

Industrial Supplementary Planning Document (SPD)

1. Introduction

- 1.1 The Consultation Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 to support the adoption of the Industrial Supplementary Planning Document (SPD).
- 1.2 In accordance with the Regulations, this consultation statement sets out:
 - who was consulted during the preparation of the SPD;
 - how they were consulted;
 - a summary of the main issues raised during the consultation; and
 - how those issues have been addressed in the adopted SPD.

2. Public Consultation Process

- 2.1 In June 2023, OPDC's Planning Committee approved public consultation on the draft Industrial SPD. Public consultation took place between 12 June 2023 and midnight on 24 July 2023.
- 2.2 The SPD and supporting documents were published on OPDC's dedicated consultation platform (https://consult.opdc.london.gov.uk/industrial_spd) and hard copies were provided in the following local venues:
 - OPDC offices, 1st Floor, Brent Civic Centre, Wembley, HA9 0AF,
 - Wembley Library, Brent Civic Centre, Wembley, HA9 0AF,
 - Harlesden Library, 49 Craven Park Road, NW10 8SE,
 - Brent Hub Community Enterprise Centre, 6 Hillside, NW10 8BN,
 - The Collective, Old Oak Lane, NW1 6FF.
- 2.4 Public notices were published in local newspapers and emails were sent out to contacts on OPDC's consultation database, which included public authorities, developers and landowners, interest groups, residents' groups, and residents.
- 2.5 A drop in session was held on 1 July 2023 as part of the Park Royal Food Festival and an online consultation event was held on 6 July 2023 so that stakeholders could find out more about the SPD, speak to OPDC officers and find out how to respond to the public consultation. The event was recorded, and a video was posted on the consultation platform.
- 2.6 Comments on the SPD were able to be provided by email and post and stakeholders were also provided with a telephone number and email address in order to ask OPDC officers and questions ahead of submitting a formal response to the public consultation.

3. Public Consultation Responses

- 3.1 Consultation responses to the draft SPD were received from 17 stakeholders, comprising 225 individual issues. Table 1 below sets out who raised the issue, the issue, and a response from OPDC. If an amendment to the SPD has been made, an amendment reference has been included which corresponds with the track changed version of the SPD

and Adoption Statement, both of which can be found on OPDC's website with the other SPD documents.

4. Consultation on the SEA Screening

- 4.1 As part of the process for developing the Industrial SPD, an assessment of the requirement for a Strategic Environmental Assessment (SEA) was needed. Screening consultations were undertaken to enable the Environmental Bodies as specified in section 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 to provide comment on the appropriateness of the screening process and its conclusion for this proposed SPD.
- 4.2 Those bodies are:
 - Natural England;
 - Historic England; and
 - Environment Agency.
- 4.3 Other bodies were specifically invited to comment:
 - London Boroughs of Brent, Ealing, and Hammersmith and Fulham; and
 - Greater London Authority.
- 4.4 The screening consultation period ran for 5 weeks from 6 February 2023 to midnight on 14 March 2023.
- 4.5 Natural England responded to the SEA screening stating that they had no comments to make on the consultation or that they did not consider an assessment was required. The Environment Agency also responded and stressed the importance of being given the opportunity to advise on the guidance contained within the SPD, specifically on land contamination. The Environment Agency were invited to comment on the SPD and have made representations which are included in Table 1 below.
- 4.6 OPDC's Determination Statement for the SPD (which can be viewed on OPDC's website along with the other SPD documents) confirms that the SPD will not change or introduce new planning policy over and above the Local Plan and, whilst there may be some environmental effects, these have already been considered in principle in the Integrated Impact Assessment of the Local Plan.

Table 1: Public consultation comments and OPDC responses on the Industrial SPD

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
1	N/A	Ealing Cycling Campaign	Chapter 4	<p>Section 4 of the draft SPD opens with this statement: “4.1. Active travel and limiting unnecessary car parking are key priorities in the Local Plan and London Plan. As a consequence of this, it is expected that more journeys will be made by walking, cycling or public transport.”</p> <p>Whilst Ealing Cycling Campaign (ECC) support the objectives of Policy T3 in the OPDC approved Local Plan, it is wishful thinking to expect that more journeys will be made by cycling unless much more substantial improvements to cycling infrastructure are made than the token measures so far implemented.</p> <p>The Mayor’s Cycling Action Plan 2 published in June 2023 confirms that by far the most important factor deterring people from taking up cycling is danger (or perceived danger) from motor traffic. 82% of non cyclists give this as their main reason for not cycling.</p>	<p>No change proposed. The Industrial SPD focuses on industrial development and development that happens on/within sites so its remit does not extend to the wider movement network. OPDC is preparing a Public Realm and Green Infrastructure SPD to provide more detailed guidance on these issues. OPDC's Local Plan sets the vision and policy framework for future development for the next 20 years, up to 2038. It also sets out (in figure 7.7), an indicative future cycle network based on this timeframe. The OPDC Infrastructure Delivery Plan provides more detail on the phasing of new/enhanced cycle routes, including improvements identified to be delivered in the earlier phases of the Local Plan. It is noted that parts of the primary network shown on the ECC map are already identified as part of the OPDC indicative future cycle network. OPDC</p>

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				<p>The OPDC Local Plan includes the statement “7.21 OPDC will support the delivery of a comprehensive cycle network that improves cycle permeability throughout the OPDC area” and illustrates this at figure 7.7. It is ECC’s view that the immediate priority must be to create a primary cycling network that is less dense than that shown in figure 7.7, and will therefore be achievable sooner. The network will need to be made up of links that are “suitable for most people” using the criteria in DfT’s Local Transport Note 1-20 table 4.1.</p>	<p>are the local planning authority for the area but is not the local highways authority. Therefore, any proposals would be delivered in consultation with/approval from the host boroughs in their role as local highways authorities. OPDC is preparing a Public Realm and Green Infrastructure SPD to provide more detailed guidance related to streets, including supporting movement.</p>
2	N/A	Ealing Cycling Campaign	Chapter 4	<p>As an input to the Ealing Local Plan review that is currently underway, ECC have prepared a draft Future Cycling Network (FCN), a copy of which is attached. Also attached is a definitions sheet and an extract from the link schedule covering the OPDC area. This is currently being considered by Ealing Council. It is hoped that the node-based approach will be shared by other boroughs in west London, and with OPDC. In due course when a sufficiently good network has been created it can be signed on the ground and on</p>	<p>Noted. The Industrial SPD focuses on industrial development and development that happens on/within sites so its remit does not extend to the wider movement network. Wayfinding is an important part of OPDC's approach and is considered in Local Plan policy T3f). The implications of any changes to the wider cycling network proposed in Ealing's Local Plan on the OPDC area can be considered if and when these are developed, consulted on and adopted. The design of cycling</p>

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				maps, in the same way that is now happening across northern Europe.	infrastructure depends on a number of factors including capacity and the nature of the road/route. As these conditions vary, it is not appropriate to have specific definitions for cycle routes. OPDC is developing a Public Realm and Green Infrastructure SPD and this will identify an OPDC Street Family to generally explain and define the nature of different streets in the OPDC area.
3	N/A	Ealing Cycling Campaign	Chapter 4	This is all relevant to the Industrial SPD because the Future Cycling Network needs planning protection as sites are developed. A currently live example is the link needed between Masons Green Lane and Coronation Road (link 33-25 on the FCN plan), which will affect Network Rail and Matrix Park land that is currently zoned for Strategic Industrial and Mixed Use development. Once the Future Cycling Network has been produced for the whole OPDC area it is highly likely that other land will also require planning protection.	No change proposed. The Industrial SPD focuses on industrial development and development that happens on/within sites so its remit does not extend to the wider movement network. The adopted OPDC Local Plan sets out the indicative future cycle network and this shows an alternative cycle route (to that shown on the ECC map) that does not affect these sites. OPDC's approach means that policy objectives linked to supporting cycling, but also the need to meet housing targets, can be achieved.

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4	N/A	Ealing Cycling Campaign	Chapter 4	<p>Ealing Cycling Network plan June 2023 This plan has been prepared by Ealing Cycling Campaign (ECC) to assist the preparation of the Local Plan. The Mayor’s Sustainable Transport, Walking and Cycling LPG, November 2022 states: 3.1.1 Development Plans should identify and make provision for current and future needs for cycling, including protecting and improving existing cycle routes, and creating new strategic routes and local links and ensuring they promote safe cycling at all times of the day and night by all users. The Mayor’s Transport Strategy proposes that by 2041, 70% of Londoners will live within 400 metres of the London-wide cycle network. This suggests that in Ealing a network of primary cycle routes spaced 800m apart should be the minimum requirement. ECC have prepared this plan on that basis. It is unlikely that the resources needed to create a denser primary network will be available in the Plan period, although a number of roads not included in the network include features to assist cyclists.</p>	<p>No change proposed. The Industrial SPD focuses on industrial development and development that happens on/within sites so its remit does not extend to the wider movement network. OPDC’s Local Plan sets the vision and policy framework for future development for the next 20 years, up to 2038. It also sets out (in figure 7.7), an indicative future cycle network based on this timeframe. The OPDC Infrastructure Delivery Plan provides more detail on the phasing of new/enhanced cycle routes, including improvements identified to be delivered in the earlier phases of the Local Plan. It is noted that parts of the primary network shown on the ECC map are already identified as part of the OPDC indicative future cycle network. OPDC are the local planning authority for the area but is not the local highways authority. Therefore, any proposals would need to be delivered in consultation with/approval from the host</p>

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				<p>[A table of definitions, a plan showing the Proposed Ealing Cycling Network promoted by the Ealing Cycling Campaign (June 2023) and a schedule of links within the OPDC area]</p> <p>The Future Cycling Network routes shown on the plan may not yet come up to LTN 1-20 standards but the intention is that they will do by the end of the plan period. The Future Cycling Network does not include routes that appear to be incapable of being improved throughout their length to the LTN 1-20 standard for “suitable for most people” in the foreseeable future.</p> <p>The inclusion of any road or path as a link in the Future Cycling Network should automatically increase its priority in the council’s street maintenance programme. If upgrading to LTN 1-20 standards is done at the same time as routine maintenance and resurfacing, the overall cost should be minimised. An example is the removal of speed cushions and non-sinusoidal speed humps, the need for which has much diminished now that the whole borough is a 20mph zone.</p>	<p>boroughs in their role as local highways authorities.</p>

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5	N/A	Natural England	General	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.	Noted.
6	N/A	Natural England	General	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.	Noted.
7	N/A	Natural England	General	Strategic Environmental Assessment/Habitats Regulations Assessment	Noted. Natural England, and other relevant bodies, were consulted on the SEA Screening Statement. Based on the feedback received, OPDC prepared

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				A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.	a SEA Screening and Determination Statement that accompanied the Draft Industrial SPD. This concluded that a SEA is not required.
8	N/A	TfL Planning	MP1	We welcome the requirement for an Active Travel Zone Assessment and the link to TfL guidance	Noted.
9	3	TfL Planning	MP2	We recommend that where possible short stay cycle parking for visitors is accessible from the street. In part c it should be clearer that separate provision should be made. It may not be appropriate for short stay cycling parking to be accommodated in staff cycle parking areas because part b(i) requires long stay cycle parking for staff to have controlled access/entry arrangements.	Change proposed to Principle MP2 to ensure short stay visitor parking is as convenient and accessible as possible.

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10	3	TfL Planning	Chapter 4	It is unclear why the requirement for accessible cycle parking bays is separated out into Ambition MA2 which appears to carry less weight. This should be included as one of the principles in MP2.	Change proposed to include this provision within the Principle. This change would provide clear guidance on how development proposals can provide cycle parking facilities that cater for larger cycles, including adapted cycles for disabled people; helping to demonstrate compliance with London Plan policy T5 (B).
11	3	TfL Planning	Chapter 4	<p>We recommend that a minimum of 20 per cent of cycle parking takes the form of easily accessible Sheffield type stands. This is in addition to a minimum of 5 per cent of spaces suitable to accommodate larger and adapted cycles.</p> <p>Reference should also be made to provision for cargo bikes to support active freight travel which may be particularly relevant for some industrial uses such as logistics and distribution.</p>	Change proposed to Principle MP2 to refer to cargo bikes. The Ambition and supporting text has been amended to encourage applicants to provide a minimum percentage of cycle parking as tubular stands. This will offer more opportunities to provide easily accessible cycle parking and reflects the fact that other tubular cycle parking designs are available on the market and may be suitable in many locations.

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12	4	TfL Planning	MP3	For clarity the principle should restate the London Plan and OPDC Local Plan policy that the starting position for any industrial site should be car free development rather than confining this to supporting text. All operational parking (where provision is clearly justified) will need to include active electric vehicle charging points.	Change proposed to Principle MP3 to clarify that car parking has to be justified (to reflect that the starting position will be car free development) and to clarify reference to electric charging. Local Plan Policy T4c)i) requires infrastructure for electric vehicles in all new operational non-residential car parking spaces and is already signposted. London Plan Policy T6 has now been added as an additional reference.
13	5	TfL Planning	Chapter 4	The wording could be stronger in making clear that all facilities for servicing including loading, deliveries and pick up/drop off should be provided within the site and that servicing on street or in the public realm e.g. inset servicing will only be considered in exceptional circumstances. Part C should refer in the first line to HGV/LGV access, consistent with later wording.	Change proposed to Principle MP3 and supporting text to refer to LGVs and to clarify that all facilities for servicing should be onsite; with on-street loading bays only used where this is not possible.

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14	N/A	TfL Planning	Chapter 4	Although it may not be classified as an industrial use, dark kitchens are frequently located in industrial areas and so the SPD should take the opportunity to set out guidance and advice on how servicing, deliveries and parking for cargo bikes should be catered for in new and emerging commercial uses such as dark kitchens, food preparation and food delivery services. The aim of the guidance should be to minimise impacts on the street frontage including pavements, cycle routes, bus stops/stands and the wider public realm.	No change proposed. The London Plan and OPDC Local Plan sets out policies on servicing, cycle and operational parking. The SPD also provides guidance on how to design this into industrial proposals. The SPD guidance applies to all industrial uses so, if adopted, it would be considered when relevant proposals are being assessed. OPDC is also preparing a Public Realm and Green Infrastructure SPD that will look how the design of the public realm from a servicing perspective.
15	6	TfL Planning	MP4	We would recommend extending the requirement that industrial sites within 100 metres of the Grand Union Canal or a rail siding should consider rail or water transport to a wider radius, particularly for bulk transport of construction materials, on large industrial sites or where consolidation/sharing of loads may be a possibility.	Change proposed to clarify that all sites should consider use of water and rail but a feasibility study will need to be submitted for sites that are in closer proximity.

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16	N/A	Iceni Projects on behalf of GLP	General	GLP acknowledge that the Draft Industrial SPD will form part of the guidance that supports the OPDC Local Plan (2022). It is understood that this is the first stage of drafting the new SPD and is part of OPDC's engagement strategy to give stakeholders the opportunity to help shape the Guidance. It is important to note from the outset that GLP remain supportive and appreciative of this initial engagement on the draft SPD. This letter sets out GLP's representations in respect of the new guidance and provides an assessment as to the appropriateness of some of the principles and ambitions set out within the proposed SPD.	Noted.
17	10	Iceni Projects on behalf of GLP	General	In summary, GLP support many of the principles outlined in the draft SPD, and the overarching aim of achieving exemplar industrial development that creates the best environment for local businesses, employees and residents alike. However, GLP are concerned by the SPDs focus on 'moving away from past trends of single-use, low density sheds', as there is evidence that there is still notable demand for these typologies and an increasing	Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. The Local Plan policies were informed by evidence base. Based on this evidence, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes

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				<p>scarcity of industrial land both across London and more locally in Park Royal. As such, GLP are concerned that the SPD risks diluting the remaining industrial land and pushing developers and tenants requiring these types of units out of London. Furthermore, as noted later in this letter, the evidence base used to inform the SPD is considered out of date, and therefore does not accurately represent the demand for, or functional needs of large scale, single format industrial units.</p> <p>Further details pertaining to GLP's views on the SPD and information on where we are seeking amendments to, or further clarification on the guidance documents, is noted in section B below.</p>	<p>having regard to providing flexibility for different industrial activities. The SPD does not preclude the delivery of specific typologies but recognises that where feasible opportunities should be taken to move away from single use low-density sheds. In line with the Local Plan, applicants must set out all options explored for intensification in their Planning Statements. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met. However, the context summary now includes additional socio-economic information.</p>
18	N/A	Iceni Projects on behalf of GLP	General	<p>GLP is a leading global investment manager and business builder in logistics, data infrastructure, renewable energy and related technologies. The combined investing and operating expertise allow GLP to create value for our customers and investors. GLP operate across Brazil, China, Europe, India, Japan, the U.S. and Vietnam and have more than \$120 billion in</p>	Noted.

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				<p>assets under management in real estate and private equity. Their portfolio includes an industrial site at 12 Waxlow Road, which is within Strategic Industrial Land (SIL) in Park Royal. The site owned by GLP is outlined by the red line in Image 1 below. GLP are committed to a broad range of ESG commitments that elevate their business, protect the interest of shareholders and investors, support employees and customers and enhance local communities.</p> <p>GLP Europe (formerly Gazeley) has a 30+ year track record of developing and managing logistics real estate across the United Kingdom, one of Europe's biggest logistics markets. GLP's combined experience and expertise as investors and operators provides them with a distinct competitive advantage to build, acquire and scale high-quality businesses and create value for customers and investors.</p>	
19	N/A	Iceni Projects on behalf of GLP	General	As already stated, GLP are supportive of many of the principles outlined within the Draft Industrial SPD. However, GLP would	Noted.

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				like to make representations directly responding to a number of SPD Principles. This section provides representations that directly responds to the questions set out in relation to the relevant principles/ambitions within the Industrial SPD consultation survey. These questions are in bold, and italics, with our response following. GLP would also like to make representations to the SPD's evidence base, which follows on from the survey responses included below.	
20	N/A	Iceni Projects on behalf of GLP	LCP1	GLP supports Principle LCP1 (Locational Considerations), particularly whereby part a ii) outlines support for locating industrial uses that have highest onsite industrial employment densities in areas with the highest public transport accessibility in addition to prioritising locating uses that require high levels of vehicle servicing and heavy goods vehicles (HGV) access along Park Royal Road, Acton Lane, Abbey Road, Coronation Road, or in proximity to and with quick access to the strategic road network.	Noted. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. The SPD does not preclude the delivery of specific typologies but recognises that where feasible opportunities should be taken to move away from single use low-density sheds. In line with the Local Plan, applicants must set out all options

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				<p>GLP also support OPDCs priority objective for the SIL outlined in supporting paragraph 3.6, which is to provide land and premises that can accommodate a range of industrial uses. However, they highlight a general theme across the SPD whereby it does not fully consider all industrial uses, particularly larger, single occupancy typologies. The focus is predominantly on integrating different industrial uses, including space for start ups and small business, or data centres. However, as expanded upon below, and in more detail in Appendix, there is evidence to demonstrate that there is a notable demand for large scale, single occupancy industrial units with a number of functional needs that may not have been fully considered.</p>	<p>explored for intensification in their Planning Statements. OPDC will accept schemes that provide industrial intensification, except where robust evidence has been provided by the applicant demonstrating that it is not feasible and/or certain considerations cannot be met. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met.</p>
21	7	Iceni Projects on behalf of GLP	General	<p>GLP seek to deliver high quality and highly sustainable designs, providing positive contributions to surrounding streetscapes. As such, they support the intentions set out in Principle ICP1 (Respecting and enhancing local character). However, they note that the evidence base fails to consider the OPDC Intensification Study (2018),</p>	<p>Change proposed. Principle ICP1 is focussed on industrial character and heritage and the supporting studies that specifically relate to this. The OPDC Industrial Intensification Study does not provide recommendations relevant to these topics and therefore it is not referenced in ICP1 but it is signposted</p>

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				<p>which provides key input to optimising the functionality of proposals. They also highlight that the Park Royal Industrial Building Typology case study risks being too prescriptive and potentially encourages a 'one type fits all' design approach, instead of considering the functional needs of different industrial typologies. It also lacks flexibility in the consideration of different local contexts, as it does not acknowledge that the typology case study is not relevant to all areas of Park Royal. For example, the majority of the buildings along Waxlow Road are single unit, street facing box sheds with no buffer between the warehouse and the road, and with minimal active frontage. Therefore, whilst the Park Royal Industrial Building Typology case study provides useful design guidance, sites should continue to be considered on a case-by-case basis, taking on board with the existing local context.</p>	<p>within the Built Form section. OPDC considers that industrial intensification can be delivered in a way that contributes towards a positive industrial character and heritage to ensure that even as these industrial typologies emerge, they can be truly rooted in place and not a one size fits all approach regardless of their context. The Park Royal Typology has been derived from an understanding of the local context and its form can successfully address a number of issues i.e. active/positive frontage along streets, locating yards at the rear etc. However, additional supporting text now explains that the Park Royal typology should be tested as an option within Design and Access Statements and a clear explanation given if an alternative approach is proposed after testing.</p>
22	8	Iceni Projects on behalf of GLP	BFP3	<p>GLP supports the provision of guidance specific to industrial proposals with larger footprints and increased height outlined in Principle BFP3 (Designing large footprint</p>	<p>Change proposed. OPDC considers that there are opportunities, particularly on larger sites, to incorporate other SIL compliant uses, affordable, shared</p>

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				<p>and taller buildings). They specifically acknowledge the importance of breaking up height and massing and providing a positive contribution to the quality of the industrial area. However, they consider that points c) and e) fail to acknowledge the requirements of larger, single occupancy units, for which there is evidently significant demand. For example, whilst ancillary uses, such as office uses, are considered appropriate to support the needs of future occupiers, incorporation of other SIL compliant uses with higher employment densities is not always appropriate. This is particularly the case where industrial sites are under single occupancy with restricted access to protect the security of goods and equipment being secured.</p> <p>Furthermore, block size is largely dictated by industrial (market) requirements, and thus it is not always possible to implement reductions or breaks in the blocks. GLP do however seek to highlight their support for the encouragement of active travel through creating new accesses to connect up walking and cycling routes outlined in part</p>	<p>and/or small business units and increase permeability. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

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				e); GLP seek to prioritise pedestrian and cyclist movement wherever possible, and have experience in succeeding to do so without compromising required block sizes.	
23	N/A	Iceni Projects on behalf of GLP	BFP7	Furthermore, GLP support Principle BFP7 (Designing for flexibility and resilience), particularly whereby part a) encourages proposals to be designed to allow for flexibility in building design which can easily and quickly shift its capabilities. GLP agree that particularly where the end occupier of the proposals is unknown, maximum flexibility should be applied to the internal floorplans of Class B2/B8 units to adapt to market demand and evolving functionality needs. GLP would welcome the application of further flexibility more generally across the draft SPD principles in line with BFP7, as discussed throughout these representations.	Noted.
24	9	Iceni Projects on behalf of GLP	BFP8	With regards to Principle BFP8 (Integrating small and affordable industrial units), GLP recognise the importance of providing commercial floorspace that supports the diverse range of businesses that operate within the OPDC. However, GLP highlight	Change proposed. Amendments have been made to Principle BFP8 and its supporting text to clarify that proposals should comply with Local Plan policies and refer to OPDC's Planning Obligations SPD.

