodation Needs 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
2/GTANA	Gypsy and Traveller Needs Assessment	OPDC has not presented any evidence of a wider call for sites for gypsy and traveller use or undertaken a review of other sources of potential sites.	1	Royal Borough of Kensington and Chelsea	No change proposed. During the consultation on the Regulation 18 draft Local Plan in February 2016, OPDC issued a call for sites capable of contributing towards OPDC's overall housing supply. 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). OPDC has undertaken an assessment of sites that could potentially meet the needs of other local authorities such as RBKC. This has shown that there are no sites within the OPDC area that would be suitable for designation for additional gypsy and traveller pitches as they are either designated as Strategic Industrial Location (SIL), Opportunity Area or Metropolitan Open Land/ open space.

## 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
2/HS/1	Heritage Strategy	Support for 23-25 Scrubs Lane as Locally Listed Asset as set out in the Proposed Local Heritage Listings consultation.	1	London Borough of Hammersmith and Fulham	Noted. 23-25 Scrubs Lane will continue to be proposed as a Locally Listed 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
2/HS/2	Heritage Strategy	Old Oak and Wormholt Conservation Area should be shown as an existing conservation area.	1	London Borough of Hammersmith and Fulham	Noted. This is shown on page 161.

#### Industrial Land Review

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/ILR/1	Industrial Land Review	Figure 4 states industrial site allocations but does not seem to identify the new sites allocations for industrial intensification.	1	A40 Data Centre B.V	No change proposed. The Figure is consistent with Table 3.1 in the Local Plan.
2/ILR/2	Industrial Land Review	Supportive of the reasoning behind this recommendation for de-designation. 628 Western Avenue is located within, but on the edge of the SIL designation and adjacent to Park Royal Underground Station. This site, similar in nature to Sites 2 and 5 mentioned above would provide a highly acceptable location for industrial uses and other non-industrial complementary uses, like hotel.	1	A40 Data Centre B.V	No change proposed. 628 Western Avenue is within an area proposed to remain designated as SIL. 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. A more flexible approach in designated SIL would not be in general conformity with London Plan policies.

### 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
2/IDP	Infrastructure Delivery Plan	Works identified in the IDP in proximity to the Grand Union Canal should not adversely affect the structural integrity of the canal and early discussions with the Canal River Trust Infrastructure Services Team are advised.	1	Canal & River Trust	Noted. No change proposed. As landowner, the Canal and River Trust will be contacted regarding any development proposals adjacent to the canal which may impact upon it.

### 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
2/IIA	Integrated Impact Assessment	<p>Inadequate consideration of alternative options for development capacity in the Integrated Impact Assessment is contrary to EU requirements for Strategic Environmental Assessments.</p> <p>Integrated Impact Assessment of Further Alternations to the London Plan did not adequately consider alternatives for London wide growth. Therefore the OPDC Local Plan IIA cannot rely on this to inform approach to realistic alternatives.</p>	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	<p>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 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."</p> <p>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</p>

Comment reference	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 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 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. Therefore the approach taken in the Local Plan continues to be considered as the most appropriate strategy for the OPDC area.



### Integrated Water Management 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
2/IWMS/1	Integrated Water Management Strategy	The IWMS should include further detail on the impact of development on the Counters Creek system, including pre and post development capacity in the sewer.	1	Royal Borough of Kensington and Chelsea	No change proposed. The IWMS recognises the capacity constraints in the Counters Creek Sewer and so advises that proposals be required to demonstrate how the development will enable capacity to be released in the sewer network to accommodate additional foul water flows.

