

# Statement of Consultation

## For Regulation 18, First Regulation 19 & Second Regulation 19 Consultations

October 2018



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# 1 INTRODUCTION

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

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

## Local Plan

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

*Figure 1: Local Plan Timetable*



## **Statement of Consultation**

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

- Regulation 18 consultation
- Regulation 19(1) consultation (first round)
- Regulation 19(2) consultation (second round)

### Regulation 18 consultation

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

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

### Regulation 19 consultation

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

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

1.8 Because of the representations made to the first Regulation 19 consultation, publication of the Draft New London Plan, new and updated supporting studies and changes to national and regional infrastructure priorities, OPDC made significant changes to the text and evidence base supporting the draft Local Plan and therefore undertook a second Regulation 19 public consultation from 14 June to 30 July 2018. This allowed stakeholders to comment on the changes that have been made to the draft Local Plan, in advance of the Independent Examination.

1.9 Each issue summary from the Regulation 19(2) consultation is provided with a reference number. Where amendments to the Local Plan were proposed in response to an issue summary, this reference number is provided with the relevant amendment in the Schedule of Minor Modifications document to be submitted to the Inspector.

## **Statement of Community Involvement**

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

- Inviting statutory and general consultees, residents and businesses in the OPDC area to comment on what the Local Plan should contain during a public consultation for a minimum of 6 weeks;
- Consulting bodies listed in the relevant regulations on the scope of the information and level of detail that should be included in the environmental report which accompanies the draft Local Plan. The environmental report addresses the requirements of the European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.
- Emailing and writing to members of the consultation database throughout the Local Plan's preparation;
- Making consultation documents and questionnaires available on its website, at City Hall and public libraries;
- Holding meetings, discussion events and drop-in events / exhibitions;
- Issuing a statutory press notice, advertises in local press, uses the OPDC email newsletter and its social media sites to raise awareness.

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

## 2 REGULATION 18 CONSULTATION

### Overview of Consultation

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

### Publication and Accessibility of Consultation

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

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

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

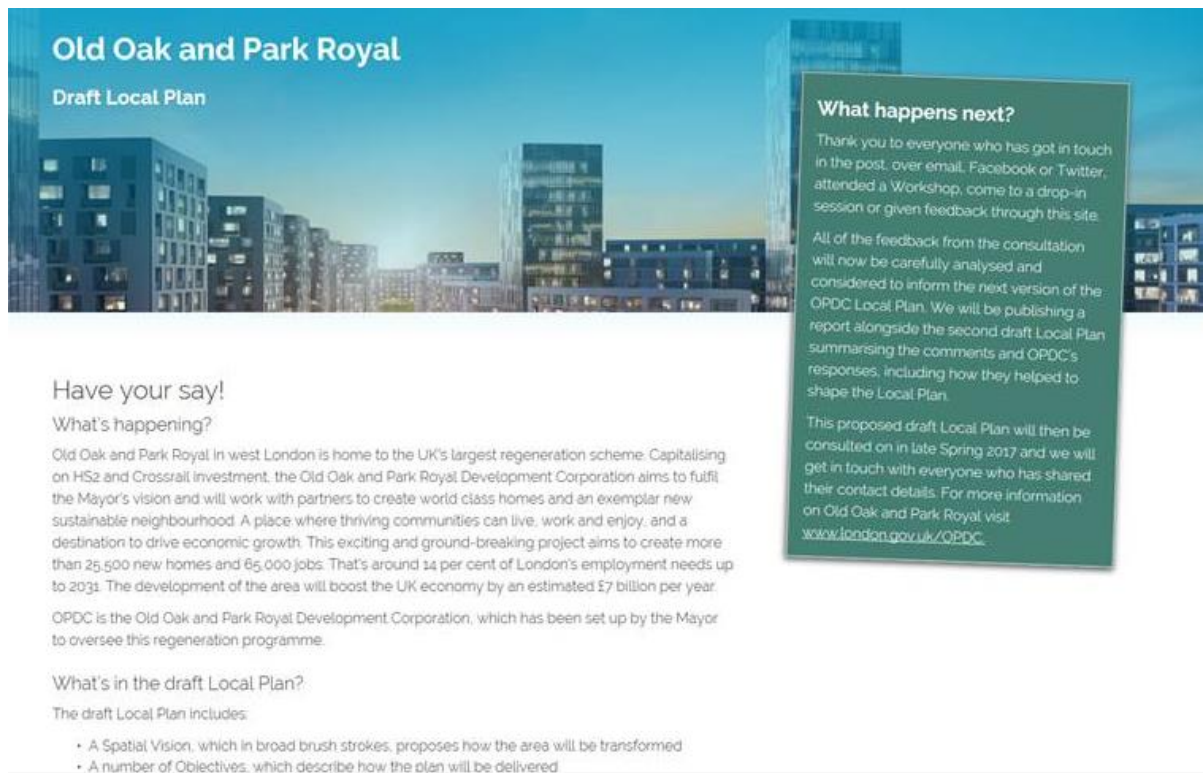
*Figure 2: Boundary of Letter Drop Area*