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				<p>the contradiction between draft Principle BPF8 and Obligation OB7D (Provision of affordable workspace) of the adopted Planning Obligations SPD (June 2023). For example, Principle BPF8 part a) states that all industrial proposals within and outside SIL should incorporate other industrial small units as part of the mix of units as well as affordable workspace, directly referring to the Planning Obligations SPD. However, Obligation OB7D part b) outlines that an in-lieu contribution may be more appropriate for certain schemes, which would be considered on a case-by-case basis.</p> <p>The nature of industrial, and in particular Class B8 Warehouse units proposed for single occupancy, do not ordinarily lend themselves to multiple occupancy and indeed the commercial success of these units largely depends on their independence. This requirement of BPF8 may therefore prohibit developers from delivering an intensification of industrial use within SIL, as is strongly encouraged by development plan policies, OPDC's Industrial Intensification Study and</p>	

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				reiterated within this SPD. On this basis, GLP support paragraph 6.74, which outlines that there should not be a prescriptive definition of affordable workspace and approach, but also highlight that this should go further to clarify that proportionate in-lieu payment may be more appropriate to ensure that the space best meets the needs of the target end user, as outlined in Obligation OB7D Part b) and Figure 2.12 of the Planning Obligations SPD.	
25	8	Iceni Projects on behalf of GLP	Chapter 7	GLP strongly support the overarching ambition to optimise greening and biodiversity net gain on industrial sites across OPDC, as outlined in Principle GIP1 and Ambition GIA1. GLP also acknowledge the importance of working closely with ecologists and landscape architects to embed this principle from the outset of a scheme. However, Ambition GIA1 (Optimising greening and biodiversity) sets a target for all industrial developments within and outside of SIL to achieve an urban greening factor (UGF) of 0.3 or more. Whilst this is laudable, GLP wish to highlight that this is not a policy requirement, and	Changed proposed. 0.3 target is included in as an Ambition, where OPDC is encouraging developers/applicants towards best practice. OPDC understands that it may be challenging on some sites to achieve this, but the Ambition provides OPDC with an opportunity to maximise urban greening where possible. Also working towards the 0.3 target would help proposals meet biodiversity net gain requirements. OPDC already includes 0.3 as a target score in planning conditions and works with applicants to test this through detailed

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				that it may not be possible to fulfil this target in reality. For example, the supporting paragraph 6.31 of the OPDC Local Plan outlines that the 0.3 score will not be applied to proposals within the Park Royal SIL, recognising the challenge of achieving this score where schemes have significant servicing requirements.	landscape/green infrastructure proposals. However, additional text has been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
26	8	Iceni Projects on behalf of GLP	GIA1	The London Plan adopted policy position is clear in excluding B2/B8 industrial uses from the 0.3 UGF target. As such, GLP welcome the acknowledgement in paragraph 7.1 that this is not a policy requirement, and the statement in GIA1 part a) that the 0.3 target should be achieved 'where possible given site coverage of buildings'. However, they would welcome additional text that acknowledges the limitations of different industrial uses and building typologies and encourage that the current policy approach of excluding B2/B8 uses be maintained, whilst encouraging such schemes to achieve optimisation of greening as far as reasonably possible. GLP will continue to optimise what is	Change proposed. Paragraph 7.8 of the SPD is clear that the policy position is that Use Class B2 and B8 are excluded. 0.3 target is included in as an Ambition, where OPDC is encouraging developers/applicants towards best practice. OPDC understands that it may be challenging on some sites to achieve this but the Ambition provides OPDC with an opportunity to maximise urban greening where possible. Also working towards the 0.3 target would help proposals meet biodiversity net gain requirements. OPDC already includes 0.3 as a target score in planning conditions and works with applicants to test this through detailed

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				<p>achievable in line with the recently adopted OPDC Local Plan. They also note that a score of 0.1 or below is regularly accepted on logistics schemes across London owing to higher plot densities and challenges associated with forms of greening such as green roofs¹ [Examples include Patrizia Abbey Road, Brent (LPA ref. 22/2310) achieving a UGF of 0.055; Paloma Capital, Tottenham achieving a UGF of 0.05 (LPA ref. HGY/2022/0664); and Bloom Brixton achieving a UGF of 0.1 (LPA ref. 21/04767/FUL)]</p>	<p>landscape/green infrastructure proposals. However, additional text has been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>
27	8	Iceni Projects on behalf of GLP	GIP2	<p>In line with the above, although GLP do indeed support OPDCs desire to encourage the provision of greening on roofs and boundaries where feasible as outlined in Principle GIP2 (Green roofs and boundaries), they reiterate the difficulty of providing these on warehouse intensification schemes in reality. Whilst incorporating greening on site boundaries is often more easily implementable, subject to site constraints, the provision of green roofs presents a number of challenges in practice. For example, where roof areas are</p>	<p>Change proposed. The SPD notes that roofs can be designed to accommodate both greening and solar. However, additional text has been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

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				allocated for PV panels to assist in achieving net zero carbon in operation in addition to BREEAM targets. Additional decking and height is also often required to support the provision of green roofs, which risks conflicting with design guidance pertaining to building heights and also embodied carbon. As such, GLP would welcome greater acknowledgement of such limitations, and the implication this may have on realistic UGF score.	
28	10	Iceni Projects on behalf of GLP	General	As set out in the introduction, GLP raise concern that the SPD does not accurately reflect the area's market needs and therefore misrepresents larger, single occupancy typologies. Whilst they acknowledge the need for a diverse range of industrial typologies across OPDC, the intention to move away from single-use, low-density sheds outlined in the SPD, directly contradicts the demand for these units. For instance, GLP have found that occupiers continue to require suitable facilities that enable future expansion, without having to relocate. Occupiers also want the ability to future-proof operations	Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. The Local Plan policies were informed by evidence base which clearly demonstrates the potential for intensification is strong in Old Oak and Park Royal. Based on this evidence, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial

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				through capital investment in facilities, such as automation and robotics.	activities. The SPD does not preclude the delivery of specific typologies but recognises that where feasible opportunities should be taken to move away from single use low-density sheds. In line with the Local Plan, applicants must set out all options explored for intensification in their Planning Statements. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met. However, the context summary now includes additional socio-economic information.
29	10	Iceni Projects on behalf of GLP	General	An OPDC Market Needs Analysis has been prepared by Iceni Projects to review the evidence base used to inform the SPD and to highlight key trends and demand side factors. Significantly, the Market Needs Analysis highlights that the OPDC Local Plan demand side data is limited and comprises evidence that was published in 2018 or before, and therefore was all developed prior to COVID-19. As a result, it arguably lacks a granular understanding of how commercial market requirements have	Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. The Local Plan policies were informed by evidence base. Based on this evidence, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for

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				since evolved. Furthermore, the report highlights that more up-to-date evidence for the host Boroughs is available, yet has not been used. As such, GLP seek clarification on why this data has not been used to inform the SPD.	different industrial activities. The SPD does not preclude the delivery of specific typologies but recognises that where feasible opportunities should be taken to move away from single use low-density sheds. In line with the Local Plan, applicants must set out all options explored for intensification in their Planning Statements. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with the evidence base. However, the context summary now includes additional socio-economic information.
30	10	Iceni Projects on behalf of GLP	General	The industrial deals analysis finds that, whilst a majority of deals and floorspace leased is within transaction for units of 500-2,000sm, a significant amount of the total market demand is attributed to 5,000+ sqm units; almost 20% of the floorspace transacted in OPDC in the past 5 years is in 5000sqm+ (including the largest 10,000sqm+). The analysis also highlights that a number of recent industrial deals and developments are characterised by typical eaves heights of 8-15m, yard depths of 30-	Change proposed. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. The SPD does not preclude the delivery of specific typologies. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with the

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				<p>50m, drive in doors/ loading bays and first floor mezzanine accommodation.</p> <p>Overall, the evidence shows there to be a clear demand for large scale, single format industrial units, with eaves heights of up to 15m and large yards. However, this demand is not well represented in the draft Industrial SPD due to the evidence base being outdated. As a result, the functional needs of these units is not duly considered in the formation of the guidance principles and ambitions, which may prejudice such development from coming forward.</p> <p>Fundamentally, without fully understanding the market dynamics across OPDC, there is a risk that the aspirations of the SPD lack relevance and gravity with regards to meeting the future needs of occupiers and the types of industrial units that need to be brought forward in the coming years. Please refer to the OPDC Market Needs Analysis in Appendix 1 of this letter for further information.</p>	<p>evidence base. However, the context summary now includes additional socio-economic information.</p>

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31	10	Iceni Projects on behalf of GLP	General	<p>GLP also wish to highlight the relevance of the findings outlined in the recent GLA Industrial Land Study (March 2023). Across London, there was a 5% (355ha) decline in the total amount of land in industrial use between 2015 and 2020. More significantly, Table 2.11 of the study shows that there has been a loss of 29.6ha of industrial land in Park Royal/A40/Heathrow property market area during this same period, Therefore, by prioritising other typologies and failing to acknowledge the significant demand for and needs of larger, single occupancy units at a time where industrial land is increasingly precious, the draft SPD risks diluting the amount of remaining SIL designated land even further.</p> <p>Similarly, the NLA's 'Industrial and Logistics – Can London Deliver?' report (February 2023) stresses the importance of Local Planning authorities understanding the supply and demand of industrial and logistic in their local areas, and that flexibility is key for local plans to facilitate the demands of industrial space as the type and quantity of logistics spaces are vary across boroughs.</p>	<p>Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of specific typologies. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with this evidence base. However, the context summary now includes additional socio-economic information.</p>

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				GLP encourage that this pro-active approach is undertaken by OPDC to support the drafting of future iterations of the SPD.	
32	N/A	Iceni Projects on behalf of GLP	General	Finally, GLP wish to emphasise that the industrial and logistics sector is making significant progress to meet and exceed design and sustainability requirements. Section 4 of the British Property Federation's (BPF) 'Levelling Up – The Logic of Logistics' report (2022) finds that single occupancy units can be built with recycled, low carbon and sustainably sourced materials and have the advantage of being lightweight, adaptable structures. This report also finds that industrial and logistics buildings are consistently achieving Net Zero Carbon as well as top EPC and BREEAM ratings. GLP's own Magnitude 314, Magna Park development in Milton Keynes is used as a best practice case study within the report, praised as being the world's first Net Zero carbon for construction in line with the UKGBC Net Zero Carbon Buildings Framework	Noted.

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				Definition. Therefore, it is clear that large-scale, single occupancy warehouse buildings can still be of high-quality design, incorporating innovative approaches to sustainability, and therefore should not be discounted.	
33	10	Iceni Projects on behalf of GLP	General	Therefore, GLP recommend that the evidence base be revisited to consider the GLA Industrial Land Study (2023) in addition to more up-to-date market needs analysis.	Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. The Local Plan policies were informed by evidence base which clearly demonstrates the potential for intensification is strong in Old Oak and Park Royal. Based on this evidence, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. The SPD does not preclude the delivery of specific typologies but recognises that where feasible opportunities should be taken to move away from single use low-density

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					sheds. In line with the Local Plan, applicants must set out all options explored for intensification in their Planning Statements. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met. However, the context summary now includes additional socio-economic information.
34	10	Iceni Projects on behalf of GLP	General	<p>Overall, GLP supports OPDC's aim to provide guidance to developers on industrial development.</p> <p>However, they raise concern with regards to the out-of-date nature of the evidence used, and the overall lack of market narrative around demand in the area and the functional needs of differing industrial typologies. GLP are particularly concerned by the lack of consideration of key recent evidence, notably the GLA Industrial Land Study (March 2023) which highlights the significant reductions in industrial floorspace across London and Park Royal in recent years.</p>	<p>Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. The Local Plan policies were informed by evidence base which clearly demonstrates the potential for intensification is strong in Old Oak and Park Royal. Based on this evidence, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. The SPD does not preclude the delivery of specific typologies but</p>

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
					<p>recognises that where feasible opportunities should be taken to move away from single use low-density sheds. In line with the Local Plan, applicants must set out all options explored for intensification in their Planning Statements. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met. However, the context summary now includes additional socio-economic information.</p>

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35	10	Iceni Projects on behalf of GLP	General	<p>It is considered that the SPD has not been prepared using the most recent evidence, and it seeks to dilute the nature and type of industrial land coming forward in the area. As a result, some of the policy guidance set out in the Draft Industrial SPD does not sufficiently consider the role of larger, single occupancy industrial units within Park Royal and could prejudice landowners and developers from investing in both existing and prospective property in the OPDC area. Therefore, GLP would welcome further clarification on why more up-to-date evidence for the host Boroughs has not been considered in the drafting of the SPD, and subsequently, that the evidence base be revised accordingly.</p>	<p>Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. The Local Plan policies were informed by evidence base which clearly demonstrates the potential for intensification is strong in Old Oak and Park Royal. Based on this evidence, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. The SPD does not preclude the delivery of specific typologies but recognises that where feasible opportunities should be taken to move away from single use low-density sheds. In line with the Local Plan, applicants must set out all options explored for intensification in their Planning Statements. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met.</p>

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
					However, the context summary now includes additional socio-economic information.

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36	8	Iceni Projects on behalf of GLP	General	Furthermore, GLP recommend that further flexibility be applied in line with Principle BPF7, namely to Principles BPF3, BPF8, GIP1, GIP2 and ambition GIA1, to ensure that developers and institutions are not prohibited from bringing forward schemes that would provide a significant intensification of industrial floorspace within SIL through the delivery of high-quality and highly sustainable schemes, as encouraged by local and regional planning policy.	Change proposed. Additional text has been included in the Introduction (section 1) to explain that it may be challenging to meet elements of the SPD guidance in certain circumstances, and these would be considered on a case by case basis.
37	N/A	Iceni Projects on behalf of GLP	General	<p>The SPD notes that it “will apply generally to the whole OPDC area, with a core focus on:</p> <ul style="list-style-type: none"> • how industrial developments, within and outside of SIL, can be intensified and integrated within the urban fabric and demonstrate best practice from a design, placemaking and sustainability perspective; • how industrial developments can respond to local character, by setting out spatially specific design guidance where appropriate; • development that happens on/within sites.” <p>The SPD considers issues across a range of matters, including industrial character;</p>	Noted.

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				heritage and sense of place; built form; Green infrastructure; mitigating impacts and environmental sustainability.	
38	10	Iceni Projects on behalf of GLP	General	An overarching concern is the degree to which the SPD has been prepared without a detailed understanding of the market dynamics in the study area – effectively what the business occupier needs are. Without this understanding there is a risk that the aspirations of the SPD lack relevance and gravity in terms of the future needs of occupiers and the type of spaces that need to be brought forward in the coming years.	Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. The Local Plan policies were informed by evidence base which clearly demonstrates the potential for intensification is strong in Old Oak and Park Royal. Based on this evidence, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. The SPD does not preclude the delivery of specific typologies but

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					recognises that where feasible opportunities should be taken to move away from single use low-density sheds. In line with the Local Plan, applicants must set out all options explored for intensification in their Planning Statements. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met. However, the context summary now includes additional socio-economic information.
39	10	Iceni Projects on behalf of GLP	General	<p>OPDC Local Plan demand side data is limited and where more up to date evidence for the host Boroughs is available it has not been referenced in the SPD. Generally, OPDC evidence is published from 2018 and developed before that, so pre dates COVID-19 and lacks a granular understanding of the evolution of commercial market requirements. A summary of the evidence and issues is presented here:</p> <ul style="list-style-type: none"> • Socio Economic Baseline Study 2018 – no commentary on trends or needs in commercial spaces. 	Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. The Local Plan policies were informed by evidence base which clearly demonstrates the potential for intensification is strong in Old Oak and Park Royal. Based on this evidence, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing

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				<ul style="list-style-type: none"> • Future Employment Growth Sectors Study 2018 – limited information on occupier spatial needs. Fails to translate jobs forecasts to floorspace change. Employment not commercial market facing or tested. • Park Royal Intensification Study 2018 – seeks to translate above Future Sectors Study into intensification opportunities. Built around typologies and case studies. Industrial Estates Study 2017 – case studies from elsewhere. • Industrial Land Review 2018 – demand is derived from the Industrial Land Demand and Release Benchmarks studies most recent version of this published in December 2011 – this is considered inadequate. Broad trends in needs considered only through qualitative narrative. • Park Royal Atlas 2018 – contextual The SPD also cross references to the Industrial Intensification and Co-Location Study (2018). More recent studies such as the West London Employment Land Review 2021/22 	<p>flexibility for different industrial activities. The SPD does not preclude the delivery of specific typologies but recognises that where feasible opportunities should be taken to move away from single use low-density sheds. In line with the Local Plan, applicants must set out all options explored for intensification in their Planning Statements. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met. However, the context summary now includes additional socio-economic information.</p>

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				<p>Update refer to current market trends such as:</p> <ul style="list-style-type: none"> • “E-commerce as a market driver; locational market drivers ie A4; warehouse occupiers primarily being High Street retail / third party logistics (3PLs) / food retail / other: manufacturing, food service, automotive, wholesale – with focus in London on 3PLs and food retail; Electric vehicles.” • “competition from data centres, film/TV production studios, dark kitchens and delivery businesses.” • A significant proportion of deals taking place in medium / large premises (over 2,000 sqm or 21,500 sqft) (See Table 4.8). 	

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40	N/A	Iceni Project on behalf of GLP	General	<p>The purpose of this note is to highlight some of the key trends and demand side factors to ensure that they are recognised in the SPD and expectations are realistic and not onerous on development and occupation of buildings. This is through a combination of deals-based analysis and developments.</p> <p>Overall, the emphasis is on the importance and need for large buildings with sufficient eaves height of up to 15m, clear span floorspace and deep yards of up to 50m that should not be compromised in specification to meet non critical objectives.</p>	<p>Noted. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of specific typologies. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base.</p>

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41	10	Iceni Projects on behalf of GLP	General	<p>The figure below shows industrial floorspace leased from 2017 to 2023 (year to date) by size band in the OPDC area. Over the past 5 years there has been activity across the range of size bands with:</p> <ul style="list-style-type: none"> • 10.4% of floorspace transactions in units of 100-500 sqm; • 39.7% of floorspace transactions within the 500-2,000 sqm band; • 31.5% in the 2,000-5,000 sqm band; and • 13.6% in deals of 10,000 sqm. <p>This emphasises the importance of recognising a range of sizes but perhaps more importantly the very active role the medium, large and very large units play in market needs.</p>	<p>Change proposed. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of specific typologies or unit sizes. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base. However, the context summary now includes additional socio-economic information.</p>
42	10	Iceni Projects on behalf of GLP	General	<p>The figure below shows the floorspace transactions in Ealing and Brent by size band. A similar trend is seen to OPDC in that there is activity across the range of the band sizes.</p> <p>The 5,000-10,000 sqm size bands reports 11.2% of floorspace leased over the past 6 years and 14.8% in units over 10,000 sqm.</p>	<p>Change proposed. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of</p>

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				Mid sized units of 2,000 to 5,000 sqm make up 29.3% of transacted space.	specific typologies or unit sizes. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base. However, the context summary now includes additional socio-economic information.
43	10	Iceni Projects on behalf of GLP	General	<p>The table below summarises the industrial deals in OPDC and Ealing and Brent over the last 5 years. The make-up of the industrial transactions by size band in OPDC are similar to those seen across the wider area in Ealing and Brent.</p> <p>Whilst a majority of deals and floorspace leased is within transactions for floorspace of 500-2,000 sqm, nearly 20% of floorspace transacted is in 5,000+ sqm units (including the largest 10,000 sqm+) in OPDC. Large units therefore make up a significant amount of the total market demand.</p>	<p>Change proposed. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of specific typologies or unit sizes.</p> <p>Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base. However, the context summary now includes additional socio-economic information.</p>

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44	N/A	Iceni Projects on behalf of GLP	General	<p>Selected recent industrial deals are highlighted in table 2.2 below. Key features include:</p> <ul style="list-style-type: none"> • Typical eaves heights of around 8m • Yard depths of over 30m • Drive in doors / loading bays <p>Recent development examples are set out in table 2.3. Key features include:</p> <ul style="list-style-type: none"> • Typical eaves heights of up to 15m • Yard depths of up to 50m • Drive in doors / docking loading bays • First floor / mezzanine accommodation 	<p>Noted. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of specific typologies or unit sizes. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base.</p>
45	10	Iceni Projects on behalf of GLP	General	<p>This evidence shows that there is clear demand for large scale, single format industrial units, with eaves heights of up to 15m and large yards. It is important to establish this because it identifies in part the nature of demand for industrial units in the OPDC area. But these unit types are not necessarily well represented within the SPD document, as the evidence base which is used to inform the SPD is out of date.</p>	<p>Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. The Local Plan policies were informed by evidence base which clearly demonstrates the potential for intensification is strong in Old Oak and Park Royal. Based on this evidence, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments</p>

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					to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. The SPD does not preclude the delivery of specific typologies but recognises that where feasible opportunities should be taken to move away from single use low-density sheds. In line with the Local Plan, applicants must set out all options explored for intensification in their Planning Statements. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met. However, the context summary now includes additional socio-economic information.
46	N/A	Historic England	General	Thank you for the opportunity to comment on the draft Industrial Supplementary Planning Document (SPD) for the OPDC Area. As the Government's statutory adviser on the historic environment, Historic England is keen to ensure that its conservation and enhancement is fully taken into account at all stages and levels of the planning process.	Noted.

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				We have reviewed the document in light of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.	
47	N/A	Historic England	General	We note the general emphasis in the document on both the historic environment (including designated and non-designated heritage assets) and on development proposals using an understanding of local context to inform their design, form and massing. This is very much to be welcomed and as a result our comments are limited in nature.	Noted.
48	11	Historic England	Figure 1.3	We would suggest that in order to better understand the current situation with regard to the historic environment and local character, it would be helpful if conservation areas, areas of local character and proposed conservation areas were clearly marked on Figure 1.3.	Change proposed. A map showing designated and undesignated heritage assets has now been included.

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49	12	Historic England	LCP1	The focus within the SPD on contextual development proposals could be further strengthened by the inclusion of some related text within Principle LCP1 Locational Considerations. A further sub-clause within section a indicating that proposals should demonstrate how their impacts on local character and townscape have been considered and avoided would be helpful.	Change proposed. An amendment has been made to correct a typo and ensure LCP1 cross references to section 5 (Industrial Character, Heritage and Sense of Place) where more detail is given on how proposals should consider relevant local character and townscape matters.
50	13	Historic England	ICP1	We very much welcome the text at paras 5.11 – 5.13, as this is the key section where the strong emphasis on understanding existing context to inform the overall design of new proposals is set out. We strongly support this section, although we would suggest that the relevant Conservation Area Appraisals and/or Management Plans (and the equivalent for Areas of Local Character) were referenced within clause a of Principle ICP1.	Change proposed. Additional text has been added to refer to relevant Conservation Area Appraisals and/or Management Plans.
51	N/A	Historic England	6.13-6.18	Similarly, we welcome paras 6.13-6.18 which includes further detail on responding to local context. However, we note that there is no reference to building heights in this section of the	No change proposed. OPDC's Local Plan policies SP9, D3 and D5 support proposals that respond appropriately to the setting of sensitive locations, including designated and undesignated heritage assets; positively to the

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				SPD, nor indeed within the text for Principle BFP3 other than in its title. While we would acknowledge that the type of industrial buildings envisaged in the area are unlikely to be considered 'tall' in borough-wide or London terms, the largely low rise nature of the neighbourhood means that in relative terms taller may well have adverse impacts on character. We would suggest that a further clause is included in BFP3 to clarify that taller development proposals take account of neighbouring building heights.	character of the existing context and / or positively contribute to the delivery of new positive character; make a positive contribution to the existing and future townscape; and protect amenity. The Local Plan also supports industrial intensification, which could include multistorey industrial developments that are taller than existing/neighbouring industrial developments. OPDC consider that there are already appropriate and sufficient provisions in the Local Plan and Industrial SPD to guide taller industrial buildings.
52	N/A	Historic England	General	I trust these comments are useful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
53	N/A	Ministry of Defence	General	<p>I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to Old Oak and Park Royal Development Corporation (OPDC) Draft Industrial Supplementary Planning Document consultation.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other parts of the MOD.</p>	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
54	N/A	Ministry of Defence	General	<p>Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end, MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.</p> <p>Copies of these relevant plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.</p>	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
55	14	Ministry of Defence	General	The authority area of the OPDC is washed over by safeguarding zones associated with RAF Northolt, specifically aerodrome height and birdstrike safeguarding zones. The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.	Change proposed. The SPD does not and cannot create new policies; it only provides detailed guidance on the adopted policies. Amendments have been made to refer to the safeguarding zones associated with RAF Northolt as part of the Context summary (section 2).

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
56	N/A	Ministry of Defence	General	<p>To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of each of the safeguarding zone types is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.</p> <ul style="list-style-type: none"> • The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Zones are drawn that trigger consultation on development of various heights to ensure that their effect on the protected airspace above and surrounding an aerodrome is assessed and, if necessary, mitigated. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the use of cranes, piling 	<p>Noted. OPDC's adopted Local Plan policies already support the delivery of new and enhanced green infrastructure and open spaces, including green roofs, urban greening and sustainable drainage (SuDS). The SPD does not and can not create new policies; it only provides more detailed guidance on how to proposals could comply with existing policies and it also encourages best practice where possible. The SPD specifically focuses on optimising urban greening as part of industrial developments, and ways to design space efficient SuDS into schemes. As this is aligned to OPDC's Local Plan, the guidance is not considered to create additional risks. Notwithstanding this, as noted in the response, the MOD is a consultee for relevant planning applications.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>rigs or other tall plant or equipment to implement development may also be of concern.</p> <ul style="list-style-type: none"> • Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes. Aircraft within these zones are most likely to be approaching or departing aerodromes and therefore being at critical stages of flight. Within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, such as green and/or Bio-solar/brown roofs/roof gardens on flat roof buildings, as well as the creation of new waterbodies such as ponds and/or attenuation basins, wetlands. Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. 	