### Old Oak North Development Framework 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
2/OONDF P/1	Old Oak North Development Framework Principles	Welcome opportunity to comment on the Old Oak North Development Framework Principles.	1	Transport for 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
2/OONDF P/2	Old Oak North Development Framework Principles	The Old Oak North Development Framework Principles refers to a 2-track viaduct. TfL current position is that a 3-track viaduct is the most preferable option. As TfL currently will not be funding the station, TfL recognises need to consider lower cost alternative solutions and will work with OPDC to explore these. Network Rail should be engaged.	1	Transport for London	Noted. The Local Plan does not make reference to the width of the viaduct. The Development Framework document sets out OPDC's preferred approach for a two-track viaduct. This is considered to be most appropriate in delivering benefits of optimised development potential and north-south connectivity. OPDC will work with TfL and Network Rail in developing the detailed design of the viaduct.
2/OONDF P/3	Old Oak North Development Framework Principles	Strategic SuDS are required	1	Environment Agency	Noted. As out set out in Policy EU3, strategic SuDS incorporated into streets, open spaces and other areas of public realm will form part of OPDC's approach to managing surface water run-off. As Old Oak is formed predominantly of hard surfaced areas at present, this will make a significant contribution towards the Mayor's target for removing impermeable surfaces.
2/OONDF P/4	Old Oak North Development Framework Principles	Support for inclusion of principles emphasising good public transport connections required to support development.	1	Transport for London	Noted.
2/OONDF P/5	Old Oak North Development Framework Principles	The document should emphasis TfL's support for the West London Line delivered as a viaduct and the new Hythe Road Station.	1	Transport for London	Noted. The supporting text to PR5 will be updated to emphasise TfL's support.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/OONDF P/6	Old Oak North Development Framework Principles	The document should emphasise the need for double decker buses to cross the West London Line.	1	Transport for London	No change proposed. This requirement is set out in PR1, PR2 and PR5.
2/OONDF P/7	Old Oak North Development Framework Principles	Walking and cycling routes and high quality public realm is important.	1	Transport for London	Noted.
2/OONDF P/8	Old Oak North Development Framework Principles	Should the delivery of Hythe Road Station be confirmed, passive provision for the station should be required.	1	Transport for London	No change proposed. This consideration is addressed within Policy SP10.
2/OONDF P/9	Old Oak North Development Framework Principles	Details considerations for rights of way and management need to be considered for routes.	1	Transport for London	Noted. OPDC will work with TfL, the local highways authority and other stakeholders to define these considerations.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/OONDF P/10	Old Oak North Development Framework Principles	Amend wording to reflect delivery of PTAL 6a and 6b; amend wording to reflect all connections should deliver the Healthy Streets Approach	1	Transport for London	Change proposed. To reflect some locations away from public transport services in Old Oak North and South currently being shown as having Public Transport Accessibility Levels 6a, PR1 will be amended to seek to achieve PTAL 6b.  Change proposed. PR1 will be amended to refer to streets and non-vehicular routes.
2/OONDF P/11	Old Oak North Development Framework Principles	Paragraph 1 should make reference to Old Oak Common Station.	1	Transport for London	No change proposed. The table supporting PR1 makes reference to Old Oak Street connecting to Old Oak Common Station.
2/OONDF P/12	Old Oak North Development Framework Principles	Principle PR3(d) should be amended to make reference to Old Oak Common Station.	1	Transport for London	Change proposed. PR3(d) will be updated to refer to Old Oak Common Station.
2/OONDF P/13	Old Oak North Development Framework Principles	Principle PR4 supporting text should be amended to refer to delivering high quality walking and cycling routes across bridges and underpasses.	1	Transport for London	Change proposed. Supporting text will be updated to refer to delivering high quality walking and cycling routes.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/OONDF P/14	Old Oak North Development Framework Principles	Principles PR4 should identify Figure 10 as indicative and confirm further working with stakeholders is required for bridges across the canal.	1	Transport for London	No change proposed. The introduction chapter confirms images are indicative. The supporting text refers to the need for further detailed design work for the location and form of canal bridges.
2/OONDF P/15	Old Oak North Development Framework Principles	Principles should set out more clearly which connections need to enable movement of double decker buses.	1	Transport for London	Change proposed. Principle PR2 will make reference to other routes.
2/OONDF P/16	Old Oak North Development Framework Principles	The document does not provide information for Wormwood Scrubs Street. Access from Old Oak Common Station should be to Wormwood Scrubs Street and not Wormwood Scrubs.	1	Wormwood Scrubs Charitable Trust	No change proposed. Wormwood Scrubs Street is located in Old Oak South outside of the geographic scope of the Old Oak North Development Framework Principles.
2/OONDF P/17	Old Oak North Development Framework Principles	Access to Wormwood Scrubs via the bridge from Old Oak Street will be considered as part of the GIOSSMP. The GIOSSMP will consider access points from Old Oak Common Lane and Scrubs Lane.	1	Wormwood Scrubs Charitable Trust	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
2/OONDF P/18	Old Oak North Development Framework Principles	<p>London Plan target of 24,000 new homes for Old Oak is too high for sustainable development and liveable communities.</p> <p>The Development Framework Principles does not set out a rationale why Old Oak North should test new building typologies. Further rationale should be given beyond meeting London Plan targets.</p> <p>Recognition provided that proposed densities ranges in earlier versions of the Local Plan would not have delivered London Plan targets.</p> <p>Examination in Public provides last opportunity for local people to raise density issues. Debates at the OPDC Board and Planning Committee have not recognised the planning context has changed since 2015, or the increased development capacity and densities.</p>	2	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	<p>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) and the Draft New London Plan (Policy SD1) supports development in these areas that potentially exceeds defined targets by optimising development densities. The Mayor of London's Housing SPG (2016) paragraphs 7.5.7 and 7.5.8 state 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 the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2). The Draft New London Plan 2017 removes the density matrix and instead requires a broader approach that optimises densities. The Old Oak North Development Framework Principles sets out this broader approach and has been used to inform OPDC's Development Capacity Study. A rigorous development capacity process has been undertaken to define the homes and economic floorspace capacity of Old Oak North to ensure it optimises development to meet the targets set out in the Mayor's London Plan. This assessment is informed by a range of factors including future excellent PTAL levels, the future movement network, London Plan and Local Plan policies, principles set out in the Old Oak North Development Framework Principles and environmental, economic</p>

Comment reference	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>viability and social considerations.</p> <p>No change proposed. The content of the Development Framework Principles and Local Plan policies provide guidance to ensure that high density typologies, required to optimise development capacity to meet targets, are of the highest design quality to support sustainable communities and appropriately address issues such as, inter alia, context and townscape (SP9), access, inclusivity and Healthy Streets (D2), amenity (D6), provision of 30% publicly accessible open space (EU1), air quality (EU4), high quality social infrastructure provision (TCC4) and noise and vibration (EU5). These policies will be supplemented by forthcoming supplementary planning documents.</p> <p>No change proposed. An overarching contextual issue for the Local Plan is the need to optimise development capacity to help address the London-wide demand for housing and economic floorspace. To address this issue, the London Plan has been strengthened to deliver a range of housing types and employment floorspace. The Local Plan reflects this ambition through further testing of development capacities within Old Oak North and intensifying industrial floorspace in Park Royal. The average density set out in the Development Framework Principles continues to be within the range of densities set out in the previous and current version of OPDC's Local Plan. The total development capacity for housing remains similar to previous versions and the total development capacity for economic floorspace, within Old Oak North, has been reduced in light of demand. At each stage of its development, the Local Plan has been reviewed by OPDC Planning Committee and Board.</p>

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/OONDF P/19	Old Oak North Development Framework Principles	Adoption Strategy for streets is required.	1	London Borough of Hammersmith and Fulham	Change proposed. Policy T1 and supporting text will be amended to require that streets are offered to local highways authorities for adoption.
2/OONDF P/20	Old Oak North Development Framework Principles	Description of Key Routes in PR1 is too vague.	1	London Borough of Hammersmith and Fulham	No change proposed. PR1 provides information for the location and role of key routes. Other principles provide information for transport modes along these routes
2/OONDF P/21	Old Oak North Development Framework Principles	Stronger support for segregated cycle lane along Scrubs Lane should be provided.	1	London Borough of Hammersmith and Fulham	Change proposed. To ensure consistency with the Scrubs Lane Development Framework Principles PR3 will be amended.



Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/OONDF P/22	Old Oak North Development Framework Principles	Concern regarding building heights information within the Development Framework Principles will result in an undefined wall of large scale development.	1	London Borough of Hammersmith and Fulham	No change proposed. A rigorous development capacity process has been undertaken to define the homes and economic floorspace capacity of Old Oak North to ensure it optimises development to meet the targets set out in the Mayor's London Plan. This capacity will result in high density development. The Development Framework Principles have considered, at a level of detail appropriate for planning policy and guidance, what building heights are required to accommodate these densities and to accord with London Plan and Local Plan policies. This process has resulted in the heights information set out in PR14. Massing and heights of proposals will need to accord with all relevant London Plan and Local Plan policies alongside any material considerations to deliver a high quality skyline and an appropriate standard of amenity.
2/OONDF P/23	Old Oak North Development Framework Principles	Key of figure 7 does not show all the illustrated routes. Question direct route to Willesden Junction.	1	London Borough of Hammersmith and Fulham	Noted. Figure 7 illustrates bus routes through Old Oak North. Local Plan policy T6 and figure 7.14 set out the bus routes in detail. The Old Oak North Development Framework Principles has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. The consultants undertook a robust assessment of the technical constraints of Old Oak North and Willesden Junction to identify deliverable connections to surrounding areas. This work has shown that delivering an all modes route north of Park Road to Harlesden is very challenging at the time of the publication of the Local Plan. Therefore the Local Plan proposes it to be a high quality walking and cycling route to ensure a strong connection to Willesden Junction and Harlesden. Bus routes will continue to provide access to Willesden Junction from Old Oak Lane and Harrow Road via 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
2/OONDF P/24	Old Oak North Development Framework Principles	Town centre locations are unfocussed and viability of quantum is questioned.	1	London Borough of Hammersmith and Fulham	No change proposed. The quantum of town centre uses have been informed by OPDC's Retail and Leisure Needs Study, which has considered future retail trends, and have been tested further through the Development Framework Principles for deliverability. The location of the town centre uses reflects the locations of key routes, the potential Hythe Road Station.
2/OONDF P/25	Old Oak North Development Framework Principles	Birchwood Nature Reserve is not shown on Figure 19.	1	London Borough of Hammersmith and Fulham	Change proposed. Birchwood Nature Reserve will be shown on Figure 19.
2/OONDF P/26	Old Oak North Development Framework Principles	Green street needs to be defined.	1	London Borough of Hammersmith and Fulham	No change proposed. Green Streets are defined in the Local Plan Glossary
2/OONDF P/27	Old Oak North Development Framework Principles	Concerns regarding delivering walking and cycling route, protecting biodiversity and playing fields in Old Oak Park.	1	London Borough of Hammersmith and Fulham	No change proposed. The Local Plan provides a range of policies to support the delivery of multifunctional publicly accessible open spaces. The Development Framework Principles seeks to illustrate how these policies could be successfully implemented in Old Oak North Local 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
2/OONDF P/28	Old Oak North Development Framework Principles	Detailed guidance in supporting documents such as the Old Oak North Development Framework Principles has not placed enough emphasis on environmental issues, and there is a lack of an overarching environmental/green infrastructure strategy. This risks a piecemeal and incoherent approach to the delivery green infrastructure and SuDS.	1	Environment Agency	No change proposed. The Local Plan Policies SP2, SP8 and Environment and Utilities Chapter policies provide strategic guidance to deliver a coordinated approach to delivering green infrastructure. The Old Oak North Development Framework Principles document is a supporting study to the Local Plan and to the forthcoming Old Oak North and Scrubs Lane SPD. The SPD will be consulted on in due course.

#### Old Oak Strategic Transport 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
2/OOST	Old Oak Strategic Transport Study	Excluding the front cover, this document is from 2015 and would like to know if this has been updated at all?	1	London Borough of Hammersmith and Fulham	No change proposed. The document has not been updated.

## 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
2/PS/1	Precedents Study	Precedents Study could be expanded to include an example of large existing open space within a regeneration project.	1	Wormwood Scrubs Charitable Trust	No change proposed. While the study doesn't include such an open space as a precedent in isolation, it does include precedents of regeneration schemes where such spaces are being delivered and highlights them. Examples include the delivery of Granary Square at Kings Cross, and the open spaces at Queen Elizabeth Olympic Park. The Precedent Study will be updated on a ongoing basis.
2/PS/2	Precedents Study	Relevant London precedents do not relate to the challenges of bringing the OPDC site forward for planned scale of development.	1	Grand Union Alliance	No change proposed. While all elements of each precedent may not relate to the specific challenges faced at Old Oak and Park Royal, the key learning points which are relevant have been highlight.

## Social Infrastructure 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
2/SIN/1	Social Infrastructure Needs Study	The child yield numbers from the GLA methodology for calculating population on which this study has been based are too high. The affordable housing assumption doesn't consider the viability challenges in meeting the policy requirement, using Brent sample sites isn't reflective of the more dense urban form of development planned for Old Oak.	1	Old Oak Park Limited	No change proposed. The SINS has used the updated GLA Child Yield Calculator (2017) to inform assumptions, which is based on recent precedents of higher density development and so a better reflection of the type of development set to be delivered at Old Oak. The assumptions in the study also reflect the policy requirements for affordable housing and specialist housing. To base assumptions on anything other than policy requirements would not be justified.
2/SIN/2	Social Infrastructure Needs Study	Brent Council raised concerns on the proposed assumptions in the SINS by email on the 12th April and feel the points raised have not been fully addressed in the published study.	1	London Borough of Brent	Noted.
2/SIN/3	Social Infrastructure Needs Study	The affordable housing tenure mix of just 25% on which the Study's methodology is based isn't reflective OPDC policy requirements of 30%.	2	London Borough of Brent, London Borough of Hammersmith and Fulham	No change proposed. The study methodology accurately reflects OPDC's policy requirement for the tenure mix of housing, which is 30% of habitable rooms as London Affordable Rent. The Study has converted this policy requirement to the number of units, which results in the 30% habitable room requirement equating to 25% of units.