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



Figure 3: Regulation 18 Local Plan Consultation Website



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

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

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



## Consultation Activities

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

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

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

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

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

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

### Level of Response

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

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

## Summary of Key Response Themes

- 2.9 The consultation response resulted in over **7,000 total individual responses**. Having assessed each individual response, OPDC has identified **2,300 issues themes** arising from these responses. Appendix B outlines each of these issues, and clarifies whether or not this has resulted in a change in the Regulation 19 Draft Local Plan.
- 2.10 Given the large number of issues raised, OPDC has identified a list of 155 Key Issues. The key issues summary is included in Appendix A, and highlights which respondents raised the issue and what actions (if any) OPDC have undertaken to address the issue.
- 2.11 To further distil the outputs of the consultation response, 27 subject themes have been identified, as outlined in Table 3. The bracketed numbers within Table 3 highlights the relevant key issues within Appendix A to which each theme relates to.
- 2.12 In both Appendices A and B, details have been provided on the stakeholders who raised each respective issue. Individuals' names have been anonymised as either a 'local resident' or 'local business'. Comments on OPDC's Online Engagement Platform, run by a company called Commonplace, have been anonymised as 'commonplace' and comments made at Local Plan drop-in events and workshops have been anonymised as 'workshop' comments.

*Table 3 Key Issues Subject Themes*

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

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

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

## **3 REGULATION 19 (1) CONSULTATION**

### **Overview of Consultation**

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

### **Publication and Accessibility of Consultation**

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

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

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

*Figure 4: Boundary of Letter Drop Area*



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



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

Secure | <https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/opdc-revised-dra>

**MAYOR OF LONDON** **LONDONASSEMBLY** Search...

? What we do > In my area > Get involved > About us > Have your say > Media centre >

### How to respond to the revised draft Local Plan & associated documents

The public consultation on the revised draft Local Plan and associated documents runs from 29 June until midnight on 11 September 2017.

- [How to have your say and submit your comments](#)
- [How your information will be used](#)
- [What to consider when responding to the Local Plan](#)
- [View hard copies of the draft Local Plan](#)
- [Be kept informed on the next stages](#)

#### How to have your say and submit your comments

To make comments on the revised draft Local Plan, supporting studies, the revised draft Validation Checklist and Brownfield Land Register (BLR), please use one of the following methods, providing your full name and contact details:

- [Online response form](#)
- [Email](#)
- **Post:** Local Plan Consultation, Old Oak and Park Royal Development Corporation, City Hall, Queen's Walk, London SE1 2AA


#### How your information will be used

Due to the process of having an Independent Examination, any information and/or responses made are not confidential. This means we need your name, or company name, so that the comments can be made available for the public inspection. Once your comments have been logged, all names, company names and associated comments submitted as part of the formal consultation process will be made available to view on the OPDC website. OPDC will not share or publish post codes or email addresses.

#### What to consider when responding to the Local Plan


OPDC is required to submit the Local Plan to the Secretary of State for an Independent Examination. This process involves an independent inspector, appointed by the Secretary of State, whose role in the examination process is to assess whether the Local Plan has been prepared in accordance with:

- Duty to Cooperate (a duty to try and agree approaches with key public sector bodies on strategic cross boundary matters)
- legal and procedural requirements
- whether it is 'sound'




### Stages of the Local Plan

Find out more information on the process for preparing a Local Plan for Old Oak and Park Royal.



### OPDC Supporting Studies

Read the supporting studies which have been used to develop the revised draft Local Plan.



### OPDC consultation events

Find out about the events we held during the consultation.