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>The incorporation of open water, both permanent and temporary, provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation and therefore may be subject to design requirements or for management plans to be applied. It should be noted that development that results in the creation of an environment attractive to those large and/or flocking bird species hazardous to aviation should be avoided.</p>	
57	N/A	Ministry of Defence		<p>In addition to the scale of completed development, consideration should be given to the potential for the construction process and any plant or machinery required to implement development to project into the airspace above and surrounding RAF Northolt, the operation of technical assets deployed at that aerodrome, and the potential for an environment attractive to hazardous bird species to be formed temporarily.</p>	<p>Noted. OPDC's adopted Local Plan policies already support the delivery of new and enhanced green infrastructure and open spaces, including green roofs, urban greening and sustainable drainage (SuDS). The SPD does not and can not create new policies; it only provides more detailed guidance on how to proposals could comply with existing policies and it also encourages best practice where possible. The SPD specifically focuses on optimising urban greening as part of industrial</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
					<p>developments, and ways to design space efficient SuDS into schemes. As this is aligned to OPDC's Local Plan, the guidance is not considered to create additional risks beyond what is in the Local Plan. Notwithstanding this, as noted in your response, the MOD is a consultee for relevant planning applications. Therefore, the MOD can consider any site specific risks related to the construction process and proposed buildings when they are consulted on planning applications.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
58	N/A	Ministry of Defence		<p>Where development falls outside designated safeguarding zones, the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability by virtue of scale, height, or physical properties. Examples of these types of development include any development that would exceed a height of 50m above ground level. Tall (of or exceeding a height of 50m above ground level) structures introduce physical obstacles to low flying aircraft. The MOD should be consulted, through DIO Safeguarding, where development exceeds a height of 50m above ground level to ensure that the potential for these structures to form a physical obstacle to low flying aircraft can be addressed through appropriate lighting and charting. In addition, the MOD requests to be consulted on any proposals, regardless of height, which fall outside of an MOD safeguarding zone but are in the vicinity of military training estate or property.</p>	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
59	N/A	Ministry of Defence	General	<p>In summary, the MOD should be consulted on any potential development within the Aerodrome Height and Birdstrike safeguarding zones surrounding RAF Northolt, which consists of structures or buildings exceeding statutory safeguarding height zones, or any development which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation.</p> <p>I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.</p>	Noted.
60	N/A	Iceni Projects on behalf of Imperial	General	<p>Imperial acknowledge that the Draft Industrial SPD will form part of the guidance that supports the OPDC Local Plan (2022). It is understood that this is the first stage of drafting the new SPD and is part of OPDC's engagement strategy to give stakeholders the opportunity to help shape the Guidance. It is important to note from the outset that Imperial remain supportive and appreciative of this initial engagement on the draft SPD. This letter sets out Imperial's</p>	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				representations in regard to the new guidance and provides an assessment as to the appropriateness of some elements of it.	
61	N/A	Iceni Projects on behalf of Imperial	General	In summary, our client supports many of the principles and aims outlined in the draft SPD, particularly with regard to the integration of small and affordable workspace. However, the contradiction between need for intensification and how OPDC want this to be delivered may have the potential to discourage landowners and developers from investing in OPDC, and providing high-quality and sustainable industrial developments.	Noted. OPDC's Local Plan policies support industrial intensification. Applicants must set out all options explored for intensification in their Planning Statements. The SPD sets out guidance on a range of issues, but it does not preclude the delivery of specific typologies.
62	8, 10	Iceni Projects on behalf of Imperial	General	Furthermore, as noted later in this letter, the evidence base used to inform the SPD is considered out of date and does not consider the role of life sciences and related industries and their functional needs.	Change proposed. OPDC does not consider its evidence to be out of date and in any case, SPDs can only supplement existing policies in OPDC's Local Plan, whose evidence was

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>Further details pertaining to Imperial's views on the SPD and information on where we are seeking amendments to, or further clarification on the guidance documents, is noted in section B below.</p>	<p>scrutinised and found to be sound. OPDC's Future Employment Growth Sectors Study identified Med Tech (life science) as a growth sector. Based on an extensive evidence base, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of specific typologies. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base. However, the context summary now includes additional socio-economic information and additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
63	N/A	Iceni Projects on behalf of Imperial	General	<p>Imperial is regularly ranked amongst the top ten best universities in the world and is the only university in the UK to focus exclusively on science, engineering, medicine and business.</p> <p>Significantly, Imperial own the site at 1 Portal Way in North Acton, which sits within the College's Endowment, established in August 2005 to generate income to support its academic mission. This mission is to achieve enduring excellence in research and education in science engineering, medicine, and business for the benefit of society. The College offers world leading STEM education to over 20,000 students, has the greatest concentration of high impact research of any major UK university. Imperial was recently ranked first for research quality and graduate prospects in the UK by The Times and The Sunday Times Good University Guides and was ranked within the top ten universities in the world.</p> <p>Imperial is a committed, long-term local stakeholder in the area, with ownership of a number of properties in North Acton and</p>	<p>Noted. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of specific typologies. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>West London as a whole. The North Acton student village, located just a short walk away from the North Acton station, is home to two of Imperial's newest halls of residence, the Kemp Porter and Woodward Buildings, which opened in 2020 and 2016 respectively. Together, they are home to approximately 1,200 first year undergraduates, and have given rise to a thriving student community in the local area. Imperial own and manage Clayworks residential apartments in North Acton, which includes key worker accommodation. Imperial is also a proud sponsor of the recently established Park Royal Design District which made its debut at the 2021 London Design Festival.</p> <p>Imperial are excited and supportive of Old Oak and Park Royal as the single largest development opportunity in London. Together with the OPDC, Imperial are developing a 'West Tech' vision that draws from activities across multiple boroughs from Westminster to Hounslow and Brent (with Ealing and Hammersmith & Fulham at the centre) that builds a strong and</p>	

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>meaningful cluster of research; start-ups, scale ups and corporates. Through the White City Innovation District, Imperial are the early adopters of this vision, whilst also playing an active role in bringing forward sustainable development in and around North Acton.</p> <p>The White City Innovation District has created an eco-system for Science and Innovation with many occupiers now seeking additional space to expand their operations. However, there is a risk that existing tenants will leave the district if they cannot find suitable industrial or manufacturing space within proximity of their current facilities Imperial have already seen one of their current occupiers lease a warehouse in Park Royal to facilitate the manufacturing stage of their business, but industrial property is typically in short supply with few units returning to the market. Imperial's Investment Property Office, on behalf of the Endowment, is therefore exploring the opportunity to capture this demand whilst diversifying its portfolio through a new Industrial Strategy.</p>	

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>Imperial are owners, developers, and operators of affordable workspace including the Incubator at White City, providing office and laboratory space for early-stage companies. Imperial's experience to date has been shared with OPDC through previous consultations and has supported our comments in this representation. This letter sets out Imperial's thoughts in respect of a number of the draft principles and aims published within this SPD, as well as identifying matters which are not addressed at this stage for consideration in subsequent draft documents.</p>	
64	N/A	Iceni Projects on behalf of Imperial	General	<p>As already stated, Imperial are supportive of many of the principles outlined within the Draft Industrial SPD. However, Imperial would like to make representations directly responding to a number of SPD Principles. This section provides representations that directly responds to the questions set out in relation to the relevant principles/ambitions within the Industrial SPD consultation survey. These questions are in bold, and italics, with our response following. Imperial would also like to make representations</p>	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				relating to the evidence base informing the SPD and future consideration of life sciences and their contribution to industry in OPDC, which follows on from the survey responses included below.	
65	N/A	Iceni Projects on behalf of Imperial		Imperial College London support OPDC's prioritisation of active travel, consolidation of vehicle trips and encouragement of more sustainable, zero emission fleets expressed throughout the Movement principles and ambitions. However, Imperial are of the view that there needs to be a strategic overview on how connections are improved across Park Royal rather than looking at the requirement for industrial buildings in isolation. Particularly as transport has acted as a key catalyst for the regeneration of the OPDC area, becoming one of the most connected places in the UK once Old Oak Common Station opens, there needs to be greater acknowledgement of the importance of improving transport infrastructure and	No change proposed. OPDC's Local Plan sets the vision and policy framework for future development for the next 20 years, up to 2038. Figure 3.10 in the Local Plan shows proposed connections, including routes that connect the industrial area to North Acton and the wider OPDC area. OPDC's Infrastructure Delivery Plan provides more detail on the phasing of new/enhanced routes. The Place, Design and Transport policies of the Local Plan also support improved wayfinding, lighting, active/positive frontages and inclusive access as measures that would enhance the quality of streets and encourage

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>networks across OPDC. Imperial also believe that there should be greater weight given to permeability from North Acton to industrial areas in Park Royal, through improvements to street lighting and wayfinding to improve accessibility for occupiers. Furthermore, with a significant amount of development and thus construction activity coming forward across the area, there is a significant need for sustainable construction traffic and transport solutions and coordination across the development area.</p> <p>At present, the principles and ambition predominantly focus on access and parking facilities, in addition to increasing the use of freight transport via rail or water. Therefore, Imperial would welcome the introduction of a further principle focussing on connectivity and movement between industrial developments and Park Royal SIL and the wider OPDC area in line with Local Plan Policy SP7.</p>	<p>walking and cycling. OPDC is also preparing a Public Realm and Green Infrastructure SPD to set out more detailed guidance for streets, including those with an industrial setting. Local Plan policy T8 already lists measures that should help reduce construction related transport movements.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
66	7	Iceni Projects on behalf of Imperial		<p>Imperial have a track record of designing high quality, sustainable schemes and have worked closely with OPDC to ensure they would enhance the local character. Imperial therefore support the intentions set out in Principle ICP1 (Respecting and enhancing local character) and overarching aim to increase and encourage intensification and innovative growth. They also acknowledge the importance of new development being grounded in 'place' and reflecting the diversity of uses, buildings and cultures across OPDC, as outlined in supporting paragraph 5.2. However, Imperial raise concern that the Park Royal Industrial Building Typology case study may reinforce a 'one type fits all' approach, which would directly contradict this diversity, and does not suitably acknowledge the different design and functional needs of differing industrial typologies. Imperial therefore recommend that greater contextual flexibility is applied.</p>	<p>Change proposed. Additional supporting text has been added explaining that the Park Royal typology should be tested as an option within Design and Access Statements and a clear explanation given if an alternative approach is proposed after testing.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
67	N/A	Iceni Projects on behalf of Imperial		Imperial also encourage greater flexibility regarding the preservation of heritage versus viability. Particularly as the significance of character and heritage varies across OPDC and the landscape of industrial typologies is changing along with market demand and subsequent functional needs, it is also important to highlight that preserving heritage may be at odds with the environmental and sustainability principles and OPDC Industrial Intensification Study (2018). For example, where existing buildings are no longer fit for purpose, or where more modern design seeking to achieve net zero targets is not in keeping with the character of the area. Therefore, proposals should be considered on a case-by-case basis, whereby the planning balance of preserving heritage is weighed up against the viability of delivering much needed industrial intensification.	No change proposed. OPDC's Local Plan Policy D7 already explains how OPDC will assess applications that affect designated or non-designated heritage assets, including proposals that would harm the significance of assets. The SPD does not create new policies. With regards to industrial character and heritage, the SPD lists spatially specific and other information that applicants should use and think about when developing designs to support local industrial character and heritage.
68	N/A	Iceni Projects on behalf of Imperial	ICP1	Significantly, the OPDC Industrial Intensification Study (2018) is not listed in Principle ICP1 as being part of the evidence base influencing design, which provides key input to optimising proposals. Therefore,	No change proposed. Principle ICP1 is focussed on industrial character and heritage and the supporting studies that specifically relate to this. The OPDC Industrial Intensification Study does not

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				Imperial recommend that this be integrated into Principle ICP1 to ensure that local character is shaped by relevant need and type of intensification.	provide recommendations relevant to these topics and therefore it is not referenced here. However, this Study is signposted within the Built Form section. OPDC considers that industrial intensification can be delivered in a way that contributes towards a positive industrial character and heritage to ensure that even as these industrial typologies emerge they can be truly rooted in place and not a one size fits all approach regardless of their context.
69	7	Iceni Projects on behalf of Imperial	BFP4	Imperial are acutely aware of the increasing scarcity of industrial land in London compounded by the increasing demand for that which remains. As such, they are strongly supportive of Principle BFP4 (Intensification – Efficient site layout and plot ratios) and increasing plot density and efficiency. However, they raise concern that the intention to intensify industrial uses on vacant and underutilised land within OPDC is inconsistent with the how OPDC want this intensification to come forward in the SPD. For example, whilst Principle BPF4 (Intensification – Efficient site layout and	Change proposed. The Park Royal typology does not preclude the delivery of industrial intensification. In line with the Local Plan, applicants must set out all options explored for intensification in their Planning Statements. Additional supporting text has been added to the SPD to explain that the Park Royal typology should also be tested as an option within Design and Access Statements and a clear explanation given if an alternative approach is proposed after testing.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				plot ratios) and supporting text makes reference to the different forms of intensification within the Industrial Intensification Study (2018) and how the feasibility of each approach is dependent on the context of each individual development site, the SPD is prescriptive in how new developments should be designed. For example, the Park Royal Typology is reinforced throughout as a key design consideration, including as part of Built Form Principle BPF2 (Scale, massing and rooflines of new industrial buildings).	
70	N/A	Iceni Projects on behalf of Imperial	BFP8	With regards to Principle BFP8 (Integrating small and affordable industrial units), Imperial recognise the importance of providing commercial floorspace that supports the diverse range of businesses that operate within the OPDC. Imperial also acknowledge that this is also required in line with OPDC Local Plan Policy E3 ('Supporting Small Businesses and Start Ups'), which requires proposals generating new employment floorspace to incorporate an appropriate quantum of affordable workspace offered below market rent.	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>Imperial continue to work closely with OPDC to explore how these workspaces can be delivered across their forthcoming mixed-use proposals, and they support the delivery across future industrial schemes. It is also important to reiterate that Imperial have a strong reputation for supporting start-ups and a diverse range of businesses across West London, such as through their Scale Space development in White City, which is specifically created to help innovative companies accelerate growth. Such development in OPDC aligns with the overarching ambitions of the draft Industrial SPD.</p>	

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
71	9	Iceni Projects on behalf of Imperial	BFP8	<p>Whilst Imperial's preference is for on-site delivery of small and affordable units, they would also welcome the flexibility to include the option for in-lieu payment where appropriate, such as for owner occupied sites. They highlight that in-lieu contributions are considered acceptable, and in certain circumstances, more appropriate, as outlined by the recently adopted to the OPDC Planning Obligations SPD (POSPD). Therefore, omitting the possibility for in-lieu contributions would directly contradict with the adopted POSPD. Additionally, if delivered on-site, Imperial encourage the allowance of a lower proportion of floorspace, where it can be demonstrated that this would meet needs. Imperial would specifically welcome the inclusion of the needs of Research & Development space for STEMM (Science, Technology, Engineering, Mathematics and Medicine) businesses within this principle and throughout the SPD.</p>	<p>Change proposed. Amendments have been made to Principle BFP8 and its supporting text to clarify that proposals should comply with Local Plan policies and refer to OPDC's Planning Obligations SPD. OPDC's Local Plan already refers to future employment growth sectors, this includes the Med Tech (life sciences) sector. The Planning Obligations SPD sets out the definition of affordable workspace, and provision is expected to align with this.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
72	10	Iceni Projects on behalf of Imperial	General	<p>Imperial note that the majority of the evidence used as the basis for the SPD pre-dates 2019, and therefore query the relevance of the guidance prepared. Significantly, it means that there is limited consideration for industry needs and demand post-COVID 19. As such, Imperial recommend that the evidence base be revisited to consider more up-to-date research pertaining to market demand across the OPDC area and London more broadly. More specifically, the SPD does not consider the growing role of Science and Innovation across the area and associated industrial requirements, such as ceiling height to accommodate additional plant or the role of glazing in controlling solar gains, are not represented throughout the SPD. Not only does this risk prejudicing the expansion of such industries into OPDC, but also risks the Innovation District more broadly. For example, occupiers may start moving out of London / West London altogether if they cannot find appropriate sites to expand their operations within close proximity to their offices in White City.</p>	<p>Change proposed. OPDC does not consider its evidence to be out of date and in any case, SPDs can only supplement existing policies in OPDC's Local Plan, whose evidence was scrutinised and found to be sound. OPDC's Future Employment Growth Sectors Study identified Med Tech (life science) as a growth sector. Based on an extensive evidence base, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. The Industrial SPD refers to technical design standards but it does not preclude the delivery of a diverse range of typologies. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base. Applicants can demonstrate how any proposed buildings are well designed for their</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				Therefore, the SPD is not entirely accommodating of demands for a range of industrial uses and business sizes as intended, but instead prejudicing those excluded from coming forward.	intended purpose as part of their planning applications. However, the context summary now includes additional socio-economic information.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
73	N/A	Iceni Projects on behalf of Imperial	General	Furthermore, whilst Imperial would welcome greater amenity provision in the area, they believe that the cost and appropriateness of delivering active frontages and façade upgrades must be carefully considered to ensure that development is viable.	No change proposed. OPDC consider that industrial units can provide active and/or positive ground floor frontages and address functional requirements. The Park Royal typology case study serves to illustrate an example of how this could be achieved. Local Plan policy supports proposals that make a positive contribution to the existing and future townscape, including delivering high quality active façade design. The SPD guidance provides more detailed guidance on how to achieve this to help to inform design proposals. This does not restrict creativity and innovation. Applicants can explain how they have arrived at their design solution, including any site specific issues, and OPDC can consider this as part of planning applications.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
74	N/A	Iceni Projects on behalf of Imperial	General	Overall, without fully understanding or representing the future changes in the market dynamics across OPDC, there is potential for the principles and ambitions of the SPD to lack any weight with regards to meeting the future needs of local business and industrial typologies that are being brought forward.	No change proposed. OPDC does not consider its evidence to be out of date and in any case, SPDs can only supplement existing policies in OPDC's Local Plan, whose evidence was scrutinised and found to be sound. OPDC considers this evidence to still be robust and relevant. Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of specific typologies. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base. The weight accorded to the SPD will be proportionate to its SPD status.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
75	N/A	Iceni Projects on behalf of Imperial	General	Overall, Imperial support OPDC's aim to provide guidance to developers on industrial development in addition to a number of principles and ambitions within the SPD, particularly with regard to the integration of small and affordable workspace. However, they raise concern with regards to lack of acknowledgement of demand from life sciences and associated industries and relevant design and functional requirements, in addition to connectivity between industrial sites within Park Royal and the rest of OPDC.	Noted. OPDC's Future Employment Growth Sectors Study identified Med Tech (life science) as a growth sector. Based on an extensive evidence base, OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. The Industrial SPD refers to the technical design standards but it does not preclude the delivery of a diverse range of typologies. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base. Applicants can demonstrate how any proposed buildings are well designed for their intended purpose as part of their planning applications. The Local Plan already shows proposed connections, including routes that connect the industrial area to North Acton and the wider OPDC area. OPDC's

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
					<p>Infrastructure Delivery Plan provides more detail on the phasing of new/enhanced routes. The Place, Design and Transport policies also support improved wayfinding, lighting, active/positive frontages and inclusive access as measures that would enhance the quality of streets and encourage walking and cycling.</p>

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
76	10	Iceni Projects on behalf of Imperial	General	Furthermore, it is considered that the evidence base is outdated, which may further serve to limit the typologies represented in the SPD. As a result, the SPD risks seeking a typology of industrial development that is also out of date. In addition, it could prejudice the expansion of life sciences and the Innovation District into OPDC if occupiers cannot find suitable units and developers cannot bring these forwards.	Change proposed. OPDC does not consider its evidence to be out of date and in any case, SPDs can only supplement existing policies in OPDC's Local Plan, whose evidence was scrutinised and found to be sound. OPDC's Future Employment Growth Sectors Study identified Med Tech (life science) as a growth sector. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met. However, the context summary now includes additional socio-economic information
77	7, 9	Iceni Projects on behalf of Imperial	General;	Overall, Imperial are supportive of industrial intensification in OPDC, particularly in the face of increasing scarcity of industrial land across London. However, they note the contradiction between the desire for	Change proposed. Principle ICP1 and the Park Royal typology does not preclude the delivery of industrial intensification. In line with the Local Plan, applicants must set out all options

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				intensification, and the prescriptive nature of the guidance that may limit development for a range of uses to come forward. Therefore, Imperial would welcome greater flexibility be applied across the SPD, and to Principles ICP1 and BPF8, to ensure that developers and institutions are not prohibited from bringing forward high-quality, affordable and sustainable industrial development, as encouraged by local and regional planning policy.	explored for intensification in their Planning Statements. Additional supporting text has been added to the SPD to explain that the Park Royal typology should be tested as an option within Design and Access Statements and a clear explanation given if an alternative approach is proposed after testing. Amendments have been made to Principle BFP8 and its supporting text to clarify that proposals should comply with Local Plan policies and refer to OPDC's Planning Obligations SPD (POSPD). The POSPD provides more detailed guidance on how OPDC will negotiate and secure affordable workspace - either on or off site. The approach to affordable workspace in the Local Plan and the POSPD does allow for some flexibility and the Industrial SPD is aligned to this.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
78	N/A	Quod on behalf of Valor Real Estate Partners	General	<p>Valor is a pan European real estate investment and asset management partnership focused exclusively on the industrial and logistics sector.</p> <p>Overall, Valor is supportive of the intent of the OPDC to provide further detail on the industrial policies in OPDC's Local Plan and, in particular, the vision to inspire exemplar forms of industrial development, however it is considered there are a number of matters that require further clarity to ensure the OPDC can maximise its ability to protect, enhance and appropriately intensify the use of its industrial land.</p>	Noted.
79	N/A	Quod on behalf of Valor Real Estate Partners	General	<p>Valor welcomes the recognition (at paragraph 8.1 of the ISPD) that strategic industrial locations "are one of the few areas that can accommodate industrial activities, including those operating 24 hours a day and creating noise, which would normally lead to land use conflicts elsewhere". However, it should also be recognised that there are existing and proposed industrial sites alike which need to operate on a 24/7 basis, which currently fall outside of strategic industrial locations. This</p>	<p>No change proposed. The Local Plan and Industrial SPD do not specifically preclude industrial activities that operate at night or 24 hours a day. As set out in Principle LCP1, applicants need to show how impacts can be managed having regard to the particular location and the needs arising from the uses proposed, including issues such as servicing. This information would be needed to understand the impacts of development</p>

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				<p>is particularly important given the intention of the ISPD to support a 24-hour industrial economy.</p> <p>Further, it is recommended that one of the principles should include explicit reference to accommodating 24 hour use as part of an industrial development, as opposed to the current approach where both the ISPD and OPDC Local Plan only includes such a reference in its supporting text (to Policy E1), rather than strengthening the position via wording in a policy or principle.</p> <p>It would therefore be beneficial if the ISPD were to include, likely within LCP1, reference to 24-hour use being acceptable and supported as part of industrial developments, with suggested text provided below:</p> <p>“a) all industrial proposals within and outside of SIL should....</p> <p>ii) consider the following opportunities:</p> <ul style="list-style-type: none"> • securing the ability of existing and future occupiers to be able to operate on a 24 hour basis”. 	<p>on a case by case basis, including how these impacts would be managed and taking into account any operations that were taking place on a 24hr basis.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
80	15	Quod on behalf of Valor Real Estate Partners	BFP2	<p>Principle BFP2 considers the scale, massing and rooflines of new industrial buildings. Valor support the need to create interest with industrial development and ensure they complement their surroundings, however equal weight must also be placed on the need for buildings to be functional to meet the needs of occupiers.</p> <p>Whilst it is recognised that industrial developments should respond to the local character as much as practically possible, there will be instances where the rooflines cannot always do this as they need to be functional for industrial use. Industrial units require specific internal clear heights in order to operate efficiently and this will not always be compatible with the surrounding roofscapes. However, this should not preclude an industrial unit being permitted, subject to it demonstrating consideration having been given to the surrounding context.</p>	<p>Change proposed to refer to balancing design and functionality. OPDC's Local Plan policies SP9, D3 and D5 support proposals that respond appropriately to the setting of sensitive locations, including designated and undesignated heritage assets; positively to the character of the existing context and / or positively contribute to the delivery of new positive character; and make a positive contribution to the existing and future townscape. OPDC's Local Plan also supports the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. The design of rooflines should balance both objectives. Principle BFP7 would work in conjunction with Principle BFP2 and this references that proposals should meet technical design standards. As such, OPDC considers that the SPD guidance has a balanced approach to</p>