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/SIN/4	Social Infrastructure Needs Study	Object to the assumption that take-up of school nursery places will be 76%, and feel an assumption of a 50/50 split between public and private nursery provision would be more appropriate.	1	London Borough of Brent	No change proposed. When contacted as part of the development of the SINS, LB Brent noted that they were not in a position to provide a figure for the take up of school nursery places given the variances across the Borough. No suggestion that 50% would be an appropriate figure was provided. It was agreed that the assumption be based on the figure provided by the London Borough of Ealing which indicated a 76% take up of school nursery places within that Borough. Where Brent did provide advice on assumptions (for example early years take up) this was incorporated within the study.
2/SIN/5	Social Infrastructure Needs Study	Query which schools have been identified as having potential for off-site expansion. Brent advised in the formation of this study that they were not in a position to confirm capacity would be available, and are concerned that development in the OPDC area will place additional pressure on schools in Southern Brent and reduce availability of places to children who live further north in the Borough.	1	London Borough of Brent	Noted. Schools with potential for off-site expansion were identified by the London Borough of Hammersmith and Fulham, as evidenced through their Schools Expansion Study. The SINS gave full consideration to accessibility issues, and a number of potential options for off-site expansion were discarded on this basis. As LB Brent were not in a position to confirm suitable candidates for off-site school expansion, no assumption was made for any potential off-site expansion options in LB Brent. The issue of additional pressure on schools towards LB Brent's southern border is a catchment area issue, and it is for each school to establish their own catchment area.
2/SIN/6	Social Infrastructure Needs Study	Support proposed health centre on the Car Giant site allocation.	1	Jean Lewis	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
2/SIN/7	Social Infrastructure Needs Study	Service users and local residents should be involved as stakeholders in the same manner as service providers.	1	Jean Lewis	No change proposed. Service users and local residents will be consulted on proposals for social infrastructure through the Local Plan and planning application processes, as per the provisions of OPDC's Statement of Community Involvement.
2/SIN/8	Social Infrastructure Needs Study	Concern at suggestion of minimal/no car parking for schools and health care facilities, in particular for staff.	2	Jean Lewis, Grand Union Alliance	No change proposed. Any proposals for new social infrastructure facilities will be required to submit Transport Assessments and Travel Plans in accordance with Policy T9 and commit to a long-term strategy to deliver sustainable transport objectives, which will be regularly reviewed. Staff for either educational or health facilities will be encouraged to travel sustainably and will be assisted by information and options within a staff Travel Plan.
2/SIN/9	Social Infrastructure Needs Study	Health service provision should consider the future workforce as well as the resident population.	2	Jean Lewis, Grand Union Alliance	No change proposed. The assessment of the need for future healthcare provision within the area has taken into consideration the projected increase in the working population arising from new development.
2/SIN/10	Social Infrastructure Needs Study	Support proposals for co-location of services but this requires early stakeholder engagement.	2	Jean Lewis, Grand Union Alliance	Noted.
2/SIN/11	Social Infrastructure Needs Study	Concerns over assumptions made regarding future residents changing GP practices.	2	Jean Lewis, Grand Union Alliance	No change proposed. OPDC recognises that individuals can choose which GP practice to register at and has planned for the likely overall capacity required to meet the needs arising from new development in the OPDC 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
2/SIN/12	Social Infrastructure Needs Study	The Social Infrastructure Needs Study has not undertaken an adequate assessment of secondary/acute health care needs. OPDC should undertake further work to project the acute care needs of the increase population.	5	London Borough of Hammersmith and Fulham, Diocese of London, Jean Lewis, Grand Union Alliance, Eric Leach	No change proposed. Provision of acute care is a matter for the acute hospital trusts and the Clinical Commissioning Groups (CCGs) in North West London. While the Local Plan has limited control over acute care provision, OPDC has and will continue to work with the acute hospital trusts and CCGs in North West London to ensure they are aware of the most up to date population projections from development in the area so that they plan accordingly for the delivery of acute care in North West London.
2/SIN/13	Social Infrastructure Needs Study	Support wording in the IDP regarding the role of A+E at Charing Cross Hospital supporting growth in the OPDC area.	1	London Borough of Hammersmith and Fulham	Noted
2/SIN/14	Social Infrastructure Needs Study	Concerned at proposals for stacking of residential use above schools, and feel the proposed Community Review Group should have a wider role on reflecting on appropriate building typologies.	1	Grand Union Alliance	<p>No change proposed. The Study recognises that co-locating residential and social infrastructure uses is appropriate in the context of the high density community being provided in Old Oak, and that the approach provides other benefits in terms of integration with other land uses.</p> <p>The role of the Community Review Group is to review and discuss development proposals and provide views to inform decisions made by OPDC and the OPDC Planning Committee. The group will be able to provide views on specific typologies such as mixed residential and social infrastructure provision when proposals for such schemes are brought forward.</p>



## Tall Buildings 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
2/TBS	Tall Buildings Statement	Assessment of visual impacts is not sufficient	1	London Borough of Hammersmith and Fulham	<p>No change proposed. The methodology for defining a tall building within the OPDC area is set out in OPDC's Tall Building Statement. This meets the requirements of Draft New London Plan Policy D8 and paragraph 3.8.2 in relation to the evolving context of Opportunity Areas. The approach is in general conformity with the existing and Draft New London Plan. Visual impacts relate to a considered balance of elements including views, spatial hierarchy of the surrounding context, legibility and wayfinding, architectural quality, heritage assets and glare. Some of these elements are considered to be appropriate to inform plan making at a strategic scale and some are more appropriate to inform the development management process at a site scale. The below information relates to those elements OPDC considers to be appropriate at a strategic scale to inform the Local Plan. Where relevant, rationale for why elements have not been considered is provided.</p> <p>OPDC's Views Study provides a baseline study of views within and surrounding the OPDC area. It identifies important views and provides recommendations and guidelines to shape future development. The views include panoramic views, kinetic views, local views from publicly accessible open spaces, linear views and heritage views. Information and considerations in this statement identify locations within the OPDC area where tall buildings are an appropriate form of development in principle. Proposals for tall buildings will be assessed in light of their impact on the views set out in OPDC's Views Study and any other identified relevant views. Scrubs Lane benefits from a Strategic Views Assessment which</p>

Comment reference	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>has guided the location of the individual tall buildings within this place. Further assessments may be undertaken to inform future versions of the Local Plan and Supplementary Planning Document reflecting the evolving context of the OPDC area.</p> <p>Old Oak will be a major transport hub providing excellent access to new national, regional and local public transport services. It will also be home to a new commercial centre for London, a new major town centre and a range of destination and catalyst uses. Therefore, tall buildings will enable Old Oak to reinforce the spatial hierarchy of the local and wider context by aiding legibility and wayfinding to these nationally and regionally significant destinations.</p> <p>Figure 3 depicts the sensitive locations within and around the OPDC area. These include heritage assets, publicly accessible open spaces and existing residential neighbourhoods. These locations have been used to inform the locations where tall buildings will be an appropriate form of development in principle.</p>