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

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

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

Figure 6: Online Response Form

The screenshot shows a web browser window with the URL <https://www.surveymozmo.eu/s3/90037292/2e962edff045>. The page header includes the OPDC logo (Old Oak and Park Royal Development Corporation) and the title "OPDC revised draft Local Plan Consultation". The form is titled "SP1 Catalyst for Growth" and contains three sections of questions. Section 6 asks "Do you consider this policy to be..." with two columns: "Sound" and "Unsound". Section 7 asks "Do you consider this policy to be..." with two columns: "Yes" and "No". Section 8 asks "What are your reasons for this? What changes would you like made to address this? (Please be as precise as possible, with reference to paragraph and policy numbers)". At the bottom, there are "Back" and "Next" buttons and a progress bar showing 3% completion.

Secure | <https://www.surveymozmo.eu/s3/90037292/2e962edff045>

Save and continue later

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

## OPDC revised draft Local Plan Consultation

### SP1 Catalyst for Growth

6. Strategic Policies - SP1 Catalyst for Growth  
Do you consider this policy to be...

|                                  | Sound                 | Unsound               |
|----------------------------------|-----------------------|-----------------------|
| Positively prepared?             | <input type="radio"/> | <input type="radio"/> |
| Justified?                       | <input type="radio"/> | <input type="radio"/> |
| Effective?                       | <input type="radio"/> | <input type="radio"/> |
| Consistent with national policy? | <input type="radio"/> | <input type="radio"/> |

7. Do you consider this policy to be...

|   | Yes                   | No                    |
|---|-----------------------|-----------------------|
| Legally compliant?                        | <input type="radio"/> | <input type="radio"/> |
| In accordance with the Duty to Cooperate? | <input type="radio"/> | <input type="radio"/> |

8. What are your reasons for this? What changes would you like made to address this? (Please be as precise as possible, with reference to paragraph and policy numbers)

[Back](#) [Next](#)

3%

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

## Consultation Activities

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

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

*Table 4: Details of drop-in and presentation events*

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

## Level of Response

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

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

## Summary of Key Response Themes

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

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

*Table 5 Key Issues Subject Themes*

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

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

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



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

## 4 REGULATION 19(2) CONSULTATION

4.1 Normally, a local planning authority would only carry out a single Regulation 19 consultation. However, as significant changes were made to the first Regulation 19 draft local Plan, and its supporting studies, a second additional Regulation 19 public consultation was carried out to provide the following benefits:

- a. To enable stakeholders to have a say on the changes that have been, made to the draft Local Plan in advance of the Independent Examination; and
- b. To potentially reduce the complexity and length of the independent examination, as OPDC has been able to address a number of concerns raised on the first Regulation 19 draft Local Plan.

4.2 Consultation was carried out in accordance with Regulation 19 of the Town and Country and Planning (Local Planning) (England) Regulations 2012 for a 6 week period between 14th of June to midnight on 30th of July 2018.

### Overview of Consultation

#### Publication and consultation activities

4.3 The Regulation 19(2) consultation was publicised by the following means:

- Public notices published within local newspapers- Brent and Kilburn Times, Ealing Gazette and Harrow Times;
- Newsletter distributed to over 40,000 residents;
- Hard copies of the Local Plan and supporting studies provided at the following advertised locations;
  - a. Brent Civic Centre, Engineers Way, Wembley HA9 0AF
  - b. City Hall, Queens Walk, London SE1 2AA
  - c. Ealing Council offices, Perceval House, 14/16 Uxbridge Road W5 2HL
  - d. Hammersmith Town Hall, King Street W6 9UU
  - e. Harlesden Library, NW10 8SE
  - f. The Collective, Old Oak Lane, NW10 6FF
- Emails sent to Statutory Consultees and Duty to Cooperate contacts, and contacts listed on OPDC's Local Plan consultation database. This was carried out in accordance with the General Data Protection Regulations which came into force after the first Regulation 19 consultation;

- A pre-consultation stakeholder event and 4 drop in events hosted during the public consultation and held at the Collective, Old Oak Lane NW10 6FF. The drop in events focused on the key changes made to the first Regulation 19 consultation; (see table 6 below)
- Regular updates on the consultation and activities provided in OPDC's website and regular social media announcements on Twitter, Facebook and LinkedIn.