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					both issues. Applicants can demonstrate that the proposed design is appropriate in terms of context and is fit for purpose taking relevant and spatially specific information into account as part of their planning applications. OPDC can assess this on a case by case basis.
81	8	Quod on behalf of Valor Real Estate Partners	BFP2	Part b of the principle advocates that industrial proposals deliver active and/or positive frontages along streets. This part of the principle does not fit with the rest of the principle and would be better placed as part of BFP5. Regardless of the drafting, it is recommended that a caveat is included within this part of the principle, recognising that active frontages are not always appropriate. For example, industrial sites which store confidential or high value goods should not be stored behind glazed panels which impact on the security of the unit. Valor recommends that some flexibility is added to this principle to acknowledge the need to balance design with functionality,	Change proposed. In line with OPDC's Local Plan policies SP9, D3 and D5 proposals should respond appropriately to the setting of sensitive locations, including designated and undesignated heritage assets; positively to the character of the existing context and / or positively contribute to the delivery of new positive character; and make a positive contribution to the existing and future townscape. OPDC consider that industrial units can provide active or positive ground floor frontages and address functional requirements. The Park Royal typology case study serves to illustrate an example of how this

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				<p>with suggested wording provided in green below: “Industrial proposals within and outside of SIL should: a) Ensure the form and massing balances design with functionality, and, where appropriate: i) Positively responds to local character and heritage (see Principle ICP1), including the Park Royal typology, while enabling industrial intensification; ii) Avoids long spans/frontages that are overbearing, blank and monotonous and that lack variety, visual interest, or physical breaks. Where it is not possible to respond to the local character, the applicant must set out justification for this in the Design and Access Statement. c) ensure the design and articulation of rooflines: i) where possible, demonstrate an understanding of, and positively contribute to, local industrial character, heritage and sense of place in line with Principle ICP1”</p>	<p>could be achieved. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

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82	8	Quod on behalf of Valor Real Estate Partners	BFP5	<p>Principle BFP5 considers building lines, boundary treatments and frontages. The principle encourages more attractive street frontages, with industrial buildings playing a more active role. This is generally welcomed, but detail needs to be added which recognises that the need for industrial units to be functional will often limit the extent to which a frontage can be active. It is often beneficial for an industrial development to propose internal yard space in order to protect the surrounding local amenity. Where internal yard space is proposed, the rear of the buildings will therefore face onto the public highway. Office space will likely be included above the access doors, facing internally to the yard space. This not only serves to optimise the space the above the doors which will not be suitable for racking but also offers natural surveillance over the yard space. This would then mean that there is no active frontage facing onto the highway.</p>	<p>Change proposed. OPDC considers that industrial units can provide active or positive ground floor frontages and address functional requirements. The Park Royal typology case study serves to illustrate an example of how this could be achieved. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>
83	8, 16	Quod on behalf of Valor	BFP5	<p>Similarly, the layout of a site may mean that building lines cannot be set to the edge of the Site and Valor welcome that reasons for</p>	<p>Change proposed. OPDC considers that in most cases the design and internal layout a building can be flexed</p>

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		Real Estate Partners		deviation from this approach are highlighted. However further to the above, Valor recommends that the criteria which allows deviation from this only on the grounds of active frontage being provided is removed (part Ai bullet 2). This should be assessed on a site-by-site basis, once the context of the site and its layout is understood.	appropriately to balance the need for active/positive frontages and functional requirements. However, Principle BF5 has been amended to clarify that active and/or positive frontages can be associated with positive forecourts. Additional text has also been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
84	8	Quod on behalf of Valor Real Estate Partners	BFP5	Valor would therefore recommend that a caveat is added which acknowledges that the configuration of an industrial site may mean that active frontages and building lines hinder the ability to fully utilise a site, and that optimisation should take priority, with suggested wording provided below: “Industrial proposals within SIL should: i) Set building lines to the edge of the site, facing onto the street unless • This has a negative impact on the street; and/or	Change proposed. OPDC considers that in most cases the design and internal layout a building can be flexed appropriately to balance the need for active/positive frontages and functional requirements. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.

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				<ul style="list-style-type: none"> • A positive forecourt is being maintained or provided linked to an active frontage in an acceptable location; and/or • In doing so, the functionality of the building or site would be compromised.” <p>“Ground floor industrial frontages within and outside of SIL should:</p> <p>c) When taking into account internal layout, maximise the extent (length) of positive or active industrial frontages, locating and articulating these based on OPDC’s Street Family, and improve the industrial canalside in line with Principle BFP1”.</p> <p>Other means of providing an interesting street scene should be supported.</p>	
85	N/A	Quod on behalf of Valor Real Estate Partners	BFP5	The approach of making the most efficient use of land is in line with paragraph 124 of the National Planning Policy Framework (July 2021).	Noted.
86	9	Quod on behalf of Valor Real	BFP8	Principle BFP8 relates to integrating small and affordable industrial workspaces. Valor fully recognise the challenges that exist for small businesses when it comes to securing	Change proposed. Amendments have been made to Principle BFP8 and its supporting text to clarify that proposals should comply with Local Plan policies

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		Estate Partners		<p>workspace that is affordable and of appropriate scale.</p> <p>It is important that the quantum of affordable workspace a development should deliver is always subject to a viability assessment, and that consideration is given to the appropriateness of some uses being able to accommodate affordable workspace due to layouts and likely neighbouring occupiers.</p> <p>Furthermore, it is also important for any potential future principle not to specify a specific stage as to when the affordable workspace should be delivered, for example, specifying that the affordable workspace should be operational first. This specified approach would not be justified as it could compromise the viability of some schemes, particularly larger schemes that may be developed in phases.</p> <p>It is therefore recommended that the wording “where appropriate” is inserted into the policy as not all industrial developments are able to accommodate “other small industrial units”. Alternative mechanisms for securing smaller and affordable workspace</p>	<p>and refer to OPDC's Planning Obligations SPD (POSPD). The POSPD provides more detailed guidance on how OPDC will negotiate and secure affordable workspace - either on or off site.</p>

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				should instead be cited, suggested wording provided below: a) Unless it can be evidenced as being unviable, all industrial proposals within and outside of SIL should incorporate other industrial small units as part of the mix of units as well as affordable industrial workspace in line with OPDC Local Plan policies”.	
87	24	Quod on behalf of Valor Real Estate Partners	GIP4	<p>Principle GIP4 currently requires that an adequate amount of space is set aside for new tree planting to achieve a 10% increase in tree canopy cover as part of industrial development within or outside of strategic industrial locations.</p> <p>Valor cannot support this principle as drafted but would recommend that a 10% increase is instead considered as a target rather than a requirement, recognising that in the majority of circumstances, industrial development and trees do not complement each other, due to the requirement to be able to offer safe access and movement for large vehicles and pedestrians. Suggested wording is provided below (with red to highlight the suggested removal):</p>	<p>Change proposed. In line with London Plan policy G7, development proposals should generally include the planting of additional trees. The Mayor's London Environment Strategy has a target to increase tree cover by 10%. OPDC consider that an 10% increase in tree canopy is possible and can be accommodated alongside industrial development. Trees provide multiple benefits and there are many existing examples of sites that already have trees on site as well as new industrial development schemes incorporating new trees. New trees can be planted so that they do not disrupt operations i.e. root barriers, selecting appropriate tree species based on the site</p>

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				<p>“Industrial development within or outside of SIL should:</p> <p>a) As part of soft landscaping proposals, a target of 10% should be set for an increase in tree canopy cover ensure that an adequate amount of space is set aside for new tree planting to achieve a 10% increase in tree canopy cover”.</p>	<p>conditions/layout. Also an increase in trees would help proposals meet urban greening factor (UGF) and biodiversity net gain (BNG) targets. However, the text in the Principle has been amended to reflect the Londonwide target and the contribution this can make towards UGF and BNG.</p>
88	8	Pocket Living	BFP1	<p>Principle BFP1 – while we appreciate that the ideal situation for mixed used proposals delivering industrial floorspace outside of SIL would be to have separate access for deliveries and loading etc, this would greatly affect the ability to bring forward mix used sites delivering industrial floor space. Where mixed use developments are car free, we suggest that servicing for residential and industrial uses can be shared if managed appropriately. Furthermore, it seems disproportionate that separate car parks would need to be provided for residential and industrial use, esp. where parking for residential led schemes is nearly always only for blue badge holders (which from our experience are significantly underused).</p>	<p>Change proposed. The Principle supports separate access for loading, deliveries and parking for industrial units as part of mixed use schemes because there are a number of considerations that would need careful consideration if an alternative was proposed. For example, these considerations could include the scale of the residential and non-residential parts of the development, the intensity of delivery and servicing movements, the characteristics of the site and whether the area is shared with active travel modes. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of</p>

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					the SPD guidance in certain circumstances and these would be considered on a case by case basis.
89	8, 41	Pocket Living	GIA1	Ambition GIA1 - It is not clear what UGF is expected for mixed used proposals delivering industrial floorspace outside of SIL. Would it be correct to assume that these developments would be 'encouraged to achieve an UGF of 0.3 or more'. It would be almost impossible to achieve a UGF of 0.4 while also attempting to maximize industrial use.	Change proposed. The supporting text has been amended to explain that the London Plan recommends a target score of 0.4 for developments that are predominately residential and a target score of 0.3 for predominately commercial developments (excluding B2 and B8 uses). 0.3 target is included as an Ambition for uses where a target is not set out in the London Plan (i.e. for B2/B8 uses inside or outside SIL). The Ambition is encouraging developers/applicants towards best practice. OPDC already includes 0.3 as a target score in planning conditions and works with applicants to test this through detailed landscape/green infrastructure proposals. However,

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					additional text has been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
90	N/A	Local resident	General	<p>I am writing in support of a suitable SIL strategy for the Old Oak Park Royal.</p> <p>Alongside North Acton, the above areas have been subjected to relentless urban overdevelopment which has proved fruitless overall and a complete blot on the landscape.</p> <p>There are too many residential units in comparison to the amenities and job opportunities provided. I would like to see well-respected and ethical companies operating in the area with minimal impact on the traffic infrastructure and the environment, which are already under a lot of pressure, and maximum benefit to the local communities and beyond.</p>	Noted. OPDC's Local Plan was adopted last year and sets the vision and policy framework for future development for the next 20 years, up to 2038 - including new homes and jobs. The Local Plan plans for a mix of uses across the OPDC area including the protection of land for industrial uses, new/improved town centres as well as new homes and open spaces amongst other things.

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91	N/A	Local resident	General	<p>In particular, I would call for the establishment of trade shops such as cobblers, builders merchants, plumbing, carpentry, foundries, repair shops etc. some of which could offer training and advertise activities through tours and open days.</p> <p>Where necessary, to avoid additional pollution, factories could be covered by 'dome' like structures similar to the design in Greenwich.</p> <p>We can't continue to buy everything from abroad, especially China, despite what the globalisation enablers continue to tell us.</p>	<p>Noted. OPDC's Local Plan supports a mix of non residential uses and includes policies related to supporting local labour, businesses and training/skills opportunities. OPDC has also been developing projects, working alongside businesses, to raise awareness and encourage people into the industrial area including the Park Royal Design District. The Local Plan and Industrial SPD outline a number of measures to reduce and mitigate emissions. Outside of the planning system, there are also regulations and regulatory bodies (such as the Environment Agency) in place to help protect and improve the environment.</p>
92	N/A	Canal and River Trust	General	<p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure</p>	<p>Noted.</p>

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				<p>network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.</p> <p>Thank you for your consultation on the above document, which has relevance to the Trust because of the historic nature of the Grand Union Canal as an industrial transport corridor.</p>	
93	N/A	Canal and River Trust	General	<p>As you will be aware, within the OPDC area, the Trust owns and manages the Grand Union Canal and its towpath, and is a statutory consultee in the Development Management process. The area contains one of the few active wharves on our London network, at Powerday. The Trust operates other vehicle-accessible wharves in London at Southall (Adelaide Yard), Bromley by Bow (Bow Free Wharf) and Dace Road (Hackney Wick), but these are increasingly under threat from adjacent development, where residential uses in particular can hinder their usage.</p>	Noted.

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94	N/A	Canal and River Trust	General	<p>Waterways are recognised as significant green infrastructure, but they also function as blue infrastructure, serving as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of the city.</p> <p>Please find below the Trust's response to your draft Industrial Supplementary Planning Document, which appears to be a very detailed piece of work.</p>	Noted.
95	N/A	Canal and River Trust	General	<p>We are pleased to see that the Canal Placemaking Strategy is embedded in the SPD, and that canal considerations are well established and highlighted.</p>	Noted.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
96	17	Canal and River Trust	General	<p>We would be pleased to see more direct references to engagement with the Trust on proposals in the vicinity of the Grand Union Canal, where in addition to direct impacts overshadowing, drainage, structural impact on waterway infrastructure, and ecology there may be access implications for increased towpath usage and suitability of access points etc. We would request that direct reference be made to supporting towpath and access improvements outside of the development itself.</p> <p>New towpath accesses will also require agreement with the Trust, through licences with the Trust's Estates team.</p>	<p>Change proposed. The text has been amended to include references to engagement and formal agreements needed with the Canal and River Trust on relevant proposals. OPDC's Local Plan policies (SP7, P3, D5) already explain how potential impacts from development will be assessed and that proposals should contribute towards improvements to the towpath.</p>
97	N/A	Canal and River Trust	Chapter 4	<p>This chapter (and elsewhere in the document) should include reference to developments supporting the growth and improvement of the active travel network. The Trust considers there is an opportunity to support the towpath and access improvements needed between Old Oak Lane and Acton Lane and between Steele Road and the North Circular.</p>	<p>No change proposed as OPDC's Local Plan Policies SP7 and P3g) already support active travel and proposals that contribute to improvements to the southern towpath. The SPD does not repeat policies in the Local Plan and should be read in conjunction with it.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
98	18	Canal and River Trust	MP4	The Trust is pleased to see support for waterborne freight in this section, which can illustrate a site's historic link with the canal network, as well as taking traffic off the local road network. At some sites, this may require investment in the infrastructure (dredging or wharfage for example). The Trust would also require a navigational risk assessment to be completed by the developer/contractor as part of their proposal, included within the freight feasibility study. Consideration should be given to loading and unloading points, likely barge movements and any impact on water resources, and possible network closures for other works.	Change proposed to refer to the potential for this to require additional investment and the need to submit a risk assessment as part of freight feasibility studies.
99	17	Canal and River Trust	Para 5.8	We are pleased that Paragraph 5.8 recognises the Grand Union Canal: "Another defining heritage feature of the area is the Grand Union Canal, and its designation, in part, as a conservation area. Canalside industrial developments should conserve and enhance the canal's unique character in line with OPDC's Local Plan Policy P3; and consider opportunities to improve the industrial canalside that are	Change proposed to refer to the Canal & River Trust as a key stakeholder with regards to the Grand Union Canal.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>referenced in OPDC's Canal Placemaking Study.</p> <p>Developers bringing forward industrial proposals should engage with relevant local businesses, users, and the communities to put the unique qualities and functionalities of the Grand Union Canal at the heart of their design proposals."</p> <p>However, regarding the highlighted section above, we suggest that the Trust should also be a recommended consultee for developers. Developers bringing forward industrial proposals should engage with relevant local businesses, users, the communities and the Canal & River Trust (who own and manage the Grand Union Canal) to put the unique qualities and functionalities of the Grand Union Canal at the heart of their design proposals."</p>	
100	17, 19	Canal and River Trust	ICP2	<p>Page 29 - Principle ICP2 Amenities and supporting facilities for businesses and their employees</p> <p>With regard to this paragraph, we suggest the following amendment highlighted in yellow:</p> <p>"b)Outdoor staff amenity space should:</p>	<p>Change proposed. Additional text added to refer to the need for agreement/engagement with the Canal and River Trust and the provision of active travel routes.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>i) be incorporated as part of green infrastructure provision, prioritising locations adjoining public open spaces including the Grand Union Canal, and/or provide new access to the canalside where it would be safe to do so, and subject to formal agreement with the Trust (early engagement should be undertaken)". This policy principle should also highlight the provision of active travel routes, if not already well provided for (for employees and the community) which could be key to the wellbeing and retention of staff.</p>	
101	17	Canal and River Trust	Para 5.18	<p>5.18..."Development within SIL that adjoins the canal can use this locational advantage and locate complementary onsite outdoor amenity space and/or support access and improvement alongside the canalside for staff and visitors and subject to formal agreement with the Trust (early engagement should be undertaken)". We agree this canalside activation is useful, but it will also require careful management of spaces and proposals to allow sufficient space beside the canal. As above, we</p>	<p>Change proposed. Additional text added to refer to the need for agreement/engagement with the Canal and River Trust.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				would like the document to encourage early engagement with the Trust on this.	
102	N/A	Canal and River Trust	Chapter 6	<p>Page 35 - Canal and Public Open Spaces</p> <p>We are pleased to see reference here to improving biodiversity, activation, quality frontage, and improving access. We would also like to see encouragement for exploring the potential for new moorings. We suggest the following additional wording:</p> <p>"v) exploring the potential for new boat moorings alongside the site, with appropriate service connections".</p>	<p>No change proposed. OPDC's Local Plan Place Policy P3 already supports proposals that deliver a range of permanent and temporary moorings. The SPD does not repeat policies in the Local Plan but should be read in conjunction with it. The Place policies are already signposted in this section of the Industrial SPD.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
103	20	Canal and River Trust	BFP2	<p>This principle should include avoiding significant overshadowing of the canal and canalside environment, and consideration of the impacts of lighting on the waterway biodiversity. We would request the following additional wording, highlighted in yellow: Industrial proposals within and outside of SIL should:</p> <p>a) ensure the form and massing:</p> <p>i. positively responds to local character and heritage (see Principle ICP1), including the Park Royal typology, while enabling industrial intensification;</p> <p>ii. avoids long spans/frontages that are overbearing, blank and monotonous and that lack variety, visual interest, or physical breaks;</p> <p>iii. avoids significant overshadowing of the canal and canalside environment;</p> <p>iv. appropriately considers the impacts of lighting on biodiversity and the waterway environment."</p>	<p>Change proposed. OPDC's Local Plan Policy D5 (Amenity) expects proposals to maximise the quality and availability of daylight and direct sunlight to the public realm so issues of overshadowing would be assessed against this policy. Policy P3 (Grand Union Canal) also references amenity as a consideration when assessing proposals in relation to building heights (P3n). It requires proposals to deliver appropriate levels and types of lighting along the towpath (P3gii), and seeks to conserve and enhance the biodiversity value of the canal (P3k). Principle GIP3d) (Canalside Edges) of the SPD reinforces the need to avoid light spill. However, an additional reference to Local Plan policy D5 has been included as a signpost under Principle BPF2 of the SPD so that applicants are also directed to this policy.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
104	20	Canal and River Trust	Chapter 8	<p>This section could include consideration of:</p> <ul style="list-style-type: none"> • Heating and cooling opportunities, particularly using canal water. More information here: https://canalrivertrust.org.uk/enjoy-the-waterways/canal-and-river-wildlife/nine-ways-canals-can-fight-climate-change/heating-and-cooling-systems • Electric serviced moorings. Examples of existing projects here: https://canalrivertrust.org.uk/about-us/where-we-work/london-and-south-east/islington-eco-mooring-zone-trial 	<p>Change proposed. Additional supporting text and a signpost have been added to section 8 to refer to heating and cooling opportunities. The OPDC Local Plan Policy P3 supports the delivery of a range of different moorings and their supporting infrastructure, and Policy EU4 seeks to minimise air pollution. Principle/Ambition MIP1/MIA1 prioritises sources of energy that do not result in the emission of air pollutants. Therefore, any proposals that involve moorings would be assessed accordingly and the SPD does not need to duplicate this information.</p>
105	N/A	Canal and River Trust	MIP3	<p>Page 72 - Principle MIP3 Amenity for outside spaces</p> <p>Avoiding adverse wind microclimates and canyoning impacts are especially relevant to the canal, and we would like the principles to raise awareness of this. We suggest the following amendments: Industrial developments within or outside of SIL should:</p>	<p>No change proposed. OPDC's Local Plan Policy D5 (Amenity) expects proposals to minimise the effects of the urban heat island effect and excessive wind speeds generated by development by mitigating negative impacts on buildings and the public realm where identified. Proposals will be assessed against this and other relevant policies. The SPD does not</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>a) ensure external onsite amenity areas achieve acceptable wind microclimate conditions;</p> <p>b) not cause unacceptable wind microclimate conditions in amenity spaces located in adjoining sites (including the Grand Union Canal); and c) avoid locating heat or noise generating plant/equipment near to amenity spaces (including the Grand Union Canal) if possible."</p>	<p>repeat policies in the Local Plan and should be read in conjunction with it.</p>
106	17, 21	Canal and River Trust	MIP4	<p>Page 73 - Principle MIP4 Water and drainage</p> <p>During the consultation event, the issue of drainage and run off into watercourses was raised, particularly during fire rescue events. The Trust is also concerned that there should be no uncontrolled run off into the Grand Union Canal. The Trust can potentially accept clean surface water drainage into the Grand Union Canal, but this needs to be assessed by the Trust's Utilities and Environment teams and Third Party Works engineers, and subject to a formal licence. Drainage can't be accepted if it is not clean water, and may require appropriate pollution interceptors.</p>	<p>Change proposed. Additional text has been added to refer to the role SuDs have in managing water quality and the need for Canal and River Trust assessment and agreement if proposals involve water draining into the canal.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
107	22	Canal and River Trust	Chapter 10	Page 93 We are pleased to note the reference to the Canalside Volunteering project. There is a typo in the first bullet (Grant).	Change proposed to correct the typo.
108	N/A	Canal and River Trust		We hope that the comments provided are clear and helpful and that your next revision will address these points. We would be happy to continue to work with you, to discuss these points if helpful to work together towards high-quality development that relates positively with the waterway network.	Noted.
109	N/A	Lichfields on behalf of Prologis	General	Prologis is one of the largest developers of industrial logistics buildings within London and across the UK. The company has built, delivered, and managed over 50 million sqft of industrial floorspace across 22 'Prologis Parks' and continues to invest in strategic employment locations, creating high quality business environments for a range of occupiers. Prologis is a leading expert in the design, delivery and management of industrial space in the UK and across the world. Prologis currently owns three warehouse properties within OPDC which are located	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>within the industrial heartland of Park Royal. Prologis currently manage, and where appropriate, will redevelop these sites to deliver world-class warehousing and logistics facilities to meet the growing needs of its customers and industrial space within London. Whilst these sites are located within LB Brent, they are within the planning jurisdiction of OPDC for the purpose of determining new applications and therefore the guidance within the SPD will apply. Of particular relevance to Park Royal and London as a whole, Prologis is considering opportunities to help address the acute need for new distribution warehouse floorspace to serve London and is exploring how innovative development can make best use of the limited space available. These representations are therefore prepared in the context of optimising density on sites and facilitating urban intensification through the delivery of innovative buildings, including multi-storey. Prologis is committed to expanding its portfolio of distribution properties, contributing positively towards</p>	