## Land at Abbey Road

Comment reference	Section of Local Plan comment relates to	Issue Summary	Number of consultees who raised issue	Name of consultees who raised the issue	OPDC Response
2/LARS	The Land at Abbey Road Study	Would like to note that the Report will be challenged with respect to how the appraisal options have been appraised in particular subjective assumptions made and the lack of clear market evidence and inconsistency in terms of quantum of development. The conclusion set out in paragraph 9.6 is challenged and it is questioned why the report has been prepared in isolation from any dialogue with the owners or their advisors.	1	Ashia Centur Limited	Noted. The Land at Abbey Road Study is considered to be a robust supporting study for the Local Plan. It was published as part of the public consultation to allow the opportunity for interested stakeholders to comment on its contents.

## Victoria Road and Old Oak Lane Development Frameworks 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
2/VRDFP	Victoria Road and Old Oak Lane Development Framework Principles	Figures do not clearly show whether routes into Wormwood Scrubs are walking and cycling only.	1	Wormwood Scrubs Charitable Trust	No change proposed. All images in the Victoria Road and Old Oak Lane Development Framework Principles are indicative. Local Plan policy P12 and supporting diagram shows access routes in clearer detail.

## Views 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
2/VS/1	Views Study	View 5 - Mitre Bridge is essentially invisible. Therefore view is not useful for enable an individual to appreciate it. Information regarding the bridge should be relocated to View 31 relating to views along the canal.	1	Boropex Holdings Ltd	No change proposed. The Mitre Bridge can be clearly seen within View 5 and will continue to be references within the view information.
2/VS/2	Views Study	Heritage views should include views from Wormwood Scrubs looking north and north west.	1	Wormwood Scrubs Charitable Trust	<p>No change proposed. The heritage views were selected based on a robust analysis considering:</p> <ul style="list-style-type: none"> <li>• Views of heritage assets, either buildings or areas where the subject has some landmark significance and relevance from a place-making perspective.</li> <li>• Views of building silhouettes or profiles where the importance of the sky should be recognised.</li> <li>• Views of several buildings as a group.</li> <li>• Panoramic views.</li> <li>• Sequential views which emerge along a route or passage e.g. the canal.</li> <li>• General views from Wormwood Scrubs</li> </ul> <p>Policy D7 identifies an open space view from Wormwood Scrubs which includes views north and north west.</p>

## Waste in Tall Buildings 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
2/WTB/1	Waste in Tall Buildings	The study identifies a series of challenges relating to waste management in tall buildings which require significant engagement and management processes. Lower rise buildings would be a simpler and equally valid suggestion.	1	Grand Union Alliance	No changed proposed. Tall buildings have been identified as appropriate in principle in locations across the OPDC area to assist in delivering the identified homes and jobs targets set by the London Plan. The study provides guidance in how the challenges in achieving the Mayor's waste recycling standards in higher density developments can be overcome.
2/WTB/2	Waste in Tall Buildings	The study identifies a series of challenges relating to waste management in tall buildings which require significant engagement and management processes. Lower rise buildings would be a simpler and equally valid suggestion.	1	Grand Union Alliance	No changed proposed. Tall buildings have been identified as an appropriate form of development in principle in locations across the OPDC area to assist in delivering the identified homes and jobs targets set by the London Plan. The study provides guidance in how the challenges in achieving the Mayor's waste recycling standards in higher density developments can be overcome.

## Willesden Junction Station Feasibility 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
2/WJSF/1	Willesden Junction Station Feasibility Study	Re-assertion of reg19 (1) comment that Willesden Junction Station Feasibility Study is unsound.  Population growth means that more frequent services and a better interchange at Willesden Junction needs to be provided	1	John Cox	Noted. The Willesden Junction Station Feasibility study looked in detail at passenger demand and capacity and modelling ten demand scenarios which are detailed in the study.  No change proposed. OPDC produced this study in collaboration with TfL and LB Brent and with support from Network Rail who own the station. As such the approach is considered to be sound.
2/WJSF/2	Willesden Junction Station Feasibility Study	Untenable for the OPDC Local Plan NOT to plan for major expansion of Willesden Junction station, with passive provision for the upgrades	1	John Cox	No change proposed. The Local Plan refers to the improvement proposals set out in the supporting study.
2/WJSF3	Willesden Junction Station Feasibility Study	Low level station - There must be no intervention that destroys the existing four platform arrangement. The recent low-grade building on one of the bay platforms can be removed. Both bays can be extended to become through tracks, a possibility surely envisaged when that part of the station was designed in 1912.	1	John Cox	No change proposed. Providing platforms on the fast lines or relief lines has not been considered to date. Analysis would be required to determine whether there is a case for providing these platforms. It is unlikely that there would be a case to call fast line services at 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
2/WJSF/4	Willesden Junction Station Feasibility Study	High level station suggestions for Willesden Junction Station provided.	1	John Cox	Noted. This information will be used to inform further feasibility studies of station enhancements.
2/WJSF/5	Willesden Junction Station Feasibility Study	Mainline station suggestions for Willesden Junction Station.	1	John Cox	Noted. This information will be used to inform further feasibility studies of station enhancements.