4.4 Examples of the consultation material used in the Regulation 19(2) consultation can be found in Appendix L

4.5 The consultation focused on the changes made to the first Regulation 19 draft local Plan and changes to existing and new supporting studies. In addition to the fully designed Local Plan, an annotated track changes version was published that identified changes and identified the reasons for these changes, including where these changes had been made as a result of representations received at the first stage Regulation 19 consultation.

4.6 If a stakeholder had not provided comments as part of the first Regulation 19 draft Local Plan consultation, they were still able to as part of the second Regulation 19 Draft Local Plan consultation and respondents were able to comment on parts of the Local Plan that have been unaltered between the two Regulation 19 consultations if they so wished.

*Table 6: consultation events during the second round of Regulation 19 consultation*

| Date and Time     | Venue   | Draft Local Plan Focus                            |
|-------------------|---|---|
| Thursday 21 June  | The Collective Old Oak<br>Old Oak Lane<br>London<br>NW10 6F | <b>Design and Environment</b>                     |
| Wednesday 27 June | The Collective Old Oak<br>Old Oak Lane<br>London<br>NW10 6F | <b>Old Oak North and Transport</b>                |
| Thursday 5 July   | The Collective Old Oak<br>Old Oak Lane<br>London<br>NW10 6F | <b>Town Centre Uses and Social Infrastructure</b> |
| Thursday 12 July  | The Collective Old Oak<br>Old Oak Lane<br>London<br>NW10 6F | <b>Park Royal and Employment</b>                  |

## Summary of Key Response Themes

4.7 **90 responses** were provided to the second Regulation 19 draft Local Plan consultation, comprising over **1,600 comments** resulting in over **800 issues**. Table 7 below sets out a summary of the **13 main issues** raised in the second Regulation 19 draft Local Plan consultation.

4.8 The main issues summary in Appendix I highlights which respondents raised the issue and what actions (if any) OPDC have undertaken to address the issue. All issues raised during the second Regulation 19 consultation are contained in Appendix J and what actions (if any) OPDC have undertaken to address the issue.

*Table 7: Main issues raised*

| Main issues   | Summary   |
|---|---|
| <b>Affordable Housing tenure split</b>  | Affordable Housing Tenure split should give greater priority to need for Social Rent/London Affordable Rent.  |
| <b>Additional site allocations / removal of SIL designation within Park Royal requested</b> | Request for new site allocations and removal from Strategic Industrial Location (SIL).  |
| <b>Adoption of streets</b>  | The Local Plan should be clearer that new streets should be offered to the local authorities for adoption.  |
| <b>Alternative development options</b>  | Alternative development options should be considered in the Integrated Impact Assessment  |
| <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.  |
| <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. |
| <b>Gypsy and traveller accommodation.</b>   | Additional land should be allocated to meet outstanding need for gypsies and travellers from RBKC.  |
| <b>Opposition to the continued safeguarding of Old Oak Sidings (Powerday)</b>               | Continued safeguarding will have a negative impact on local amenity.  |

| Main issues                                    | Summary   |
|--|---|
| <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).   |
| <b>Social Infrastructure Needs Study</b>       | The study methodology is questioned in relation to: <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>   |
| <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   |
| <b>Sustainable Drainage Systems (SuDS)</b>     | The Local Plan should prioritise strategic SuDS and set out clearer rate flow guidance for attenuation measures.  |
| <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. |

## 5 ON-GOING CONSULTATION

### Duty to Cooperate

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

### PLACE Review Group

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

### **Update events**

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

- An event was held on 22 November 2016, at the Co-Club in North Acton, allowing OPDC officers to provide an overview of the outcomes of the Regulation 18 consultation and update on the progression of the next draft of the Local Plan.
- In advance of the first Regulation 19 consultation, a pre-consultation event was held on 26 April 2017 providing an overview of the work undertaken in preparing the draft Regulation 19 Local Plan, and the purpose of a Regulation 19 Local Plan consultation.
- Following review of all response to the first Regulation 19 consultation, an event was held on 8 February 2018 at All Souls Church, Harlesden. This allowed OPDC officers to brief members of the public on the key issues raised as part of the consultation, likely changes to be made to the Local Plan because of these issues, and the programme for the next stages of the Local Plan.
- A second Regulation 19 draft Local Plan pre consultation event was held on the 24<sup>th</sup> May at All Souls Church in Harlesden. The event will be open to members of the public and to allow OPDC officers to outline the work undertaken in preparing the second revised draft Regulation 19 Local Plan, and the purpose of a second Regulation 19 Local Plan Consultation.

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