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>the GLA and OPDC's ambitions for sustained employment growth. It is within this context that Prologis has reviewed the draft SPD and make the following comments, in light of its extensive experience in the delivery of the type of industrial buildings envisaged within the Local Plan and SPD. Prologis will be submitting a planning application for industrial development within Park Royal, and while the SPD will not form part of the development plan, it will be a material consideration in the determination of such planning applications. Prologis therefore seeks to help guide the SPD to reflect the realities of industrial schemes which will be brought forward in Park Royal, by highlighting areas of concern at this early stage of the document. Prologis would welcome the opportunity to work with OPDC in developing the SPD further, and would be happy to discuss the comments below in person.</p>	
110	N/A	Lichfields on behalf	General	Prologis supports the overall aims of the SPD in providing further detailed guidance on how OPDC will implement industrial	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
		of Prologis		related policies in the London Plan and Local Plan. This includes how industrial developments can be intensified, particularly in Strategic Industrial Locations ('SIL'). However, as currently drafted, Prologis considers that there are a number of points within the SPD which require greater clarification and/or flexibility to be made. These comments are set out below, structured by broad theme given there are a few instances where the draft principles and ambitions within the SPD interrelate with each other. Any specific suggested changes to the wording of the SPD are set out in red italic text.	
111	23	Lichfields on behalf of Prologis	General	<p>Ambitions</p> <p>One of our overarching observations on the draft SPD relates to the inclusion of 'Ambitions'. In its introduction, the draft SPD confirms that proposals will be required to comply with the 'Principles', however proposals will not be required to adopt the Ambitions which are instead designed to encourage developers to deliver best practice development. Paragraph 008 (Reference ID: 61-008-20190315) of the</p>	Change proposed. Text has been amended to explain how OPDC will consider the Ambitions.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>National Planning Practice Guidance (“NPPG”) on Plan-making states: “Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.” (our emphasis)</p> <p>Many of the Ambitions set out within the draft SPD have more demanding requirements which go beyond current planning policy. As the NPPG sets out, the role of the SPD should be to provide additional information and detail on how OPDC will implement industrial related policies in the Local Plan, and it should not therefore seek to introduce further requirements. It is noted that paragraph 1.8 of the draft SPD states that proposals will not be required to adopt the Ambitions, however Prologis is concerned that there is</p>	

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>a risk that any proposal that does not demonstrate that it has sought to meet these Ambitions will be viewed unfavourably. Prologis supports the objectives of the Ambitions but is concerned that this may lead to potential confusion in the implementation of the SPD. It is therefore requested that the inclusion is revisited and, if they remain, that the draft SPD makes clearer how such 'Ambitions' will be applied to the consideration of development proposals.</p>	
112	8	Lichfields on behalf of Prologis	General	<p>Categorisation of Industrial Development A further overarching comment on the draft SPD is the generic approach towards the categorisation of industrial development. Specifically, Prologis is concerned the draft SPD does not recognise that there are different types of industrial uses with varied operational requirements. As a result there are certain aspects of several Ambitions and Principles which would be operationally challenging for the use of buildings and subsequent leasing arrangements. Industrial development ranges across Use Classes E (formerly B1), B2 and B8 and</p>	<p>Change proposed. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of specific typologies. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base. However, additional text has been included in the</p>

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				<p>can include manufacturing (both heavy and light assembly) buildings, storage and distribution properties (including general warehouses) and multi-purpose 'flex' buildings which typically contain office space, research and development space and/or data centres. As such, proposals for industrial development will inevitably comprise of a different function and form that is appropriate to that particular use, and each will also need to be designed to fulfil the occupiers' specific needs. A distinction must therefore be made within the draft SPD to acknowledge this, and our suggested changes to certain principles below are made within this context to allow greater flexibility.</p>	<p>Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>
113	N/A	Lichfields on behalf of Prologis	General	<p>Operational Requirements As noted above, a broad range of industrial uses exist, and development proposals will each have their own varied operational and functional requirements, with buildings designed to suit a particular use and the needs of intended occupiers. In this context, it is noted that the supporting text on movement (paragraph 4.2) sets out</p>	<p>No change proposed. OPDC's Local Plan policy T7 supports proposals that maximise the use of more efficient and sustainable ways of delivering goods including by electric vehicles. Principle MIP1 reflects this by seeking to maximise the use of zero emission operational vehicles. Assumptions about transport movements and types</p>

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				<p>that OPDC will expect the planned increase in industrial floorspace to coincide with a shift towards greater sustainability, including a transition towards more sustainable, zero emission vehicle fleets. This is later reflected within Principle MIP1 (Air quality), which states that industrial developments should:</p> <p>b) maximise the use of zero emission operational fleet vehicles by applying the vehicle hierarchy in the following order of priority:</p> <ul style="list-style-type: none"> • zero-emission; • hybrids; • up-to-date Euro Standards for vehicle emissions or superseding alternatives applicable at the time of initial occupancy. <p>Prologis is supportive of the overall prioritisation of sustainable transport vehicles/movements and the role this plays in helping to improve air quality in and around the OPDC area. Indeed, Prologis is committed to market-changing sustainability innovation and intends to invest £1.5bn over the next three years to develop net zero carbon warehouses across London, the</p>	<p>of vehicles that would access the site will still underpin a transport assessment, even where the intended occupier is unknown, applicants can explain how the proposal has been designed in a way that would help the end user to maximise use of electric/zero emission vehicles.</p>

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				Southeast and the Midlands. However, the utilisation of 'cleaner vehicles' is to a large extent dependent on the occupier(s) of the proposed development and this requirement is also linked to the operation as much as the design of the building. To reflect this and ensure flexibility in the approach, it is requested that the following wording is included within Principle MIP1: "Industrial developments within or outside of SIL should, where practicable..."	
114	7	Lichfields on behalf of Prologis	ICP1	<p>Operational Requirements</p> <p>Similarly, Principle ICP1 (Respecting and enhancing local character) expects industrial developments to protect and enhance the industrial heritage and character of the OPDC area, including details of how this has informed scheme design.</p> <p>In certain cases and reflecting the constraints of land availability within SIL, the delivery of industrial intensification will require new and innovative approaches to design, including the development of multi-storey schemes. These bring with them different functional requirements to</p>	Change proposed. Principle ICP1 explains the spatially specific and other information that applicants should use and think about when developing their scheme design, to support local industrial character and heritage. OPDC considers that industrial intensification can be delivered in a way that contributes towards a positive local cultural, social and economic heritage and character such as thinking about the choice of materials, rooflines, relationship to the Canal, and/or art/signage etc. All industrial typologies can be designed in a way that means

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				<p>traditional industrial buildings and associated practicality issues, which may make it more challenging – by virtue of their specialist and highly technical design – to positively respond to the local character and heritage of the area. There is an inherent tension between this and delivering industrial intensification (as encouraged by OPDC Local Plan policy E1 and London Plan policy E7), and the most suitable built form to intensify the site will depend on a range of site specific and contextual factors and constraints.</p> <p>The importance of respecting and enhancing local character within the draft SPD is supported as a principle, however the wording is too tightly defined and does not allow for sufficient flexibility having regard to the technical design that is likely needed to intensify industrial uses, particularly multi-storey development. On this basis, it is therefore requested that the following additional wording is included within Principle ICP1: “In considering how the proposals meet the above requirements, the Council will also take into account the</p>	<p>they are truly rooted in place and not a one size fits all approach regardless of their context. However, additional supporting text explaining that the Park Royal typology should be tested as an option within Design and Access Statements and a clear explanation given if an alternative approach is proposed after testing.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				functional and operational requirements of building design to enable industrial intensification”.	
115	N/A	Lichfields on behalf of Prologis	MP1	Operational Requirements Separately, Section 4 (Movement) of the draft SPD – in particular Principle MP1 (Access) – focuses on how to support inclusive access for users who may have different needs, successfully accommodate the range of modes expected, minimise conflicts and increase overall sustainability of transport movements. Prologis is supportive of the overall aims and guidance contained within this principle. However, logistics facilities are often in operation at all times (24/7) and associated shift patterns frequently require female staff to finish work during the evening or at nighttime. It is noted that Principle ICA2 encourages industrial proposals to sign up to the Womens Night Safety Charter and adopt guidance on night workers’ wellbeing and amenity, yet Prologis considers that it is of critical importance that the operational	No change proposed as this is already adequately covered in the SPD. The SPD seeks to ensure equitable, diverse and inclusive outcomes, across all of the protected characteristics. Principle MP1d)i) supports the need for internal footpaths and/or access points for pedestrians and cyclists to be well lit and secure. In addition to this Principle MP3a)viii) expects the design, lighting and layout of car parking areas and routes to reflect security considerations. These considerations apply to ensure the safety for all users, taking into account all of the protected characteristics.

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				requirements of buildings are designed to protect the safety of female staff, including the ability to drive to work if necessary. This should therefore be given greater significance within Principle MP1, to ensure the safety of female staff is fully considered within industrial proposals. It is requested that the following additional wording is included within Principle MP1: "All industrial proposals within and outside of SIL should... g) ensure that access points, including vehicular, pedestrian and cyclist access points, and internal movement networks are located and designed to address women's safety, including through the use of good lighting and clear signage".	
116	8	Lichfields on behalf of Prologis	Chapter 6	<p>Activate Frontages</p> <p>There are numerous references and requirements throughout the draft SPD in relation to the provision of active or 'positive' frontages, as well as the use of physical breaks and façade treatment of buildings to avoid blank or overbearing frontages. The contribution of active frontages to positive placemaking and the delivery of healthy streets is acknowledged</p>	Change proposed. OPDC considers that it is possible for many different types of industrial uses to provide active or positive frontages. There are existing examples of industrial uses that include ancillary uses with active or positive frontages within the OPDC industrial area, including Use Class B8 uses with ancillary office and Use Class B2 uses with ancillary retail. OPDC's

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				<p>and supported. However, Prologis has significant concerns around the wording of this requirement in several principles and the potential implications for bringing forward large scale industrial developments within the area.</p> <p>Fundamentally, the delivery of active frontages is largely realised through the incorporation of active ancillary uses on the ground/lower floors. This is not always feasible or applicable for many industrial uses. For instance – reflecting our comments above regarding the need for the draft SPD to recognise the differences between types of industrial use and their form and function – the provision of ancillary uses to support and provide active frontages and amenities will be more appropriate for Class E (formerly B1) industrial uses such as office and research and development space, than for manufacturing and storage and distribution buildings (B2 and B8).</p>	<p>Local Plan policies already require proposals to maximise the use of positive and/or active frontages. The focus is not solely on active frontages, both the Local Plan and SPD also refer to positive frontages - an example of which could be including ancillary office uses on the ground floor street frontage. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

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117	8	Lichfields on behalf of Prologis	Chapter 6	<p>Activate Frontages</p> <p>This is particularly relevant within large-footprint and multi-level logistics buildings which are focused towards the logistics sector. These buildings will not by nature have active frontages. In addition, multi-storey buildings bring with them additional and specific challenges, as there are certain prime areas of these developments which must be reserved for warehousing and logistics workspace to make such schemes viable. For example, the ground floor of multi-storey buildings is the most likely to be used to logistics space with high level of vehicle movements and uses which do not lend themselves to active frontages. In addition, the upper floors of such buildings are not necessarily designed to accommodate high levels of vehicle loads meaning that the ground floor needs to be reserved for larger operators, and ancillary uses are likely to require much smaller amounts of space which could conflict with the floorplate typology and operations of the building. It is not therefore commercially appropriate or viable to require this for all</p>	<p>Change proposed. OPDC considers that it is possible for many different types of industrial uses to provide active or positive frontages. There are existing examples of industrial uses that include ancillary uses with active or positive frontages within the OPDC industrial area, including Use Class B8 uses with ancillary office and Use Class B2 uses with ancillary retail. OPDC understands that multistorey industrial is an emerging typology but note the precedent of an industrial intensification scheme that has managed to incorporate ground floor uses (Barking Industria). OPDC's Local Plan policy D1a)v) already requires proposals to maximise the use of positive and/or active frontages. The focus is not solely on active frontages, both the Local Plan and SPD also refer to positive frontages - an example of which could be including ancillary office uses on the ground floor street frontage. Supporting text to Principle BFP5 of the SPD explains that active frontages are more</p>

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				industrial development proposals. Further, site location will be an important consideration; even if ground/lower levels were suitable for ancillary uses, the demand for such uses is generally close to other facilities and in lively areas. A large scale B8 warehouse located at the centre of an industrial area will, usually, not generate or benefit from sufficient footfall to support certain ancillary uses and there may be circumstances whereby tenants do not want to occupy units which could result in vacancies.	likely to be prioritised along the highest order routes in OPDC's Street Family. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
118	8	Lichfields on behalf of Prologis	Chapter 6	<p>Activate Frontages</p> <p>The ability to provide active frontages through building design is also highly dependent on the type of use. Specifically, vertical or horizontal breaks in the built form may not always be possible due to the functional requirements of the building, and window openings at ground floor providing views through and into the building (also referred to as 'behind-the-scenes action' in the draft SPD) must be considered against practical internal arrangements of industrial uses which can present an 'untidy'</p>	Change proposed. OPDC considers that it is possible for many different types of industrial uses to provide active or positive frontages. There are existing examples of industrial uses that include ancillary uses with active or positive frontages within the OPDC industrial area, including Use Class B8 uses with ancillary office and Use Class B2 uses with ancillary retail. In most cases the design and internal layout a building can be flexed appropriately to balance the need for active/positive

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				appearance. The draft SPD notes that high-quality landscaping and other detailing that communicates the use of buildings (such as prominent building entrances) can also provide activation of and engagement with the public realm. This can be just as effective in providing a 'positive frontage' and is more appropriate and feasible for certain schemes including storage and distribution properties.	frontages and functional requirements. OPDC's Local Plan policies already require proposals to maximise the use of positive and/or active frontages. The focus is not solely on active frontages, both the Local Plan and SPD also refer to positive frontages - an example of which could be including ancillary office uses on the ground floor street frontage. However, additional text has been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
119	8	Lichfields on behalf of Prologis	MP1	<p>Activate Frontages</p> <p>In this context, the draft SPD should more clearly recognise that the ability to provide active frontages through ancillary uses or building design can be challenging for certain industrial schemes from a functional and operational perspective. A number of the draft principles should therefore be reflective of the realities of these requirements and be more flexible in</p>	Change proposed. OPDC consider that it is possible for many different types of industrial uses to provide active or positive frontages. There are existing examples of industrial uses that include ancillary uses with active or positive frontages within the OPDC industrial area, including Use Class B8 uses with ancillary office and Use Class B2 uses with ancillary retail. In most cases the

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>application. On this basis, it is requested that additional wording (underlined below) is included within the following principles:</p> <p>1 Principle Mp1 (Access): “All industrial proposals within and outside of SIL should: ...b) <u>where practical</u>, provide an active or positive frontage with dedicated, prominent, adequately lit building entrance with natural surveillance, that addresses personal safety, has legible signage and well located to serve pedestrians accessing the site directly from the street. <u>It is recognised that in certain large footprint, multi-level and logistics buildings, active frontages may be more challenging....”</u></p>	<p>design and internal layout a building can be flexed appropriately to balance the need for active/positive frontages and functional requirements. OPDC's Local Plan policies already require proposals to maximise the use of positive and/or active frontages. The focus is not solely on active frontages, both the Local Plan and SPD also refer to positive frontages - an example of which could be including ancillary office uses on the ground floor street frontage. However, additional text has been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>
120	8	Lichfields on behalf of Prologis	BFP1	<p>Activate Frontages [On this basis, it is requested that additional wording (underlined below) is included within the following principles:]</p> <p>2 Principle BFP1 (Adjacencies and agent of change principle):</p>	<p>Change proposed. OPDC consider that it is possible for many different types of industrial uses to provide active or positive frontages. There are existing examples of industrial uses that include ancillary uses with active or positive frontages within the OPDC industrial</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>“d) Industrial proposals within SIL or outside of SIL located along primary streets or railway corridors should deliver:</p> <p>i) <u>Where feasible and appropriate</u>, provide highly visible positive frontages and place branding that does not affect safety or amenity and is coordinated with other elements of the proposals, with particular emphasis on the creative integration of: colour; signage; lighting; public art...</p> <p>e) Industrial proposals within and outside of SIL along the canal or public open spaces should, <u>where feasible and appropriate</u>, provide positive frontages and actively complement them by...</p> <p><u>It is recognised that in certain large footprint, multi-level and logistics buildings, active frontages may be more challenging”</u></p>	<p>area, including Use Class B8 uses with ancillary office and Use Class B2 uses with ancillary retail. OPDC understands that multistorey industrial is an emerging typology but note the precedent of an industrial intensification scheme that has managed to incorporate ground floor uses (Barking Industria). OPDC's Local Plan policies already require proposals to maximise the use of positive and/or active frontages. The focus is not solely on active frontages, both the Local Plan and SPD also refer to positive frontages - an example of which could be including ancillary office uses on the ground floor street frontage. Supporting text to Principle BFP5 explains that active frontages are more likely to be prioritised along the highest order routes in OPDC's Street Family. However, additional text has been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
					certain circumstances and these would be considered on a case by case basis.
121	8, 20	Lichfields on behalf of Prologis	BFP2	<p>Activate Frontages [On this basis, it is requested that additional wording (underlined below) is included within the following principles:] 3 Principle BFP2 (Scale, massing and rooflines of new industrial buildings): “Industrial proposals within and outside of SIL should: a) ensure the form and massing: i positively responds to local character and heritage (see Principle ICP1), including the Park Royal typology, while enabling industrial intensification; ii <u>where practical</u>, avoid long spans/frontages that are overbearing, blank and monotonous and that lack variety, visual interest, or physical breaks, <u>including through the use of landscaping and elevation details</u>; b) <u>where practical</u>, deliver active and/or positive frontages along streets (see Principle BFP5)...”</p>	<p>Change proposed. Large spans/long frontages should be designed to deliver high quality development, given the specifics of the site and proposed uses, as part of their planning applications. OPDC also consider that it is possible for many different types of industrial uses to provide active or positive frontages. There are existing examples of industrial uses that include ancillary uses with active or positive frontages within the OPDC industrial area, including Use Class B8 uses with ancillary office and Use Class B2 uses with ancillary retail. OPDC's Local Plan policies already require proposals to maximise the use of positive and/or active frontages. The focus is not solely on active frontages, both the Local Plan and SPD also refer to positive frontages - an example of which could be including ancillary office uses on the ground floor street frontage. However,</p>

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					additional reference has been added to BFP3 and text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
122	N/A	Lichfields on behalf of Prologis	BFP3	<p>Activate Frontages [On this basis, it is requested that additional wording (underlined below) is included within the following principles:] 4 Principle BFP3 (Designing large footprint and taller buildings): “Industrial proposals within SIL proposing large footprint buildings with large span/long frontages should:...</p> <p>b) <u>where practical</u>, break up massing through vertical breaks in the building line or by incorporating distinctive, high quality elements into the design, such as greening, circulation cores, fenestration and vents and careful use of materials, colour and public art...”</p>	No change proposed. The Principle provides a range of ideas for how to break up the massing. This is not limited to a consideration of physical breaks in the building line. OPDC considers that this range means that there is flexibility built into the Principle. Applicants can explain how their design proposal delivers high quality development, given the specifics of the site and proposed uses, as part of their planning applications.
123	8	Litchfields on behalf	BFP5	Activate Frontages	Change proposed. OPDC consider that it is possible for many different types of industrial uses to provide active or

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
		of Prologis		<p>[On this basis, it is requested that additional wording (underlined below) is included within the following principles:]</p> <p>5 Principle BFP5 (Building lines, boundary treatments and frontages):</p> <p>“Frontages and signage</p> <p>b) Ground floor industrial frontages within and outside of SIL should, <u>where feasible and appropriate</u>:...</p> <p>c) <u>Where practical</u>, upper floors should still make a positive contribution to the public realm by acting as positive frontages.”</p>	<p>positive frontages. There are existing examples of industrial uses that include ancillary uses with active or positive frontages within the OPDC industrial area, including Use Class B8 uses with ancillary office and Use Class B2 uses with ancillary retail. OPDC's Local Plan policies already require proposals to maximise the use of positive and/or active frontages. The focus is not solely on active frontages, both the Local Plan and SPD also refer to positive frontages - an example of which could be including ancillary office uses on the ground floor street frontage. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

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124	8	Litchfields on behalf of Prologis	Chapter 7	<p>Green Infrastructure</p> <p>Prologis broadly support the principle of providing opportunities for industrial developments to include green infrastructure and the role this plays in increasing urban greening and achieving biodiversity gains. It is noted that the draft SPD acknowledges that doing so is more challenging for certain developments (as reflected by London Plan policy G5 which requires B2 or B8 uses to meet an Urban Greening Factor (UGF) of 0.3 as opposed to 0.4 for predominantly residential uses). Nevertheless, Prologis is concerned that the draft SPD seeks to introduce specific requirements that are potentially onerous to the delivery of industrial developments within the OPDC area, and that some of these may conflict with other strategic and local policy objectives with respect to energy performance and renewable, low carbon and zero emission targets.</p>	<p>Change proposed. The 0.3 target is included as an Ambition; where OPDC is encouraging developers/applicants towards best practice. OPDC understands that it may be challenging on some sites to achieve this but the Ambition provides OPDC with an opportunity to maximise urban greening where possible. Also working towards the 0.3 target would help proposals meet biodiversity net gain requirements. OPDC already includes 0.3 as a target score in planning conditions, and works with applicants to test this through detailed landscape/green infrastructure proposals. However, additional text has been included in the introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

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125	15	Lichfields on behalf of Prologis	GIP2	<p>Green Infrastructure</p> <p>Firstly, draft Principle GIP2 (Green roofs and boundaries) seeks to optimise the provision of green roofs on industrial buildings and avoid the location of plant facilities on roof space, given the nature of SIL land which is often space limited. However, this principle does not take into account the requirements to meet on-site renewable targets and does not allow for sufficient flexibility having regard to the highly technical design that is often needed to intensify industrial uses, in particular multi-storey schemes. Prologis is a leader in sustainable building design and has committed to achieving 100% carbon-neutral construction globally by 2025. To ensure that its buildings are as sustainable as possible and to maximise the provision of renewable energy, the provision of rooftop photovoltaic (PV) panels is regarded as the most efficient approach. Prologis has successfully implemented such systems on numerous industrial developments, and this has also proven beneficial to occupiers of the building. It is therefore requested that</p>	<p>Change proposed. OPDC Local Plan policy D3b) supports roof designs that minimise the provision of and visibility of plant and building services equipment; and are optimised in terms of their use for biodiversity, renewable energy generation and green open space. Aligned to this, Principle GIP2a)i) makes clear that solar technology is supported alongside green roofs. However, additional supporting text has been added to clarify that rooftops are an acceptable location for PV panels.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>the wording of Principle GIP2 is amended to provide greater flexibility and recognise that there will sometimes be a need to locate plant facilities and/or PV panels on rooftops, as follows:</p> <p>“All industrial developments within and outside of SIL should...</p> <p>b) where feasible, not locate mechanical plant facilities on roof space;</p> <p>c) <u>where included</u>, ensure that the structural implications of green roofs are considered at an early stage in the design process...”</p>	
126	15	Lithcfields on behalf of Prologis	BFP2	<p>Green Infrastructure</p> <p>In addition, it is noted that part c) vii) of Principle BFP2 (Scale, massing and rooflines of new industrial buildings) refers to the delivery of PVs as an ‘other objective’ in the design and articulation of rooflines. In line with our comments above, this should be given greater weighting as a priority for large-scale industrial development due to the physical suitability of such buildings, and it is therefore requested that the wording of Principle BFP2 is amended and added to as follows:</p>	<p>Change proposed. The text has been amended to remove phrase ‘other objectives’. Principle BFP2 does not attribute weightings, it lists a range of considerations that applicants should think about when designing their roofspaces/lines. Applicants can explain, through the planning application process, how they have arrived at their particular design solution for the roof which can include how they are balancing the need to meet energy, urban greening and biodiversity net gain targets,</p>