# Appendix K

**Organisations invited to make representations on the second Regulation 19 (2) Draft Local Plan in summer 2018.**

Organisation
Aedas
Anderson Wilde & Harris
ARK Bentworth Primary Academy (London Borough of Hammersmith & Fulham)
Asda
Asserson
Aston
Atkins Limited
Aurora Property Group
Balfour Beatty
Battersea Power Station Development Company (BPSDC)
BBC
Bechtel
Bedford Borough Council
Benoy
Boden
Bracknell Forest
Brent Cyclists
Brent, Harrow, Hillingdon and Ealing CCGs
Brighton and Hove Council
British Embassy Beijing
Brown & Mason Limited
Buckinghamshire County Council
Burlington Danes Academy (London Borough of Hammersmith & Fulham)
Cambridgeshire County Council
Canal & River Trust
Capita
Capital PIP
Catch 22
CBRE
CBRE Hotels
Central Bedfordshire

Organisation
Central London, West London, Hammersmith & Fulham, Hounslow and Ealing CCGs (CWHHE CCGs)
CgMs
CH2M
Chiltern Railways
Chris Blandford Associates
City & Docklands
City of London Corporation
City of Westminster
Civil Aviation Authority
CLAD
CLAUK
Construction Products Association
Cothill Educational Trust
Curtins
Custard Factory
Day Lewis Planning Ltd
Deloitte
Department for International Trade
Department for Transport
Diageo
Diocese of London
Dorset County Council
Ealing CCG
East Acton (Ealing)
East Sussex County Council
Ecotricity
Enabling Projects (Town Planners)
English Heritage
Environment Agency
Epsom & Ewell Council
ESI
Essential Living
Essex County Council
European Metal Recycling Ltd (EMR)
evo seccus
Family Mosaic



Organisation
Foreman Roberts
Forty Shillings
Friends of Wormwood Scrubs
Furness Primary School (London Borough of Brent)
Genesis Housing Association
Gensler
GL Hearn
Global Guardians
Greater London Authority
Hammersmith & Fulham CCG
Hammersmith & Fulham Liberal Democrats
Hammersmith and West London College
Hammersmith BID
Hamon Investment Group
Hampshire
Hanger Hill East and Hanger Hill Garden Estate Residents Associations
Harlesdon Neighbourhood Forum
Haylock Planning and Design
Health and Safety Executive
Heathrow Airport
Hertfordshire County Council
High Speed Two Limited
Highways Agency
Hilti (Gt. Britain) Ltd
Historic England
HOK
Homes England
House of Lords
Howard Kennedy
IFC Group
Imperial College
Imperial College London
INSTINCTIF
Isle of Wight
Italian Furniture, Carpet & Flooring
I-UK
John Perryn Primary School (Ealing)
Kenmont Primary School (London Borough of Hammersmith & Fulham)
Kent County Council

Organisation
Knowsley Council
LatinElephant
Lincolnshire Council
Line Planning Ltd
Local Government Association
London & Continental Railways Limited
London & Regional Properties
London Assembly Planning Committee
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 Hackney
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 Kingston
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 Citizens
London Docklands Development Corporation (former)
London Legacy Development Corporation

Organisation
London Sustainable Development Commission
London Theatre Company
London Underground
London Waste Planning Forum
Longford Trust
Luton Borough Council
Marine Management Organisation
Martell Electronics Ltd
MBA Architects Ltd
Medway
Medway Council
Metropolitan Police Service
Midland Terrace Residents Association
Milton Keynes
Ministry of Housing, Communities and Local Government
Mosaic Housing
Mount Anvil
Museum of London Archaeology (MOLA)
Natural England
Natural History Museum
Network Rail
Network Rail, High Speed Rail Development
NHS England
NHS North West London (Collaboration of 8 CCGs)
Norfolk County Council
North Kensington Gate
North Lincolnshire Council
North London Waste Plan
North Yorkshire County Council
Northamptonshire County Council
NQP Development Services
Ocean Media
Office of Rail and Road
Ogilvie Geomatics Ltd
Only Connect and West London Zone
Oxfordshire County Council
Park Royal Business Group
Pentecostal City Mission Church
Peterborough City Council

Organisation
PHE (London)
Plowman Craven
Portsmouth
Powerday
QPR
Quad
Rail Exec
Reading Borough Council
Regents Network
Reigate & Banstead
Respect Care
Rise
Robert Bird Group
Royal Borough of Greenwich
Royal Borough of Kensington & Chelsea
Royal Borough of Kingston Upon Thames
Royal Borough of Windsor & Maidenhead
Savills
Scanprop Development, Stockholm
Scenario Architecture
Science Museum Group
SEGRO
Shepherd's Sandwich Bar
Skanska
Slough Borough Council
Southampton City Council
Southend on Sea Borough Council
Sport England
St. Quintin and Woodlands Neighbourhood Forum
Stadium Capital Holdings
Stonebridge (Brent)
Suffolk County Council
Surrey County Council
Sutton Council
Thames Valley Harriers / Linford Christie Stadium
Thames Water
The Daylight Company Ltd
The Foundary
The Hammersmith Society

Organisation
The HOK Planning Group
The Hyde Group
The Power Station
Thesqua
Thurrock Council
TITRA
Transport for London
UK Regeneration
UK Trade & Investment
UKTI British Consulate
Urban Legacies Limited
Useful Simple Projects
Velocity
Wawickshire County Council
We Care Foundation
West Berkshire
West Ealing BID
West London Alliance
West London Business
West London Waste Authority
West Sussex County Council
Western Riverside Waste Authority
WestTrans
Whitedrake
Wiltshire Council
Wokingham Council
Worcestershire Council
Wormoholt and White City Neighbourhood Forum

## Appendix L


Copies of Regulation 19(2) Consultation Material

Email sent to all consultees on OPDC's consultation database

Lots of ways to have your say and get involved | Can't see the images? [View online](#)

**OPDC**  
OLD OAK AND  
PARK ROYAL  
DEVELOPMENT  
CORPORATION

**LOCAL PLAN**  
Second Revised Draft for Regulation 19 (2) Consultation  
14 June 2018



**MAYOR OF LONDON**

### The Local Plan consultation is now live

As the local planning authority for the area, a key part of our duty includes the production of a Local Plan, a document that sets out the vision and policies for development and regeneration in the Old Oak and Park Royal area.

We want to make sure that through this document, both current and future residents and businesses benefit from the significant investment in the area, as well as the new transport links provided by High Speed 2 and the Elizabeth line (formerly Crossrail).

Thursday

14

**The second revised draft Local Plan consultation will run from Thursday 14 June to midnight on Monday 30 July 2018**

The OPDC Board met this week and agreed to launch the second Regulation 19 revised draft Local Plan consultation.