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
				<p>“Industrial proposals within and outside of SIL should... c) ensure the design and articulation of rooflines: vii) support other objectives by <u>appropriately</u> considering access to natural light, the delivery of photovoltaics, green roofs, rooftop amenity or parking (See Principles/Ambitions GIP2, GIA2, ICP2, MP3); ix) <u>appropriately consider the delivery of photovoltaic (PV) panels to maximise the provision of on-site renewable energy”.</u></p>	responding to local character and providing staff amenity.
127	N/A	Lichfields on behalf of Prologis	General	<p>Green Infrastructure It is noted that the above changes to Principle GIP2 and Principle BFP2 would also bring these principles in line with Principle MIP1 (Air quality) which states that industrial developments should ‘prioritise the use of sources of energy, heating and/or cooling that do not result in emissions of air pollutants’ – such as PV panels on rooftops. As it stands, there is potential conflict with Principle MIP1 and these principles which currently place greater importance on the provision of green roofs.</p>	No change proposed. The SPD does not attribute weightings with regards to use of the roofspace. The SPD notes that roofs can include both solar/PV and green roofs. Applicants can explain, through the planning application process, how they have arrived at their particular design solution for the roof which can include how they are balancing the need to meet energy, urban greening and biodiversity net gain targets, responding to local character and providing staff amenity.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
128	24	Lichfields on behalf of Prologis	GIP4	<p>Green Infrastructure</p> <p>Secondly, part a) of draft Principle GIP4 (Trees) currently sets out a requirement for industrial developments to ensure that an adequate amount of space is set aside for new tree planting to achieve a 10% increase in tree canopy cover. Prologis has significant concerns about the wording and achievability of this principle, it is not clear where this target is derived from, and it is not adequately justified within the supporting text. The London Plan (at paragraph 8.7.2) states that the Mayor wants to increase tree canopy cover in London by 10% by 2050, however this is not translated into policy (either in the adopted London Plan or OPDC Local Plan), reflecting the challenges associated with achieving such a requirement for all development proposals – not just industrial uses and SIL which are typically subject to greater land availability constraints. As drafted, this principle will have a significant impact on the viability and deliverability of schemes and runs the risk of preventing new industrial developments from coming</p>	<p>Change proposed. In line with London Plan policy G7, development proposals should generally include the planting of additional trees. The Mayor's London Environment Strategy has a target to increase tree cover by 10%. OPDC consider that an 10% increase in tree canopy is possible and can be accommodated alongside industrial development. Trees provide multiple benefits and there are many existing examples of sites that already have trees on site as well as new industrial development schemes incorporating new trees. New trees can be planted so that they do not disrupt operations i.e. root barriers, selecting appropriate tree species based on the site conditions/layout. Also an increase in trees would help proposals meet urban greening factor (UGF) and biodiversity net gain (BNG) targets. However, the text in the Principle has been amended to reflect the Londonwide target and the contribution this can make towards UGF and BNG.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				forward, which directly contradicts the NPPG. As such, it is requested that Principle GIP4 is amended as follows: "Industrial developments within or outside of SIL should: a) as part of soft landscaping proposals, ensure that an adequate amount of space is set aside for new tree planting to achieve a 10% increase in tree canopy cover where possible, explore opportunities for new tree planting, including large-species to support an increase in tree canopy cover".	
129	25	Lichfields on behalf of Prologis	BFP1	Agent of Change and Mitigation The draft SPD sets out that while it expects new industrial building typologies to emerge to cope with ongoing demand, the quality of the built form and the need to successfully mitigate any potential harm/conflicts should remain as a constant. It is recognised that these are important principles and that the requirement for new developments to manage and mitigate the impact of noise and other nuisances (such as dust, odour, light and vibrations) on neighbouring residents and businesses is set out within the London Plan (policy D13). The London	Change proposed. Table 6.1 has been amended to provide examples of buffers between industrial and residential uses. The supporting text to Principle BFP1 has also been amended to explain that appropriate mitigation should always be considered/delivered through the design and construction of a building and proposals should comply Agent of Change and design related policies.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>Plan further states that this is particularly important for development proposed for co-location with industrial uses and the intensification of industrial estates, and that when considering co-location and intensification of industrial areas, boroughs should ensure that existing businesses and uses do not have unreasonable restrictions placed on them because of the new development.</p> <p>In this strategic context, Prologis is broadly supportive of Principle BFP1 (Adjacencies and agent of change principle). However, part b) of this principle, which relates to the separation of industrial proposals within SIL from adjacent residential areas, requires further clarification. As it is currently drafted, the principle requires such proposals to consider the provision of buffers to separate the uses (industrial and residential) and also to locate servicing facilities and routes away from sensitive uses. However, the use and form of 'buffers' is not always necessary, and the location of servicing routes away from sensitive uses is unclear. The principle should also set out that where separation is</p>	

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>not possible, appropriate mitigation measures should be used instead. Indeed, this is recognised within the supporting text at paragraph 6.7 of the draft SPD, which more clearly suggests that in order to accommodate industrial proposals next to residential uses, industrial developments should minimise potential impacts from the outset through design mitigation from the outset (as opposed to mitigating any impacts retrospectively), such as covering industrial yard space to help with acoustic pollution. To provide greater flexibility, it is therefore requested that the specific wording of part b) of Principle BFP1 is amended to read: “b) Industrial proposals within SIL and adjacent to residential areas should be designed to mitigate the impacts of the conflicting uses considering the following:</p> <ul style="list-style-type: none"> i the provision of buffers on the SIL side or non SIL side or both to separate the uses; ii locating industrial servicing facilities and routes away from sensitive uses. i separating the uses where practical through distance, screening, landscaping 	

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>buffers, internal layout, sound-proofing, and other design measures;</p> <p>ii where it is not practical to separate the uses without undue impact on other sustainable development objectives, existing and potential impacts should be mitigated through design, including site layout, scale and building orientation.”</p>	
130	25	Lichfields on behalf of Prologis	Para 6.7	<p>Agent of Change and Mitigation</p> <p>Further, as set out above and reflected in London Plan policy D13, appropriate mitigation should be considered through design, and not lease arrangements. It is therefore requested that the following sentence is removed from paragraph 6.7 of the draft SPD, which is considered to be overly restrictive: “Applicants could also consider developing lease agreements that control noise, dust, light, odours and vibrations.”</p>	Change proposed to reflect the position that appropriate mitigation should always be considered/delivered through the design and construction of a building. Lease arrangements, in isolation, would not be a sufficient means to mitigate for all of the potential impacts arising from development.
131	26	Lichfields on behalf of Prologis	MIP2	<p>Agent of Change and Mitigation</p> <p>With respect to the mitigation of specific adverse impacts, Principle MIP2 (Noise and Vibration) sets out that industrial developments both within and outside of SIL should use appropriate measures to</p>	Change proposed. OPDC Local Plan Policy T7 supports proposals that provide measures to coordinate and reduce freight, servicing and delivery trips. Therefore, this is already expected to be demonstrated in

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>control noise, including ‘where noise and vibration impacts are likely to largely arise from transport, demonstrate mechanisms to reduce the number of vehicle trips’. By definition, the delivery of industrial intensification will increase the number of vehicle trips – particularly through new and innovative design approaches to intensify sites such as the development of multi-storey schemes – which will in turn likely generate noise and vibration impacts from transport. The draft SPD must recognise this and the requirement to ‘demonstrate mechanisms to reduce the number of vehicle trips’ is therefore considered to be unclear. If the intention is to provide further guidance on how increased levels of noise can be reduced or minimised as a result of increased traffic movements associated with industrial proposals, then this part of the principle requires greater clarification. On this basis, it is requested that the following wording within Principle MIP2 is either removed entirely, or amended, as follows: “Industrial developments within or outside of SIL should:</p>	<p>accordance with Policy T7 and the SPD text aligns with this. OPDC Local Plan Policy T9 also requires major trip-generating development to produce a transport assessment (TA) which assesses the potential transport impacts and put forward appropriate mitigation. The TA is required to demonstrate that the development can be accommodated within the capacity of the transport network. However, additional wording has been added to refer to the location of access/egress points as part of this consideration.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>a) Use Appropriate Measures (or Best Available techniques' (BAT) or 'Best Practicable Means' (BPM)) to prevent or minimise noise pollution from the development. Appropriate measures that should be used to control noise include but are not limited to:</p> <p>i where noise and vibration impacts are likely to largely arise from transport, demonstrate mechanisms to reduce the number of vehicle trips;</p> <p>i consider how the impact of any increased levels of noise and/or vibration associated with an increase in the number of vehicle trips can be minimised, including through the location of access/egress points and service yards to reduce vehicle movements in noise sensitive areas".</p>	
132	9	Lichfields on behalf of Prologis	BFP8	<p>Affordable Workspace</p> <p>It is noted that OPDC adopted the Planning Obligations SPD on 15th June 2023, shortly after the consultation for the draft Industrial SPD began. The Planning Obligations SPD confirms, at obligation OB7d (Provision of affordable workspace), that 5% of affordable industrial floorspace should be</p>	Change proposed. Amendments have been made to Principle BFP8 and its supporting text to clarify that proposals should comply with Local Plan policies and refer to OPDC's Planning Obligations SPD (POSPD). The POSPD provides more detailed guidance on how OPDC will negotiate

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>delivered on-site where this would generate at least 3,000sqm of affordable space. An addendum to the supporting affordable workspace study also sets out that the requirements may not be appropriate in viability terms for all developments, and this will therefore be calculated on a case-by-case basis in discussion within OPDC. In some cases, off-site contributions may be more appropriate than on-site delivery of small business units and/or affordable workspace.</p> <p>Principle BFP8 (Integrating small and affordable industrial workspaces) does not currently reflect this, instead specifying that all industrial proposals should include affordable workspace, as well as incorporate other industrial small units as part of the mix of units. While the principle also states that 'applicants should also refer to the Planning Obligations SPD', to reflect the now confirmed floorspace based requirements and to ensure flexibility in approach, it is requested that the wording of Principle BFP8 is amended to read as follows:</p>	<p>and secure affordable workspace - either on or off site.</p>

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
				<p>“a) All Industrial proposals within and outside of SIL should, <u>where appropriate</u>, incorporate other industrial small units as part of the mix of units as well as affordable industrial workspace in line with OPDC Local Plan Policies SP5, E1, E2 and E3 <u>and the requirements set out in the Planning Obligations SPD</u>;</p> <p>b) <u>Where affordable workspace is included in industrial development proposals, its provision should be designed and integrated by considering the following...</u>”</p>	
133	23	Lichfields on behalf of Prologis	ESA1	<p>Environmental Sustainability</p> <p>While highlighting again the overall status of the ‘ambitions’ in the draft SPD – which are not intended to be requirements but may lead to potential confusion in its implementation – it is noted that Ambition ESA1 (Minimising environmental impacts and contributing to OPDC’s Net Zero carbon target) encourages industrial developments within or outside of SIL to achieve BREEAM Outstanding. This is a more onerous target than the OPDC Local Plan, where Policy D3 (Well-Designed Buildings) already requires non-residential</p>	<p>Change proposed. Ambitions are encouraging best practice and are not required to be adopted. The SPD covers standalone industrial developments and those that might occur as part of mixed use developments. The BREEAM website cites examples where BREEAM Outstanding has been achieved. Introductory text has been amended to explain how OPDC will consider the Ambitions.</p>

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				<p>development to achieve BREEAM Excellent rating.</p> <p>As a developer, Prologis has committed to achieving 100% carbon-neutral construction globally by 2025 and was recently awarded the inaugural Terra Carta Seal at the COP26 summit by HRH The Prince of Wales, in recognition of its commitment to, and momentum towards, the creation of genuinely sustainable markets. Prologis was the only property company to receive this award. Notwithstanding Prologis' clear aspirations to achieve the very highest sustainable criteria, it has to be practical and feasible to do so and must be considered on a site-by-site basis; BREEAM Outstanding will not always be achievable. As we set out earlier, SPDs should build upon and provide more detailed guidance on policies in an adopted Local Plan (i.e. they cannot introduce new planning policies). Prologis is concerned that the inclusion of a BREEAM Outstanding target (even within an ambition) is therefore unhelpful and may result in misguided views on proposed</p>	

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				industrial developments that cannot commit to this rating. As such, it is requested that – if the draft ‘ambitions’ do remain – Ambition ESA1 in particular is removed from the SPD.	
134	8	Lichfields on behalf of Prologis	Chapter 6	<p>Other Design Considerations</p> <p>Beyond the broad themes set out above whereby a number of principles interrelate with another, it is also considered that the draft SPD contains some specific design requirements that may not be appropriate. Firstly, it is noted that part a) of Principle BFP5 (Building lines, boundary treatments and frontages) requires proposals to set building lines to the edge of the site facing onto the street, except where ‘this has a negative impact on the street’ and/or a ‘positive forecourt is being maintained or provided linked to an active frontage in an acceptable location’. The position of buildings in relation to the site boundary is a site-specific consideration and should be appropriate to the site context and characteristics and reflect its opportunities and constraints. For instance, building frontages should be designed in relation to</p>	Change proposed. OPDC consider that in most cases the design and internal layout a building can be flexed appropriately to balance the need for street lined building frontages and functional requirements. However, additional text has been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>the role and function of the streets that they are facing. Fundamentally, building to the edge of the site is also highly dependent on the type of industrial use as well as the nature of surrounding uses, and this may not always be possible or appropriate from a functional and viability perspective. This is particularly important at the moment, when the industrial and logistics sector is undergoing a significant period of change in terms of supply, demand, operator requirements and increased policy pressure to provide intensified industrial developments.</p> <p>This requirement also conflicts with other parts of the draft SPD and wider policy objectives. This includes the provision of outdoor amenity space and sufficient space for servicing and parking arrangements, as well as the adjacencies and agent of change principle (BFP1). As noted above, this principle seeks to separate neighbouring residential and industrial uses and this is typically achieved through landscaping buffers, distance, site layout and other design mitigation. Such measures</p>	

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				clearly conflict with the desire to set building lines to the edge of the site. Whilst it is recognised that utilising space to the edge of the site can help to develop sites as efficiently as possible, Principle BFP5 should therefore be more flexible in application and it is requested that additional wording is included as follows: “a) Industrial proposals within SIL should: <u>consider, where appropriate, setting building lines to the edge of the site, facing onto the street unless...</u> ”.	
135	N/A	Lichfields on behalf of Prologis	BFP6	<p>Other Design Considerations</p> <p>In addition, the draft SPD sets out a number of specific requirements with respect to façade design and the treatment of scale and massing within Principle BFP6 (Appearance and materiality). This includes the choice of material palette, organisation of utilities, and their relationship to artwork and fenestration layout.</p>	<p>No change proposed. OPDC consider that Principle BFP6 is appropriate as it provides more detailed guidance on existing Local Plan policies, particularly those related to making a positive contribution to the existing and future townscape, including delivering high quality active façade design. The Principle is drafted as a list of considerations that should help to inform design proposals. This does not restrict creativity and innovation. Applicants can explain how they have arrived at their design solution,</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
					including any site specific issues, and OPDC can consider this as part of planning applications.
136	20	Lichfields on behalf of Prologis	BFP7	Other Design Considerations Further, Principle BFP7 (Designing for Flexibility and Resilience) refers to the GLA Industrial Intensification and Co-location Study, and expects applications to meet the technical design standards within this document or any superseding Mayoral guidance as a minimum. However, the GLA study was published in 2018 and it is Prologis' view that this evidence may be dated, given more recent GLA ambitions relating to the value of industrial	Change proposed. OPDC does not consider its evidence to be out of date and in any case, SPDs can only supplement existing policies in OPDC's Local Plan, whose evidence was scrutinised and found to be sound. OPDC therefore considers its evidence to be robust and relevant. However a change has been made to clarify the reference to design guidance.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				intensification to the sector, particularly with complex multi-storey schemes and more innovative designs to deliver intensification opportunities. It is therefore requested that the references to this document within Principle BFP7 are removed.	
137	N/A	Lichfields on behalf of Prologis	General	Overall, Prologis is supportive of the aims of the draft SPD and recognise that it will provide helpful, more detailed guidance on how OPDC will implement industrial related policies in the Local Plan, including in relation to industrial intensification in SIL. The principles are broadly in accordance with the OPDC Local Plan and London Plan, and this is supported.	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
138	8	Lichfields on behalf of Prologis	General	<p>However, as set out above, it is considered that there are a number of areas where the draft SPD should be amended to better reflect the realities of the industrial schemes which are likely to be delivered in the OPDC area over the next few years. In particular, the SPD has adopted a prescriptive and tightly defined approach to a number of principles which we do not consider to be appropriate or sufficiently flexible, given Prologis' experience of delivering major industrial developments across London. The draft SPD also adopts a generic approach towards the categorisation of industrial development and does not recognise that different typologies of industrial uses will necessarily have varied operational requirements. Such an approach could threaten the viability and deliverability of these schemes, and industrial optimisation more generally.</p>	<p>Change proposed. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purpose having regard to providing flexibility for different industrial activities and the Industrial SPD does not preclude the delivery of specific typologies. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
139	N/A	Lichfields on behalf of Prologis	General	It is therefore requested that the overarching comments and specific amendments set out above are made to the final version of the document, to ensure that the strategic objectives of the OPDC can be fully realised. In order to progress and inform a final version of the SPD, and as the global market leader in logistics real estate, Prologis would be happy to meet with OPDC Officers to discuss the comments set out above, the challenges they present and possible solutions.	Noted.
140	N/A	GLA	General	We welcome this Industrial SPD supporting related local and strategic policy. The draft covers a range of aspects in great detail. The illustrations and images are engaging and add value.	Noted.
141	20	GLA	General	There is some overlap with our own work (specifically the emerging Designing Industrial Intensification and Co-location report and the wider Industrial London Plan Guidance), and in particular related to the sections about use, movement, and built form. The exact wording of the necessary references will depend on the content and status of the respective documents when	Change proposed to refer to GLA technical specifications and guidance, this could include the Designing Industrial Intensification and Co-location report and wider Industrial London Plan Guidance.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>ready for publication. Perhaps an overarching reference within the introduction will be useful.</p> <p>It is also important that all relevant London Plan Guidance is appropriately referenced. All current Guidance can be found here: London Plan Guidance London City Hall</p>	
142	N/A	GLA	Para 1.18	<p>As follows a few specific comments:</p> <ul style="list-style-type: none"> • Para 1.8 – the status of the proposed ‘ambitions’ is weak with little incentive or potential support /resources to facilitate achieving them. Does Council want to flag as a potential future requirements and provide some resources for take up of these as best practice? 	<p>No change proposed. Principles provided additional guidance related to existing policies. Ambitions go beyond this in terms of specific standards/targets and/or they are aligned to best practice development. OPDC has gone as far as possible within the remit for SPDs. Ambitions do not necessarily require additional resources to implement, however OPDC will work with applicants to understand what is and is not possible on a case by case basis.</p>

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
143	27	GLA	Para 3.6	Para 3.6 – supporting text to Principle LCP1 Locational Considerations – it should be clarified that increasing industrial employment densities should not outweigh the need to accommodate industrial uses that cannot be located elsewhere	Change proposed. The supporting text has been amended to clarify that increasing industrial employment densities does not outweigh the need to accommodate industrial uses that cannot be located elsewhere.
144	28	GLA	MP1	Principle MP1 – Access – the separation between pedestrian and vehicle access could feature more prominently, and our emerging draft indicative standards include advice on access for your consideration.	Change proposed. The text has been amended to clarify that separate access points should be provided for pedestrians/cyclists and vehicles and between industrial and residential uses on mixed uses schemes.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
145	40	GLA	ICP2	Principle ICP2 - the Good Growth by Design Publication on 'Safety in Public Space - Women, Girls and Gender Diverse People' could benefit from direct inclusion in this Principle.	Change proposed to clarify that staff amenity space should be inclusive and accessible take into account relevant design guidance. The Good Growth by Design Publication on 'Safety in Public Space - Women, Girls and Gender Diverse People' is signposted next to this Principle to highlight that this is a relevant publication.
146	20	GLA	Para 5.22	Para 5.22 – reference to GLA guidance can be removed.	Change proposed to delete reference to specific/named GLA guidance, as they might change over time.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
147	20	GLA	Para 6.4	Para 6.4 – reference to ‘design guidance’ should be clarified; it is likely to refer to our Designing Industrial Intensification and Co-location report, but recently published London Plan Guidance documents on design should also be considered – see under ‘Design’ on the London Plan Guidance website.	Change proposed to provide clarify the reference to design guidance.
148	20, 29	GLA	BFP2	Principle BFP2 – Adjacencies and Agent of Change Principle – clauses (g) and (h) should refer to London Plan Policy D13, not E7, and the emphasis on the mitigation still appears to be with the industrial unit/operation.	Change proposed. Principle BFP1 parts g) and h) have been amended to clarify proposals that adjoin SIL should not compromise continued industrial operations and that outside of SIL, mixed use proposals that include industrial floorspace should be designed so that the mix of uses within the development can function successfully. References to London Plan Policy D13 have been added.
149	29	GLA	BFP4	Principle BFP4 – Intensification – while all options for industrial intensification should be explored, this should not impact meeting supply for all required industrial functions, i.e. intensification should not drive out vital	Change proposed. The supporting text has been amended to clarify that SIL should meet a range of needs.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
				uses on industrial land such as logistics and waste management.	
150	20	GLA	Chapter 6.7.2	Para 6.7.2 – Repetition re reference to Designing Industrial Intensification and Co-location report, and also need to distinguish from other design guidance the GLA has prepared (see comment on para 6.4).	Change proposed to provide clarify the reference to design guidance.
151	20	GLA	Chapter 7	Green Infrastructure, mitigating impacts, and environmental sustainability sections – please ensure that all relevant London Plan Guidance is appropriately reflected and referenced.	Change proposed. References have been added to relevant sections of the document.
152	N/A	GLA	General	We will continue to collaborate looking at potential synergies and mutual reinforcement between our respective work on planning for industrial uses	Noted.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
153	20, 25	Local resident	Chapter 6	SPD planning documents – SIL and existing residential documents This SPD document should discuss how to provide a practical and effective buffer between industrial and existing residential areas (e.g. Between Stoke/Crewe Place and the Ursula Lapp Industrial Estate on Old Oak Lane or Stephenson Street and any future uses of the Euroterminal yard). Currently, the SPD does not discuss such measures. Why not - this is a glaring omission?	Change proposed. Table 6.1 refers to opportunities to manage industrial/residential adjacencies. This Table has been amended to provide examples of buffers between industrial and residential uses. The supporting text to Principle BFP1 has also been amended to explain that appropriate mitigation should always be considered/delivered through the design and construction of a building and proposals should comply with Agent of Change and design related policies.
154	N/A	Local resident	General	Canal Placemaking I note that the Canal Placemaking strategy to fulfil the vision is organised into strategic themes, in the Local Plan including Ecology & Heritage. But the OPDC itself is already undermining this worthy ambition at Old Oak Lane/Channel Gate – particularly the objective of building a continuous ecological corridor along the Grand Union Canal in Old Oak and Park Royal – for example, giving approval to a 35-storey building at Atlas Road and in the Local plan recommending	No change proposed. The SPD cannot and does not create new policies. OPDC's Local Plan policies plan for a range of building heights, including tall buildings in certain locations which are identified in the Local Plan. The heights of generally 6 to 8 storeys fronting directly onto the canal and opportunities for tall buildings at key crossing points within Channel Gate are subject to the impact on heritage, character, biodiversity and amenity of

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				building heights of 6-8 storeys fronting the canal in the knowledge that developers will want to build higher. The OPDC urgently needs to show local people it is serious about boosting local ecology and wildlife by restricting building heights all along the Grand Union Canal in Old Oak.	the canal. Within the industrial area the policy seeks to deliver heights that balance heritage, character, biodiversity and amenity of the canal and industrial intensification. The SPD provides detailed guidance on a number of matters including how to optimise urban greening which in turn should support higher levels of biodiversity. OPDC is also preparing a Public Realm and Green Infrastructure SPD and an Old Oak West SPD which will provide guidance related to this as well.
155	N/A	Local resident	General	I support the idea of adding facilities to support long-term moorings for the boater community. The Local Plan/SPD needs to allow more amenities like water supplies to make it easier for the boater community.	No change proposed. OPDC's Local Plan Policy P3 (Grand Union Canal) supports proposals that deliver a range of permanent and temporary moorings and supporting infrastructure along the canal. The SPD does not repeat policies in the Local Plan but should be read in conjunction with it.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
156	N/A	Local resident	General	Regarding the policy on mitigating towpath overcrowding – I don't think there is overcrowding; there is a lack of consideration for pedestrians by male towpath cyclists. We need some practical measures like providing 1) a dividing line down the middle of the towpath and 2) in the future separate surfacing for pedestrian and cycling lanes as well as green planting, I think canal accessibility should be improved by having more signage and more DDA compliant ramps.	No change proposed. The Industrial SPD focuses on industrial development and development that happens on/within sites, so its remit does not extend to public realm along the canal. OPDC's Local Plan Policy P3 (Grand Union Canal) sets out a range of measures to improve the public realm and movement along the canal. OPDC is also preparing a Public Realm and Green Infrastructure SPD to provide more detailed guidance on these issues.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
157	N/A	Local resident	General	I see that the plan is advocating more “rubbish bins with sufficient capacity (to avoid overfilling) to be provided at key locations of public activity, where access required for emptying the bins can be provided for” but I think that because local workers and visitors are having drinking sessions by the canal, we need more local authority resources for emptying these bins and having patrols to prevent and discourage such extended drinking sessions and littering.	Noted. OPDC has been working with the host boroughs to improve waste collection in the area. The Industrial SPD focuses on industrial development and development that happens on/within sites, so its remit does not extend to public realm along the canal. Boroughs are responsible for waste collection, including public bins, within the OPDC area. However, OPDC has developed projects to try and instigate positive changes including working with the Canal and River Trust and volunteers to pick up litter. This is signposted in section 10 of the SPD.
158	N/A	Local resident	Chapter 7	Greening Policy I see that the OPDC aims to integrate green infrastructure across Old Oak/Park Royal and achieve a significant net gain for biodiversity in line with the Environment Bill on every development but all the evidence is the OPDC simply wants high rise development in Old Oak with tiny, tokenistic ‘bowling green’-type spaces within them – the corporation’s actions completely undermine its fine own policy words.	Noted. Within mixed use developments OPDC’s Local Plan requires that schemes deliver a minimum 30% public open space and the Local Plan also identifies locations where 2 new minimum 2ha local parks should be delivered. The Industrial SPD includes a section dedicated to green infrastructure as OPDC wanted to provide clear guidance on how industrial development can contribute

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>The OPDC needs to listen to local people and start to provide much larger green areas within new industrial and housing developments. If we are to suffer thousands of homes at Channel Gate, residents need to see meaningful proposals from the OPDC for a proper town park that becomes a destination in its own right and not the feeble efforts we have seen to date from the corporation's planners.</p>	<p>towards greening the area without compromising operations. Please note that the OPDC Local Plan identifies opportunities for larger green spaces and the forthcoming Public Realm and Green Infrastructure and Old Oak West SPDs will provide more detailed guidance in relation to this.</p>
159	N/A	Grand Union Alliance	General	<p>On behalf of the Grand Union Alliance, I have the following observations to offer: As said during the on-line consultation event, discussion amongst representatives of local groups and individuals participating in monthly get togethers and at other times have been about the well known persistent failings of Park Royal as a place. This is something that is also evident in both the outputs of the Community and Place Review Groups on the draft SPD. And I believe these failings will be the subject of seeking remedies on the ground progressed through other lobbying.</p>	<p>Noted. We are working with the host boroughs on highways maintenance and waste management issues. The matters considered in the OPDC Local Plan and Industrial SPD focus on OPDC's role as a local planning authority. They do include issues related to improving public realm, transport and other infrastructure amongst other things and how these can be delivered through the planning process. OPDC does not own land within the industrial area, but works with partners on a range of projects to improve the area and support local</p>

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				<p>These failings as a planning matter are something that regeneration, public realm, transport, infrastructure etc. strategies/SPDs are better at in dealing with t scale rather than this proposed Industrial SPD which is necessarily focused on site development guidance. Nevertheless, it is welcomed that by having the Industrial SPD gradual incremental improvements can be achieved, albeit on a site-by-site basis at times and rate that the market largely determines.</p>	<p>communities. Project examples are provided in section 10 of the SPD.</p>
160	N/A	Grand Union Alliance	General	<p>As for the proposed SPD particularly welcomed are: The illustrations which graphically communicate aspects of the guidance in a very accessible way.</p>	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
161	30	Grand Union Alliance	Chapter 5	<p>As for the proposed SPD particularly welcomed are:</p> <p>That there is an expectation for development to respond the local industrial character as with the Park Royal typology of ancillary offices on street frontages and/or the Art Deco architecture of often surprisingly good design qualities setting a benchmark for new development. And that site enclosures, site access and other such matters often relegated as incidentals of minor consequence are recognised in the draft SPD as worthy of careful attention in order to deliver better developments within a better place. However, the SPD ought to encourage greater emphasis on retaining interesting decorative features, as with the lost railings to the Metal Refinery Bashley Road site that the Planning Committee asked to be retained, not only in the Character, Heritage & Sense of Place chapter but also in the Environmental Sustainability chapter - recycling/circular Economy section to encourage reuse/relocation elsewhere.</p>	<p>Change proposed. Amendments have been made to Principle ICP1 and its supporting text to refer to other features and how this can support waste reduction and the circular economy.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
162	31	Grand Union Alliance	Chapter 7	Welcomed again is the emphasis on greening and biodiversity with the useful signposting of sources of information something that was lacking in the evidence document Biodiversity & Urban Greening Strategy. More promotion of the retention of existing trees is requested for they not only are established habitats but also act as foils softening the abruptness of change and provide a sense of continuity and familiarity of place. The draft SPD at paras 7.1 & 7.8 confirms that B2/B8 development, although encouraged, is not required by policy to meet the 0.3 urban green factor something which the Biodiversity & Urban Greening Strategy does not do so clearly.	Change proposed. Principle GIP4 has been amended to refer to retaining trees where possible.
163	N/A	Grand Union Alliance	General	The relevance of this Strategy as evidence could be strengthened by having its Context section refer not only simply supporting the [forthcoming] Public Realm & Green Infrastructure SPD and its Policy Context having up to date references to legislation, plans etc. status/dates. Whilst not necessarily contradictory, p12's outcome of 30 years and p13's objective of 35 years could be better reconciled for clarity.	Noted. The Biodiversity and Urban Greening Strategy is a supporting study informing the Industrial SPD, and the SPD includes the correct and up to date references to legislation and plans. OPDC's Local Plan (paragraph 6.32) states that Green Infrastructure and Open Space Strategies and Management Plans (GIOSMMP) should explain how habitats and biodiversity

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
					will be managed, maintained and funded in perpetuity once the site is occupied. Management arrangements will be appropriately secured through conditions by OPDC. OPDC seek to secure GIOSSMPs on this basis.
164	N/A	Grand Union Alliance	Chapter 7	Green walls (p30) and Trellis Climbers (pp34/35) are referred to in the Strategy and whilst would indeed assist large footprint/floor plate buildings achieved desired levels of biodiversity net gain, it is understood that they are now considered to be a potential fire hazard in times of drought which are increasingly likely as climate change advances.	No change proposed. These references are in the OPDC Biodiversity and Urban Greening Strategy which was produced before the fire regulations changes. The SPD focuses on green roofs and boundaries; landscaping/staff amenity; and tree planting as the key opportunities to contribute towards biodiversity net gain and urban greening factor.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
165	N/A	Grand Union Alliance	Chapter 6	The creation of active & positive frontages that include retail has to be carefully done. What has happened in Park Royal is that retail and hospitality has generated congestion and obstruction to free movement to the detriment of the economic functioning of other businesses. What the Place Review Group saw as an advantage with "activity spilling over into the streets" is seen by locals as distinctly harmful.	No change proposed. OPDC's Local Plan policies support the use of positive and/or active frontages. The focus is not solely on active frontages, both the Local Plan and SPD also refer to positive frontages - an example of which could be including ancillary office uses on the ground floor street frontage. Principle ICP2 part d) is very clear that OPDC expects any ancillary uses should not compromise the function/integrity of SIL if the proposal is located there; and usually be focussed onto key routes. Supporting text to Principle BFP5 already explains that active frontages are more likely to be prioritised along the highest order routes in OPDC's Street Family.

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166	20	Grand Union Alliance	General	The Canal Placemaking Study is another useful evidence document, but only Part 1 of 2 was in the consultation pack as presented to the Board. Part2 'Listening to the Grand Union Canal' is a very good record of public opinion as captured through a best practice engagement exercise. As this informed Part 1 it would be advantageous for the record to reference Part 1 as part of the evidence.	Change proposed. Both parts of the Canal Placemaking Study are now referenced.
167	N/A	Grand Union Alliance	General	The EDI Statement adds a very interesting dimension to the draft SPD and its suite of documents revealing justifications for relevant parts of the draft SPD that are rooted in the 'lived experiences' of people living, working and visiting the MDC's area. Perhaps it is presently a rather skeleton framework , but no doubt this progressive body of work will grow in future iterations and other SPDs.	Noted.
168	N/A	Environment Agency	General	The intensification of development will put more receptors in proximity to industrial activities and waste sites which will have a residual impact on their neighbours. Where existing sites are presently regulated under Environmental Permits, the onus is on the	No change proposed. The London Plan (Policy D13) and OPDC Local Plan (Policy D5) policies on the Agent of Change will ensure that new development does not compromise the function of employment uses. Principle

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
				new development to protect the new receptors from the existing baseline and not inhibit future developments or changes to technologies on the permitted facilities. A map showing the existing sites that are regulated by us under Environmental Permits is attached as appendix 1.	BFP1 is aligned to these policies and lists some design considerations for mixed use proposals. Local planning authorities also have to plan for waste needs, including allocating sufficient sites, identifying suitable areas and facilities to manage waste. OPDC adopted the West London Waste Plan and its own Local Plan, which explain how OPDC plans specifically for these industrial uses.
169	20	Environm ent Agency	General	All regulated facilities would need to comply with the relevant BREF documents	Change proposed to refer to other requirements in the introduction to section 8 (Mitigating Impacts) and section 9 (Environmental Sustainability).
170	32	Environm ent Agency	Chapter 8	Due to air quality concerns, certain activities will no longer be consented in open yard areas and must be within a building. We encourage this approach for other industrial processes too, as it better controls air emissions, reduces the quantity of yard/ service area runoff and increases clean roof drainage which can be used in industrial processes or can support OPDC objectives for green infrastructure and biodiversity net	Change proposed. Principle MIP1 and the supporting text has been amended to consider opportunities for activities to be enclosed within buildings.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
				gain, and may also have visual and aesthetic benefits.	
171	N/A	Environm ent Agency	Chapter 7	Biodiversity net gain (BNG) can be encouraged along blue and green corridors such as the Grand Union Canal. This can increase stand off from waterways, improve access and recreation areas and allow for maintenance. We encourage an increase beyond the mandatory 10% BNG for your 'Ambition' target.	No change proposed. Principle GIP1 guides applicants towards delivering a biodiversity net gain (BNG) equal to or greater than 10%, which includes scope for BNG to be higher than 10%. Also Ambition GIA1 already encourages proposals to achieve an urban greening factor (UGF) of 0.3 or more. Achieving this level of UGF should also help to increase the BNG beyond 10%.
172	15	Environm ent Agency	Chapter 6	Regarding elevated open spaces, these are to be treated with caution as this may bring receptors closer to stacks, vents and chimneys which may be hazardous to human health. It may also require extending higher emission points to protect receptors and this could alter the skyline and have visual impacts to the wider area. The same may be true for rooflines. We support the principles for frontages of units, but the roofline within the complex should be functional and avoid confined spaces which	Change proposed. Principles and the supporting text have been amended to cross reference and clarify that functional requirements should be considered.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				could disrupt dispersion from emission points.	
173	33	Environment Agency	Chapter 8	For drainage, the area has extensively been used for industrial processes and there may be a considerable amount of made ground present. We encourage the use of SuDS, but avoiding discharge into made ground as this could mobilise contaminants and pose a risk to groundwater. As the site is underlain by the London Clay formation, there is little scope for infiltration techniques, so to maintain greenfield runoff rates storage and attenuation tank systems will be critical to avoid overloading drainage. By separating clean roof drainage and encouraging the use of greywater reuse systems, this may further help reduce impact to drainage systems and support the aims of the OPDC Integrated Water Management Strategy.	Change proposed. OPDC's Local Plan Policy EU3 supports on site source control with a priority for vegetated Sustainable Drainage Systems (SuDS), with other solutions, including below ground attenuation, only deemed acceptable where all vegetated options have been fully explored. The SPD is aligned to this. OPDC Local Plan Policy EU13 will also ensure that proposals that effectively treat, contain or control any contamination so that it does not affect any watercourse, water body or aquifer. However, the supporting text has been amended to clarify that consideration should be given to avoiding discharge into made ground.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
174	20	Environm ent Agency	Chapter 8	Industrial uses which hold or store materials which pose a risk to groundwater must do so in line with CIRIA C736 Design of containment systems for the prevention of water pollution from industrial incidents. This may require isolated secondary containment systems independent from the site drainage.	Change proposed to include additional reference to CIRIA guidance.
175	20	Environm ent Agency	General	New developments within the Strategic Industrial Location (SIL) which include combustion plant, including back-up generators, will likely require Environmental Permits to comply with Medium Combustion Plant regulations. This may be relevant to data centres and other developments with boilers or heating systems in addition to the existing regulated industries.	Change proposed to the introduction to section 9 (Environmental sustainability) to include general reference to other EA requirements that might apply.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
176	20	Environm ent Agency	Chapter 9	<p>We encourage the use of sustainable designs to minimise the environmental impact of development through specifications, product selection and building techniques.</p> <p>Schemes such as Cradle to Cradle Certification and the ethical stone register can support the circular economy, encouraging products which are sustainable and/or can be recycled or used. This approach requires designers and contractors to incorporate the environmental footprint into their proposals to ensure they use the most sustainable products and techniques whilst ensuring they remain fit for purpose.</p>	Change proposed to the supporting text and signposts to reference Cradle to Cradle and the Ethical Stone Register.
177	N/A	Environm ent Agency	General	<p>For sites we regulate, permit holders have a duty to seek improvements in environmental performance at their sites. Their permit conditions can require “a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.”. However once a permit is issued a facility may already be constructed. By considering this at the planning stage</p>	Noted. The SPD does not and cannot create new policies; it can only provide more detailed guidance on adopted planning policies. OPDC's Local Plan includes a suite of sustainability policies that seek to deliver better quality outcomes. The SPD responds to this through the development of Principles. The SPD also includes Ambitions which encourage applicants to deliver best

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>further improvements may be realised. To address this, we encourage challenging “construction industry standard practice” to seek improvements to improve sustainability and use innovative approaches for better infrastructure which protects human health, the local and wider environment impacts. We would like the SPD to challenge development to implement innovative solutions which deliver environmental benefits. This is supported by Policy EU1 in the OPDC Local Plan.</p>	<p>practice, but proposals aren’t required to adopt these.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
178	N/A	Environment Agency	General	<p>Twyford tip to the western end of the SIL is the only historic landfill within the plan area and requires detailed consideration. There has been concern in the past with drainage and landform stability to the north of the site and emissions to the North Circular road. This poses a significant risk to the environment and human health on site and beyond the site boundary. We encourage development which will reduce these risks and safely bring the site back into beneficial use. Any storage, treatment and redeposit of waste on the site will require authorisation in line with an environmental permit and any removal of excess historic waste from the site must be under duty of care requirements and taken to a suitable environmental permitted facility for the treatment, recovery, or disposal of the waste.</p>	<p>Noted. OPDC does not own the site and only has statutory powers related to its role as a local planning authority. In this capacity, we have contacted the Environment Agency to understand the issues to see if we can assist in liaising with the relevant local authority (Brent). The scope of the SPD does not include a detailed development framework for any industrial sites in the OPDC area.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
179	34	Environment Agency	Chapter 8	<p>We recommend that the SPD gives consideration of groundwater and land quality issues in the document. There are some sensitive receptors with respect to groundwater that should be identified. To the northwest of the SIL area by Stonebridge are superficial deposits of Alluvium and Taplow Gravels whilst Secondary A Claygate Member bedrock is present by Hangar Lane station. Secondary A aquifers are defined as "permeable strata capable of supporting water supplies at a local rather than strategic scale and in some cases forming an important source of base flow to rivers". There is a comprehensive land contamination policy in the OPDC Local Plan, Policy EU13 and its supporting text, where Environment Agency documents 'Model Procedures for the Management of Contaminated Land' and 'Managing and reducing land contamination: guiding principles' are referred to. This could be signposted here.</p>	<p>Change proposed. Amendments have been made to refer to the named sensitive receptors in section 2 (Context summary). OPDC's Local Plan Policies EU13 already considers land quality/contamination issues. The SPD does not repeat policies in the Local Plan and should be read in conjunction with it.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
180	20	Environment Agency	LCP1	<p>The policy contributes to the protection of health. We support that the 'Agent of Change' is referred to in the considerations. The policy 'signposts' on p.13 of the SPD should include reference to London Plan Policy D13 Agent of Change.</p> <p>With respect to regulated waste operations, the relationship within and outside the SIL between industrial and commercial uses and regulated waste operations should be considered. This may raise concerns about the limitations and /or displacement of waste operations within SIL. Waste management activities do not always make good neighbours. Good planning should identify the appropriate types of industrial activity in the right area, and mitigation measures, if they are needed, to ensure compatibility between proposed and existing uses.</p> <p>Combustion and fuel storage elements of a data centre may require an Environmental Permit. It is advised that the 'Check if you need an environmental permit guidance' is consulted for any specific permitting requirements and if further guidance is</p>	<p>Change proposed to include additional signposts to London Plan policy D13 and to include general reference to other EA requirements that might apply in the introduction to section 9 (Environmental sustainability). Strategic Industrial Locations are protected for a range of industrial functions listed in the London Plan. Local planning authorities also have to plan for waste needs, including allocating sufficient sites, identifying suitable areas and facilities to manage waste. OPDC's adopted the West London Waste Plan and its own Local Plan, which explain how OPDC plans specifically for these industrial uses. The policies related to Agent of Change should also ensure that industrial uses are not compromised.</p>

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				required then the Environment Agency should be contacted. https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit	
181	20	Environment Agency	MP1	This section needs to reference the London Plan, Policy SI1 'Improving Air Quality', and the related AQ Positive London Plan Guidance (see links below) as these measures fit with that policy. This comment also applies to MP4 and MA4 below.	Change proposed. Additional references have been signposted in Movement Principles that support people to walk and cycle to work.
182	20, 39	Environment Agency	MA3	This policy contributes to climate resilience and improving health. It also encourages low carbon transport modes. The following sections could be improved as follows: c) iv) allowing fleets to go up to the ULEZ limit may not be sustainable over time. We should encourage them to go beyond this to further reduce emissions where possible.	Change proposed. The text has been amended to reflect and cross reference to Principle/Ambition MIP1/ MIA1 which seek to maximise the use of zero emission operational vehicles and to clarify the reference to electric charging. Local Plan Policy T4c)i) requires infrastructure for electric vehicles in all new operational non-

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				c) vii) This should go further to ensure development contributes to the Mayor's and OPDC's net zero policy objectives. We recommend that all developments provide at least 50% of spaces with electric charging, currently there is no commitment to provide any. It should consider the needs of future users.	residential car parking spaces and this policy is already signposted in this section. London Plan Policy T6 has now been added as an additional reference.
183	N/A	Environment Agency	MP4	This policy contributes to climate resilience and improving health. It also encourages movement by water and rail.	Noted.
184	N/A	Environment Agency	MA4	This policy contributes to climate resilience and improving health. It also encourages movement by water and rail.	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
185	N/A	Environment Agency	BFP1	<p>The policy contributes to the protection of health. We support that the 'Agent of Change' is referred to in the considerations and welcome the context overview. BFP1 could be improved. Please consider the following</p> <p>b) The policy should acknowledge that some industrial activities will pose a significant impact on nearby receptors, even where all practical mitigation has been adopted. This can include mineral and waste processing, or other regulated industry. Environmental permits may minimise impacts but not remove them. This can lead to complaints about odour, poor air quality and noise and other amenity concerns. Such activities may no longer be appropriate within the scheme. The SPD should consider how this can be addressed as it will either create impacted receptors from existing development or will prevent new development from being included in the SPD.</p> <p>We see many instances across London where new residential development is located adjacent to existing industrial</p>	<p>No change proposed. Strategic Industrial Locations are protected for a range of industrial functions listed in the London Plan. Local planning authorities also have to plan for waste needs, including allocating sufficient sites, identifying suitable areas and facilities to manage waste. OPDC's adopted the West London Waste Plan and its own Local Plan, which explain how OPDC plans specifically for these industrial uses. The policies related to Agent of Change should also ensure that industrial uses are not compromised.</p>

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				<p>especially waste sites, that is, co-location. In applying the agent of change principle, developers should be encouraged to liaise at an early stage with existing industrial sites' operators on impact mitigation. This could include, for example, developer contribution to the cost of enclosure of a waste site.</p> <p>To re-emphasize, because an existing site is permitted under Environmental Permitting Regulations and regulated by the Environment Agency, this will not eliminate it as a potential source of pollution within the constraints of the Regulations. There will continue to be residual impact on new sensitive receptors. If waste sites are displaced, or have new operational conditions imposed as a result of new activity, there is likely to be a negative impact on London's waste capacity.</p> <p>Regarding H) I, this references all new industrial, but the enclosure of new waste sites should be required in accordance with Local Plan policy EU4 and London Plan, Policy SI 8.</p>	

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
186	15	Environm ent Agency	BFP2	<p>The policy contributes to climate resilience. It is good to see links to Green Infrastructure measures and to natural light. You could consider expanding BFP2 to cover shadow, shade and turbulence. This links to OPDC LP Policies SP9 and D5.</p> <p>In addition: c) v) access to plant may be required as part of mitigation to minimise environmental impact, discharge vents and stacks will require clear airflow and adequate modelling to ensure they don't pose risk to human health. c) vi) providing access to the roof may compromise mitigation measures related to stacks and vents and pose significant risk to human health.</p>	Change proposed. OPDC's Local Plan Policy D5 expects proposals to deliver an appropriate standard of amenity including maximising the quality and availability of daylight and direct sunlight to the public realm, as well as minimising excessive wind speeds so issues of shadow, shade and turbulence would be assessed against this policy. However, Principles and the supporting text have been amended to cross reference and clarify that functional requirements should be considered as part of rooftop amenity/design.
187	N/A	Environm ent Agency	BFP3	<p>The policy contributes to climate resilience. It is good to see links to Green Infrastructure measures and to natural light.</p>	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
188	N/A	Environment Agency	BFP4	The policy contributes to climate resilience. It is good to see links to urban greening, biodiversity and drainage. There is scope to support the SPD re: Principle GIP2 in regards water management. Could site layout etc, go further to support the OPDC Integrated Water Management Study measures?	No change proposed. OPDC's Local Plan requires development to achieve greenfield run-off rates and minimise water usage, achieving BREEAM outstanding for water efficiency. Both the Local Plan and SPD seek to prioritise the role that vegetated SuDS plays in meeting greenfield run-off requirements. Each site will differ in terms of how it approaches these policy requirements, and it is therefore not considered appropriate or necessary for the SPD to provide further guidance on these matters others than what is already included.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
189	35	Environm ent Agency	BFP5	The policy contributes to climate resilience. This could support encouragement for hedging / landscaping.	Change proposed. Principle BFPa) ii) supports the use of hedges/landscaping instead of standalone fencing. Additional text has been added to Principle GIP2 to also encourage the planting of hedges
190	35	Environm ent Agency	GIP1	This policy contributes to climate resilience, BNG and public health. There are excellent links to GI / BNG aims in the London Plan / OPDC Local Plan. We recommend that the section 'Intro' (page 54) sets out the benefits to developers / owners / users e.g building user comfort / satisfaction, supporting net zero objectives, potential to reduce building energy consumption.	Change proposed. The introduction to section 7 has been amended to refer to the advantages of providing green infrastructure.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
191	35	Environm ent Agency	GIA1	See comments for GIP1 above.	Change proposed. The introduction to section 7 has been amended to refer to the advantages of providing green infrastructure.
192	N/A	Environm ent Agency	GIP2	This policy contributes to climate resilience, BNG and public health. There are excellent links to GI / BNG/ sustainable water and energy use aims in the London Plan / OPDC Local Plan.	Noted.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
193	N/A	Environm ent Agency	GIA2	Comments as GIP2 above.	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
194	36	Environment Agency	GIP3	This policy contributes to climate resilience, BNG and public health. There are excellent links to GI / BNG aims in the London Plan / OPDC Local Plan. Is there scope to also encourage access to and along the canalside?	Change proposed to amend Principle GIP3 so that it aligns with Principles ICP2 and BFP1 by referring to improving access to the canal.
195	20	Environment Agency	MIP1	The policy contributes to an improvement in public health. To improve the principle there should be a signpost to OPDC Local Plan Policy EU4. The requirements need to be expanded upon within the text to be clearer, rather than rely on the 'signpost'. It should specifically mention London Plan Guidance' on AQ neutral and AQ-ve requirements (see links below), and state that developments will be required to comply with those e.g. to submit an AQ neutral assessment as laid out in the LPG. Our reason for expanding this point is that these are flagship Air Quality planning policies in the London Plan and the OPDC	Change proposed. Policy EU4 is already signposted under this part of the document. The SPD does not repeat policies in the London Plan and Local Plan and should be read in conjunction with it. The Principle and covers all generators not just those used for emergency or stand by purposes, therefore it is considered that appropriate for proposals to prioritise lower or zero emission alternative gensets. The text states that generators powered using fossil fuels will not typically be permitted – this would be judged on a case by case basis. However, amendments have

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>is such a high profile SIL it should lead the way on Air Quality neutral and and AQ-ve, so others can follow this model.</p> <p>Regarding generator requirements, there is uncertainty whether it is it is possible for stand-by emergency generators e.g. at data centres, to meet the criteria required in the current text para 8.7. In fact stand-by emergency generators are exempt from the requirements of AQ Neutral in London Plan Guidance (see LPG https://www.london.gov.uk/sites/default/files/2023-02/Air%20Quality%20Neutral%20LPG.pdf. See para 3.3.1 of the LPG).</p>	<p>been made to signpost to relevant London Plan guidance.</p>
196	20	Environment Agency	MIA1	<p>This needs to be more ambitious and state that all developments meet the requirements of London Plan Policy SI1 and especially AQ Neutral and AQ Positive as set out in the relevant LPGs see https://www.london.gov.uk/sites/default/files/2023-02/Air%20Quality%20Neutral%20LPG.pdf and https://www.london.gov.uk/sites/default/files</p>	<p>Change proposed. The SPD does not repeat policies in the London Plan and Local Plan and should be read in conjunction with it. Policy S11 is already signposted. However, amendments have been made to signpost to relevant London Plan guidance.</p>

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
				/2023-02/Air%20Quality%20Positive%20LPG.pdf	
197	20	Environm ent Agency	MIP4	<p>The policy contributes to climate resilience, biodiversity, surface water flood risk reduction. It gives excellent links to the sustainable water management aims in the London Plan / OPDC Local Plan. It is good to see c) and d) consider contamination issues and ways in which these can be dealt with as part of a drainage strategy for a site.</p> <p>The Environment Agency's Approach to Groundwater Protection outlines a number of position statements regarding SuDS and other drainage systems. All developments should consider Section G of this document. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environm-ent-Agency-approach-to-groundwater-protection.pdf</p>	Change proposed. OPDC's Local Plan Policies EU13 considers land quality/contamination issues. The SPD does not repeat policies in the Local Plan and should be read in conjunction with it. However, the EA document has been added to the list of signposted documents.
198	N/A	Environm ent Agency	MIA4	<p>The policy contributes to climate resilience, biodiversity, surface water flood risk reduction. It is a good ambition to have water efficiency above the London Plan standards by greater than 25%.</p>	No change proposed. The London Plan policy SI5 and OPDC Local Plan policy EU3 expects proposals to achieve the BREEAM maximum standard for the 'Wat 01' water category or equivalent (commercial development). The SPD

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				You could consider strengthening MIA4 by directly referencing the 'at least BREEAM Excellent' requirement for water efficiency for commercial in London Plan, Policy SI 5. You could consider if BREEAM 'Outstanding' might be realistic to benchmark for water use, in similar way to ESP1 below.	does not repeat policies in the Local Plan and should be read in conjunction with it.
199	N/A	Environment Agency	ESP1	This policy contributes to climate resilience and sustainable energy. We welcome encouragement for achieving BREEAM 'Outstanding'.	Noted.