To date, we've published and consulted on two drafts of the Local Plan:

- Regulation 18 draft Local Plan (February to March 2016) and
- Regulation 19 revised draft Local Plan (June to September 2017)

Following your consultation responses in 2017 and in light of the updated and new supporting studies, we've made amendments to the revised draft Local Plan. We've also reflected policies from the Draft New London Plan and the changes made to national planning guidance, which we must adhere to.

We'll be [holding presentation events](#) during the consultation period to give you the opportunity to speak to OPDC officers and find out more about the amendments to the revised draft Local Plan. The legal requirements and technicalities for this consultation were [set out in a letter](#) being sent to over 40,000 residents and businesses in and around the area.

[Read more about the consultation online](#)

## Old Oak and Park Royal needs you

Help shape your area by applying to be on the Community Review Group



*"The Community Review Group is **an exciting new local initiative** for people living, working, studying and playing in and around Old Oak and Park Royal. **It is vital that the local community is involved in helping to design, build and create a great place for future generations.** I hope many people will apply to join the group, especially those who have never done anything like this*

*before. In creating a vibrant new area of north west London, we need and want to hear what you have to say.”*

Liz Peace CBE, Chairman of OPDC

The Community Review Group will be part of OPDC’s plan to ensure that new developments are of the highest possible quality, whilst also empowering local people to have your say about the urban design process, including housing, transport, public spaces and environment.

### **What are the benefits?**

We'll provide you with any support needed for your role as a Group member through free training in areas such as reading plans, understanding development proposals or getting your views across in meetings. Travel expenses will be available. Being a Group member offers the opportunity for you to add to CV, learn about your area, take an active role in change and help to leave a legacy.

This is a great chance to be involved in shaping your area for future generations and be a voice for your community.



[Find further details on the Community Review Group & how to apply](#)

## **Introducing your new Senior Engagement Officer**



**Anna Shamoon**

I've been working with communities in London for 10 years and have a real passion for grassroots engagement and making sure people's voices are being heard.

If you have any questions, comments or just want to say hi, [send me an email](#).

For the past five years I've worked for Peabody Housing Association, in the Landscape and Regeneration team, to involve the community in planning, open space improvements and placemaking. I believe that it's so important for local history and knowledge to be sought, understood and incorporated into the design process to create a real sense of ownership and connect communities. I'm really excited to be involved in the communities in Old Oak and Park Royal and to meeting and working with you.

## We're recruiting

### Great Place Scheme - Community Organiser

Are you passionate about helping people become more involved in shaping and improving their local area? Experienced in working with diverse groups to build capacity, confidence and new skills?

If so, this role would suit someone keen to explore how a world class arts programme could provide new ways of collaboration and participation in London's most vibrant industrial area.

**Deadline is 21 June 2018. [Find out more.](#)**

### Great Place Scheme - Project Support Officer

We're looking for someone experienced in arts administration, production and project delivery. This is an exciting opportunity for a highly-organised individual to play a key role in the delivery of a world class arts and culture programme at one of London's largest regeneration areas.



You'll provide administrative and project-related support for an ambitious, community-focused arts and culture programme.

**Deadline for applications is 21 June 2018. [Find out more.](#)**

### **Great Place Scheme - Programme Manager (maternity cover)**

We have a fantastic opportunity for a talented individual to join our team on a temporary contract covering a period of maternity leave. Apply to lead the OPDC's Great Place Programme and help shape the future of Old Oak and Park Royal.

**Deadline for applications is 1 July 2018. [Find out more.](#)**

### **Senior Marketing and Events Officer (maternity cover)**

Passionate about people, communications and engagement? Experienced in the planning and delivery of marketing communications and events for a sizeable and high-profile development/regeneration/infrastructure project? We have a fantastic opportunity for a talented individual to join our team on a temporary contract covering a period of maternity leave.

**Deadline for applications is 1 July 2018. [Find out more.](#)**

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## **Partner updates**

### **Crowdfund London**

Crowdfund London, developed by the Regeneration team at City Hall, gives anyone the opportunity to pitch new ideas - big or small - for community-led projects to make their local area even better. They're [holding workshops across London](#) to help communities find out how they can apply for grants.

### **High Speed 2 Ltd (HS2)**

#### **Route wide website**

[HS2 have launched a route wide website](#) providing information on the phasing of delivery and other relevant topics.



## Complaints Procedure

If you're having any issues with the HS2 in the Old Oak and Park Royal area, please [follow the guidance online](#) to make a complaint.

## Find us online



### We're on Instagram



Follow us on here for great pictures and stories of the Old Oak and Park Royal area



Follow on Instagram

Email reminder

Make sure you submit your comments by midnight on 30 July 2018 | Can't see the images? [View online](#)

**OPDC**  
OLD OAK AND  
PARK ROYAL  
DEVELOPMENT  
CORPORATION



**Hello Alexandra ,**

Thank you for your interest in the Local Plan consultation for the Old Oak and Park Royal area.

This is just a quick email to let you know that all the presentations from the second revised draft Local Plan consultation are now available to view online, so if you weren't able to attend one or all of the events, or wanted to review the slides before submitting your comments you can do so.

To help you get to this page and the other most popular related sections of the website, here is a helpful list:

- [Presentations](#)
- [Revised draft Local Plan and chapters](#)
- [Supporting studies](#)
- [How to respond](#)

Monday

30

**Monday 30 July at midnight**

Please make sure you've submitted your comments by the deadline.

If you submitted comments during the first Regulation 19 consultation in 2017, these comments will continue to be valid and will be submitted along with any new responses. If you have no comments on the amendments to the revised draft Local Plan or the new or updated supporting studies you don't need to do anything further.

We look forward to receiving your comments.

With best wishes,

The OPDC team

## Find us online



### We're on Instagram



Follow us on here for great pictures and stories of the Old Oak and Park Royal area.



Follow on Instagram

### 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](#)

Copy of letter sent to local residents and businesses



14 June 2018

Dear occupant,

**Have your say on proposed amendments to OPDC's revised draft Local Plan**

The Old Oak and Park Royal Development Corporation (OPDC) was established by the Mayor of London in 2015 to oversee the delivery of new homes and jobs in Old Oak and Park Royal. As the local planning authority for the area, a key part of our duty includes the production of a Local Plan, which sets out the vision and policies for development and regeneration. We want to make sure that through this document, both current and future residents and businesses benefit from the significant investment in the area, as well as the new transport links provided by High Speed 2 and the Elizabeth line (formerly Crossrail).