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
200	N/A	Environm ent Agency	ESA1	See comments for ESP1 above.	Noted.
201	42	Environm ent Agency	ESP2	This policy contributes to climate resilience. We welcome the commitment to sustainable construction but are unclear where the >20% figures are derived at point d).	Change proposed. The target is based on OPDC Local Plan policy EU8 but the text has been amended to clarify the wording.
202	42	Environm ent Agency	ESA2	We welcome the aspiration of this policy but it would benefit from understanding how achievable this is. It is unclear where the >40% figure is derived from at point g). (SW)	Changed proposed. The Ambition wording has been changed to align with the London Plan Guidance on Circular Economy Statements (March 2022).

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
203	N/A	Environment Agency	ESP3	This policy contributes to climate resilience. Welcome encouragement for 'futureproofing' for underground ducting for electric vehicle charging. Could this be expanded to other utilities, including heating / cooling systems?	No change proposed. OPDC's Local Plan policy EU10 supports proposals that future proof development so that they can connect into a low carbon district heating/cooling network if and when it becomes available.
204	N/A	Environment Agency	ESA3	See comments for ESP3 above.	No change proposed. OPDC's Local Plan policy EU10 supports proposals that future proof development so that they can connect into a low carbon district heating/cooling network if and when it becomes available.
205	N/A	Environment Agency	ESA4	This policy contributes to the circular economy and achieving net zero. There are opportunities for waste operations within the SIL to contribute to the local circular economy as SIL sites are upgraded / redeveloped. Are there opportunities for Energy from waste which can be identified or encouraged?	No change proposed. Strategic Industrial Locations are protected for a range of industrial functions listed in the London Plan. Local planning authorities also have to plan for waste needs, including allocating sufficient sites, identifying suitable areas and facilities to manage waste. OPDC's adopted the West London Waste Plan and its own Local Plan, which explain how OPDC plans specifically for these industrial uses.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
206	N/A	CBRE on behalf of SEGRO	General	<p>SEGRO is a UK Real Estate Investment Trust (REIT), and a leading owner, manager and developer of modern warehouses and light industrial property. It owns or manages 6.4 million square metres (69 million square feet) of space, serving customers from a wide range of industry sectors.</p> <p>In Greater London, SEGRO's portfolio extends to over 12.5 million square feet of light industrial and urban logistics space and is home to over 420 customers operating from 55 estates across the capital. These customers, which include major businesses such as Rolls Royce, Brompton Bike, British Airways, Ocado, John Lewis, DHL, employ over 20,000 people and operate in a range of sectors from e-retailing to manufacturing, TV and media to aerospace and automotive to food production.</p> <p>SEGRO has a number of sites within OPDC boundary including the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> SEGRO Park Coronation Road <input type="checkbox"/> Origin, Park Royal <input type="checkbox"/> Tudor Industrial Estate <input type="checkbox"/> Premier Park 	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<input type="checkbox"/> Victoria Industrial Estate <input type="checkbox"/> SEGRO Park Westway Both Victoria Industrial Estate and SEGRO Park Westway are allocated within the OPDC Local Plan (2022) for mixed-use development and the other sites are located in the Park Royal Strategic Industrial Location (SIL).	
207	N/A	CBRE on behalf of SEGRO	General	SEGRO fully support the ambition to improve the environment across Old Oak Park Royal and ensure the health and safety of people within the it. SEGRO also support the OPDC’s ambition to provide guidelines to ensure future industrial development is of sufficient design quality, sustainable, and minimises impacts. However, there are a number of points of concern, summarised below.	Noted.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
208	7, 8	CBRE on behalf of SEGRO	General	<p>The guidance in the SPD is very detailed and effectively provides a design code for future industrial developments. SEGRO have a large amount of experience in developing industrial schemes of a variety of different sizes across London and it is clear that each site needs to be developed to take into consideration the size, shape, general constraints and market demand. Some of the principles within the SPD will not be suitable for all sites and this needs to be recognised within the policy document. For example, the 'Park Royal Typology' (which consists of a purpose-designed street facing 'block' sitting as a buffer between the road and a much larger warehouse or industrial shed) will not always be the optimal site layout.</p>	<p>Change proposed. OPDC's Local Plan policies support the provision of employment space across a range of sizes, types and forms and expects developments to be well designed for their intended purposes having regard to providing flexibility for different industrial activities. Therefore, OPDC consider that there is flexibility for a full range of market needs to be met, in line with relevant evidence base. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis. There are also amendments to the supporting text explaining that the Park Royal typology should be tested as an option within Design and Access Statements and a clear explanation given if an alternative approach is proposed after testing.</p>

Com ment refer ence	Modifi cation referen ce if applica ble	Organisa tion	Chapter/ Para/Figu re Ref.	Comment	OPDC Response
209	8	CBRE on behalf of SEGRO	Chapter 6	The Built Form chapter's principle of breaking up large blocks to increase permeability is problematic, and threatens the intensification policies in the London and OPDC Local Plan. Achieving intensification is challenging on a small footprint.	Change proposed. OPDC considers that there are opportunities, particularly on larger sites, to increase permeability by creating new accesses/breaks. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
210	N/A	CBRE on behalf of SEGRO	General	Policies such Principle ICP2 (Amenities and supporting facilities for businesses and their employees) and Principle BFP5 (Building lines, boundary treatments and frontages) promote incorporation of ancillary uses at ground floor where possible. Examples include food markets and exhibition/performance space. We consider that the SPD's focus on ancillary uses could be more targeted – much of the core industrial area could not sustain the types of customer-facing ancillary uses the SPD promotes, due to limited footfall. These uses should be clustered in more neighbourhood areas.	No change proposed. Principle ICP2 does not set out specific ancillary uses and instead focuses on their relationship with the industrial use. Some examples are given in the supporting text, but these are hypothetical. Part d) is very clear that OPDC expects any ancillary uses should not compromise the function/integrity of SIL if the proposal is located there; and usually be focussed onto key routes. Supporting text to BFP5 also explains that active frontages are more likely to be

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
					prioritised along the highest order routes in OPDC's Street Family.
211	37	CBRE on behalf of SEGRO	General	There is a general concern that the imagery within the SPD is not realistic for larger-scale typical warehousing/industrial buildings which focus on intensification and efficient and practical layout (function-first), as opposed to street scene and customer facing activities which are more akin to high street activities and Class E uses. For example, those images shown below, which suggest a town-centre type spill-out space and street-fronting activities to the majority of units. We would recommend a hierarchy of routes/places, where active street	Change proposed. Principle ICP2 does not set out specific ancillary uses and instead focuses on their relationship with the industrial use. Some examples are given in the supporting text - this is not limited to retail - but these are hypothetical. Part d) is very clear that OPDC expects any ancillary uses should not compromise the function/integrity of SIL if the proposal is located there; and usually be focussed onto key routes. Supporting text to BFP5 also explains that active

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				frontage is more/less of a priority, as it is can compromise efficient layouts and operational capacity.	frontages are more likely to be prioritised along the highest order routes in OPDC's Street Family. However, additional text has been included in the Introduction (section 1) to explain the role/limitations of the illustrations.
212	8	CBRE on behalf of SEGRO	Chapter 7	There are concerns with the practicality of the urban greening ambitions within Ambition GIA1, which encourages all developments (within and outside SIL) to achieve an Urban Greening Factor of 0.3 or more. To illustrate the difficulties of achieving this ambition, SEGRO's landscape architect (TALA) has collated the scores of recent industrial schemes within London which are of similar context (i.e. not within green belt or of existing high ecological value).	Changed proposed. 0.3 target is included as an Ambition; where OPDC is encouraging developers/applicants towards best practice. OPDC understands that it may be challenging on some sites to achieve this but the Ambition provides OPDC with an opportunity to maximise urban greening where possible. OPDC already includes 0.3 as a target score in planning conditions and works with applicants to test this through detailed landscape/green infrastructure proposals. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
					circumstances and these would be considered on a case by case basis.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
213	8	CBRE on behalf SEGRO	MP1	<p>SEGRO agree with the principle within Part (b) of Policy MP1 of providing active frontage with dedicated building entrances/natural surveillance.</p> <p>However, provision of windows into the warehouse at street level in particular can cause security concerns for Class B2 and B8 occupiers if this results in views into warehouse space. Therefore, design for such units will need to balance requirements for activity and surveillance with the occupier security requirements.</p>	Change proposed. Additional text has been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
214	8, 38	CBRE on behalf of SEGRO	MP3	<p>Part a (ii) of this policy outlines that both within and outside SIL developments should 'consider' shared yards/servicing areas within sites and between adjoining sites/properties to optimise the use of the land.</p> <p>SEGRO understands the aspirations to optimise the use of land. However, we do have significant concerns over the</p>	Change proposed. Text has been amended in MP3 to clarify this is for industrial users. Additional text has also been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>requirements to consider shared yards/servicing both within sites and between adjoining site/properties. SEGRO has undertaken a health and safety audit over all of their operational/emerging sites and there are problems identified where different occupiers have shared yard space from a health and safety perspective and this is not something that can be readily achieved. We appreciate this policy only requires shared yard/servicing areas to be considered, but this is not something SEGRO could accommodate in any future schemes in the OPDC.</p> <p>This part of the policy should be deleted or amended to acknowledge that shared yards/servicing areas can often not be accommodated due to health and safety concerns.</p>	
215	7	CBRE on behalf of SEGRO	ICP1	<p>All SEGRO developments seek to demonstrate how proposals respond to local context and reuse/retain materials, buildings wherever possible in line with the aspirations of parts (a) and (b) this policy. However, we are concerned that all developments within and outside of the SIL</p>	<p>Change proposed. Additional supporting text explaining that the Park Royal typology should be tested as an option within Design and Access Statements and a clear explanation given if an alternative approach is proposed after testing.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>should also seek to reflect the Park Royal typology of a purpose-designed street facing block sitting as a buffer between the road and a larger warehouse or industrial shed to the rear.</p> <p>Whilst we understand this aspiration, we do not consider that all industrial sites will suit such a typology in terms of size, shape, orientation, constraints and the type and size of commercial units needed. Some sites for instance will be better suited to a central road within an industrial development serving several units with offices/ancillary functions facing inwards rather than the Park Royal typology.</p> <p>This is particularly true for the provision of small warehouse units, which the Local Plan encourages, as any office elements needed are typically located above the loading doors – to 1) make efficient use of a part of the warehouse which wouldn't otherwise be useable; 2) maximise the usability of the warehouse space behind; 3) allow staff to monitor yard activities from the office space – which is especially important for a small business.</p>	

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>Further, in our experience multi-storey warehouses will not reflect the Park Royal typology, as the ground floor of the building has to work very hard to accommodate the servicing and deliveries of the multiple floors above.</p> <p>From our discussions, we understand that it is not intended that each scheme will have to provide a Park Royal typology and this will be considered as part of the design evolution process.</p> <p>Therefore, we consider the wording of part (c) of this policy should be amended to ensure development seeks to address the Park Royal typology 'where possible' although the policy should also recognise that this will not always be possible or the most appropriate solution for each site.</p>	
216	8, 37	CBRE on behalf of SEGRO	ICP2	<p>Part (c) of this policy seeks to ensure industrial development within and outside of SIL should seek to provide additional amenities including (i) ancillary uses that have a direct relationship with the uses on site; (ii) ancillary uses that are indirectly related to industrial uses on site; (iii) other</p>	<p>Change proposed. Principle ICP2 does not set out specific ancillary uses and instead focuses on their relationship with the industrial use. Some hypothetical examples are given in the supporting text, and these are not limited to retail. Part d) is very clear that any ancillary uses should not</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>town centre/social infrastructure uses that accord with Local Plan town centre policies. The imagery throughout the document largely shows ancillary uses as being active retail use whereas in reality the vast majority of sites will more likely bring forward office use as the ancillary function associated with the main industrial use. There are certain sites in proximity to town centres that may be more suitable for a more active retail space but the majority of the OPDC and in particular the SIL locations would not have the footfall to support such active retail uses and the majority of industrial occupiers will not have a requirement for a customer facing space as their focus is B2B. Such a requirement is so niche it would not be possible or desirable to design in such features for speculative development. We recommend the guidance is changed to cross reference other parts of guidance/Local Plan which identify neighbourhood centres and primary routes/nodes across the area where activity is to be focussed.</p>	<p>compromise the function/integrity of SIL if the proposal is located there; and usually be focussed onto key routes. Supporting text to Principle BFP5 also explains that active frontages are more likely to be prioritised along the highest order routes in OPDC's Street Family. However, additional text has been included in the introduction to explain the role/limitations of the illustrations. Additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
217	8	CBRE on behalf of SEGRO	BFP3	<p>SEGRO agree with the principles of this policy that industrial proposals should be of a high quality design (part a) and should break up massing through incorporating high quality and distinctive elements such as greening, circulation cores, fenestration etc (part b).</p> <p>There is some concern that part (e) requires where possible, reducing the size of blocks or consider breaks to increase permeability and create new accesses if opportunities to connect to walking or cycling routes exist. Large floorplate industrial floorspace is a key component of the area and such spaces should be encouraged to meet intensification policies within the London Plan, and to meet requirements for large units as SILs will be the only possible source of supply for these businesses. Larger floorplate spaces should be encouraged with an appropriate design solution rather than encouragement to provide smaller blocks (especially in SIL).</p>	Change proposed. OPDC considers that there are opportunities, particularly on larger sites, to increase permeability by creating new accesses/breaks. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
218	8	CBRE on behalf of SEGRO	BFP4	SEGRO support intensification policies within SIL. As per the comments under MP3 above, there are concerns over this policy	Change proposed. Additional text has been included in the Introduction (section 1) to explain that it may be

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				encouraging developers to explore the potential to share facilities within and across sites (i.e. health and safety concerns over shared yards).	more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
219	7, 8	CBRE on behalf of SEGRO	BFP5	<p>Building Line and Boundary Treatments Part (a) (i) requires proposals within the SIL to set building lines to the edge of the site, facing onto the street unless:</p> <ul style="list-style-type: none"> <input type="checkbox"/> this has a negative impact on the street; and/or <input type="checkbox"/> a positive forecourt is being maintained or provided linked to an active frontage in an acceptable location. <p>As outlined under Policy ICP2 above, not all industrial sites will be suitable in terms of size/shape, constraints to have a building line to the street edge facing onto the street. For instance, certain sites may be more suited to a central road providing access to industrial units on either side rather than the Park Royal typology development that seems to be encouraged under this policy. There should be more flexibility in this policy and the wording should be amended to add a bullet point as below:</p>	Change proposed. Additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis. Additional supporting text also explains that the Park Royal typology should be tested as an option within Design and Access Statements and a clear explanation given if an alternative approach is proposed after testing.

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				<input type="checkbox"/> site size and constraints dictate a more suitable typology of development.	
220	8	CBRE on behalf of SEGRO	BFP5	<p>Frontages and Signage</p> <p>Part (b) (i) of this policy states ground floor industrial frontages both within and outside of SIL should maximise the extent (length) of positive or active frontages, locating these based on OPDC's Street Family. We understand there will be more information on the street hierarchy/Street Family within the future OPDC Public Realm and Green Infrastructure SPD. The two pieces of guidance should speak to each other. As outlined previously it is difficult to provide large amounts of activity/ancillary uses with certain industrial</p>	<p>Change proposed. OPDC consider that it is possible for many different types of industrial uses to provide active or positive frontages. There are existing examples of industrial uses that include ancillary uses with active or positive frontages within the OPDC industrial area, including Use Class B8 uses with ancillary office and Use Class B2 uses with ancillary retail. In most cases the design and internal layout a building can be flexed appropriately to balance the need for active/positive frontages and functional requirements. OPDC's</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				development/sites. It should also be noted that buildings located on corner plots may have two frontages and it is even more difficult to provide activity and address more than one frontage. The principle elevation for activity should be agreed in the design process for such sites and the guidance should make reference to this being a constraint and an important part of the design process that should be discussed early on.	Local Plan policies already require proposals to maximise the use of positive and/or active frontages. The focus is not solely on active frontages, both the Local Plan and SPD also refer to positive frontages - an example of which could be including ancillary office uses on the ground floor street frontage. However, additional text has been included in the introduction to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.
221	8	CBRE on behalf of SEGRO	BFP5	Frontages and Signage Part (b) (ii) of this policy encourages windows and doors to that allow for good levels of visual permeability onto street. Whilst we recognise the benefits of street level activity, industrial occupiers often require their operations to not be visible to the public, and this needs to be factored into future policy.	Change proposed. Additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
222	9	CBRE on behalf of SEGRO	BFP8	<p>Part (a) of Policy BFP8 states that all industrial proposals within and outside of SIL should incorporate other industrial small units as part of the mix of units as well as affordable industrial workspace in line with Local Plan policies SP5, E1, E2 and E3 (as well as the Planning Obligations SPD). Policy E3 requires new employment proposals to incorporate affordable workspace, shared workspaces, and/or small business units (500 sq m or less) whereas the wording of Policy BFP8 suggests all proposals should incorporate small business units and affordable industrial and the requirements should be made clearer in the policy drafting. It is also worth noting that the Planning Obligations SPD outlines that only large industrial schemes will be expected to deliver on-site affordable workspace. To provide clarity, this guidance should read clearly across other SPDs and the local plan.</p>	<p>Change proposed. Amendments have been made to Principle BFP8 and its supporting text to clarify that proposals should comply with Local Plan policies and refer to OPDC's Planning Obligations SPD (POSPD). The POSPD provides more detailed guidance on how OPDC will negotiate and secure affordable workspace - either on or off site.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
223	8	CBRE on behalf of SEGRO	GIA7	<p>GIA1 sets an ambition for all industrial developments within and outside of SIL to:</p> <ul style="list-style-type: none"> a) achieve an urban greening factor of 0.3 or more, where a benchmark is not already set for this in the London Plan, and where possible given site coverage of buildings; and b) explore opportunities for space-efficient food production such as vertical farming and the use of hydroponic technology <p>SEGRO previously made detailed representations to the London Plan outlining the concerns with an Urban Greening Factor (UGF) of 0.3 being included within the London Plan for industrial development and this was subsequently removed from the policy on the recommendation of the inspectors. The UGF of 0.3 is not deliverable in viability terms due to the additional structure and subsequent cost required to include additional green roofs to meet such a target. The evidence submitted to the London Plan outlined that the additional steel and concrete required to increase the structure to support green roofs would increase embodied carbon levels by approx. 10%</p>	<p>Changed proposed. 0.3 target is included as an Ambition; where OPDC is encouraging developers/applicants towards best practice. OPDC understands that it may be challenging on some sites to achieve this but the Ambition provides OPDC with an opportunity to maximise urban greening where possible. OPDC already includes 0.3 as a target score in planning conditions and works with applicants to test this through detailed landscape/green infrastructure proposals. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
				<p>which has a negative sustainability impact (and would in turn result in less PVs being able to be delivered on roof level). We have undertaken a review of both SEGRO and other industrial schemes within London. The SEGRO sites score between 0.10 and 0.24 at the higher end whereas other industrial developers have scored between 0.07 and 0.18. SEGRO recognises the benefits of urban greening to our environment, our customers and our communities, which is why great effort is made to include greening measures, as demonstrated by high UGF scores vs the rest of the market. Whilst SEGRO supports the ambition to better urban greening, 0.3 is an unrealistic target, particularly in an area like Park Royal which offers the best opportunities in the country to achieve intensification. We understand this is an ambition which doesn't have to be met but we do not believe such an ambition should be included within the policy where it is not possible to meet this standard within the OPDC in a built-up area.</p>	

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
224	8	CBRE on behalf of SEGRO	GIA4	<p>SEGRO seek to maximise greening across their sites wherever possible. However, the ambition to achieve to a future tree canopy cover of between 20% and 30% based on the extent of mature tree canopy goals will likely be difficult to achieve in many circumstances and we again question whether such ambitions will be achievable in most cases.</p>	<p>Change proposed. The 20-30% target is included in as an Ambition; where OPDC is encouraging developers/applicants towards best practice. Trees provide multiple benefits and there are many existing examples of sites that already have trees on site as well as new industrial development schemes incorporating new trees. New trees can be planted so that they do not disrupt operations i.e. root barriers, selecting appropriate tree species based on the site conditions/layout. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>

Comment reference	Modification reference if applicable	Organisation	Chapter/Para/Figure Ref.	Comment	OPDC Response
225	8	CBRE on behalf of SEGRO	MIA1	<p>Part a (i) of the Ambition MIA1 targets 100% zero emission operational fleet vehicles. SEGRO seek to maximise the number of zero emission vehicles as part of their developments. At present, the technology is further advanced for electric Light Goods Vehicles (LGVs) compared to Heavy Good Vehicles (HGVs) although there are still only a very small number of larger occupiers who can commit to a electric LGV outbound fleet.</p> <p>The technology for electric/hydrogen Heavy Goods Vehicles (HGVs) is in its infancy and there are very few zero emission HGV vehicles at present across the UK and occupiers will not be able to commit so such targets for many years.</p> <p>It is not possible to meet the aspiration and therefore, similar to the comments on the UGF, we question whether an unachievable ambition should be included within the document.</p>	<p>Change proposed. Different industrial uses/operations will result in different fleet vehicles, including some that could be predominately LGVs where the technology is more advanced. However, additional text has been included in the Introduction (section 1) to explain that it may be more challenging to meet elements of the SPD guidance in certain circumstances and these would be considered on a case by case basis.</p>