To date, we have published and consulted on two drafts of the Local Plan; the Regulation 18 draft Local Plan (February to March 2016) and the Regulation 19 revised draft Local Plan (June to September 2017). We've made amendments to the revised draft Local Plan following your consultation responses in 2017 and in light of the updated and new supporting studies. We have also reflected policies from the Draft New London Plan and changes made to national planning guidance, which we must adhere to.

Due to these changes, OPDC is carrying out a second Regulation 19 consultation. This means your responses should focus on the amendments in the second Regulation 19 revised draft Local Plan and the new and updated supporting studies. If you provided comments on

the first Regulation 19 consultation, these comments will continue to be valid and will be submitted to the Secretary of State for the Ministry of Housing and Local Government, alongside responses to this second Regulation 19 consultation. If you have no comments on the revised draft Local Plan amendments, or the new or updated supporting studies, you don't need to do anything further.

Following a number of conversations with local residents and businesses, we have produced a 'track changed' e-copy of the second Regulation 19 revised draft Local Plan to show the changes made since the first Regulation 19 revised draft Local Plan consultation. Additionally, there is an unmarked document available online for ease of reading.

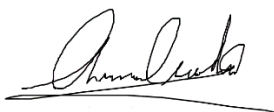
When responding, please use the criteria set out on the Local Plan section of the OPDC website to demonstrate whether the amendments to policies in the second Regulation 19 revised draft Local Plan have been: positively prepared, are justified, effective and/or are consistent with national and regional policy.

We'll be holding presentation events during the consultation period to give you the opportunity to speak to OPDC officers and find out more about the amendments to the revised draft Local Plan. The legal requirements and technicalities for this consultation are set out overleaf.

Full details, presentation dates and further information about the consultation is available online at: [www.london.gov.uk/OPDClocalplan](http://www.london.gov.uk/OPDClocalplan).

If you have any questions regarding the purpose of the Local Plan, how to respond to the consultation or details about our presentation events, please visit [www.london.gov.uk/OPDClocalplan](http://www.london.gov.uk/OPDClocalplan). Alternatively, contact OPDC via email on [localplan@opdc.london.gov.uk](mailto:localplan@opdc.london.gov.uk) or calling 020 7983 6520.

Yours sincerely,



Tom Cardis

Interim Assistant Director of Planning (Planning Policy, Design and Park Royal)  
Old Oak and Park Royal Development Corporation

**PUBLIC CONSULTATION**  
**(Second revised draft Local Plan)**

**Planning and Compulsory Purchase Act 2004 and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 – Second 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 second revised draft version of the Old Oak and Park Royal Local Plan for public consultation.

**Title of the Document:**

The OPDC second 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 and regenerated over the next 20 years.

This document is the Regulation 19 second revised draft Local Plan and includes amendments made to the previous Regulation 19 revised draft Local Plan published for consultation June to September 2017.

### **Subject Matter and Area of the Development Plan Document:**

The second 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.

Representations and responses are being sought on the amendments to the revised draft Local Plan set out in the second revised draft Local Plan alongside new supporting studies and updates to supporting studies.

### **Period within which representations and responses need to be made:**

Thursday 14 June 2018 until midnight on Monday 30 July 2018.

### **How to comment and have your say:**

Make comments on the amendments set out in the second revised draft Local Plan and new and updated supporting studies using one of the below methods, please provide your full name and contact details:

- **Email:** [localplan@opdc.london.gov.uk](mailto: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 their comments; and/or
- When the policies have been adopted.

### **How to find out more:**

The second revised draft Local Plan and supporting studies may be viewed online at: [www.london.gov.uk/OPDClocalplan](http://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 NW10 8SE
- The Collective, Old Oak Lane NW10 6FF

Alternatively, hard copies of the second revised draft Local Plan can be made available on request by contacting OPDC, either via email or by post (see contact details above).

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### Consultation presentation events

Date and Time	Venue	Draft Local Plan Focus
<b>Thursday 21 June</b> Join us for the presentation at 6.45pm to - 8:30pm <a href="#">Register to attend</a>	The Collective Old Oak Old Oak Lane London NW10 6F	<b>Design and Environment</b>
<b>Wednesday 27 June</b> Join us for the presentation at 6.45pm to - 8:30pm <a href="#">Register to attend</a>	The Collective Old Oak Old Oak Lane London NW10 6F	<b>Old Oak North and Transport</b>
<b>Thursday 5 July</b> Join us for the presentation at 6.45pm to - 8:30pm <a href="#">Register to attend</a>	The Collective Old Oak Old Oak Lane London NW10 6F	<b>Town Centre Uses and Social Infrastructure</b>
<b>Thursday 12 July</b> Join us for the presentation at 6.45pm to - 8:30pm <a href="#">Register to attend</a>	The Collective Old Oak Old Oak Lane London NW10 6F	<b>Park Royal and Employment</b>

### Pre-consultation event

Prior to the formal start of the consultation, we held a pre-consultation event to explain the second Regulation 19 consultation, highlighting the key changes and explaining how to respond. The event took place on Thursday 24 May 2018, 6:30pm to 8:00pm at All Souls Church, Harlesden.

Register to attend the consultation events

### Being clear and transparent

In order to be clear and transparent and to show what sections of the revised draft Local Plan have changed, we will be producing a 'tracked changed' version of the second Regulation 19 revised draft Local Plan. It will be published at the start of consultation to show the changes that have been made since the first Regulation 19 revised draft Local Plan consultation.

We will also be creating a 'clean' copy of the second Regulation 19 revised draft Local for ease of reading.

### Previous submitted comments

If you provided comments on the first Regulation 19 consultation, these comments will continue to be valid and will be submitted to the Secretary of State for the Ministry of Housing, Communities and Local Government, along with any new responses to the second Regulation 19 consultation.

If you have no comments on the amendments to the revised draft Local Plan or the new or updated supporting studies no further action is required.

### 2nd Reg 19 How to respond

Find out how you can respond to the second revised draft Local Plan and associated documents consultation.

Copy of public notice



