OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Policy Formulation Reports
Places Chapter

October 2018

MAYOR OF LONDON

P1. Old Oak South

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Old Oak South Vision	The new HS2 station presents a significant regenerative catalyst and a huge opportunity to support proposals for high density development. Old Oak South will be a focal point for a mix of uses that optimise the proximity of Old Oak Common Station. This area will become a new commercial centre and will include a significant proportion of Old Oak's new office, commercial and retail space. Old Oak South is edged by the Grand Union Canal, an existing nature reserve to the north, and by Wormwood Scrubs to the south. Both of these features will be important place-making elements and buildings alongside them should support place-making aspirations through the highest quality design. Old Oak South will become a hub of activity where people will live, work and shop, with office, retail and leisure uses focussed around the new HS2 station and Old Oak High Street. Old Oak South will be integrated into its surroundings and this will require a series of bridges over the canal, new and/or improved access to Old Oak Lane, North Acton and Wormwood Scrubs.
Old Oak North Key Objectives	1. Be mixed use and make a significant contribution to the overall housing target of 24,000 homes and additional 55,000 new jobs in the Opportunity Area;

	2. Deliver a large quantum of new commercial space, including office, retail, hotel and leisure focussed around the new Old Oak Common station; 3. Facilitate delivery of a new High Speed 2, Crossrail and Great West Main Line interchange station (Old Oak Common station), a new London Overground station at Old Oak Common Lane and provision of new bus, taxi and cycle services; 4. Facilitate delivery of a new connection from the Crossrail line to the West Coast Main Line, should this prove necessary; 5. Locate town centre uses around the new stations and along Old Oak High Street; 6. Deliver a new and improved network of streets including; ƒ a new north-south Old Oak High Street; ƒ a new east-west Grand Union Street; ƒ new and improved access onto Old Oak Common Lane and an improved Old Oak Common Lane; a new street through the 'Shield' site connecting Old Oak Common station to North Acton; ƒ a new pedestrian/cycle connection (at a minimum) to the north side of Wormwood Scrubs; ƒ an improved accessible edge to the Grand Union Canal, ƒ new bridges over the Grand Union Canal connecting Old Oak South and North and ƒ better connections to Kensal Canalside Opportunity Area to the east. 7. Relocate, or significantly reconfigure the Crossrail depot and sidings to bring forward development on this land in a timely manner 8. Work with central Government on opportunities to release the IEP depot site for redevelopment in the future, where this proves to be feasible; 9. Encourage early delivery of areas such as the Oakland's House, North Pole East depot, North Acton and land along Scrubs Lane, where these sites support the comprehensive regeneration of the wider area; 10. Development should be mindful of existing residential communities at Wells House Road, Midland Terrace/ Shaftsbury Avenue, and the areas proximity to Wormwood Scrubs; 11. Development should provide an edge and new access points into Wormwood Scrubs whilst respecting its character and ecological value; 12.Provide a network of well-connected public spaces around Old Oak; Common station, and at Old Oak Lane station as well as a series of smaller scale amenity spaces for local needs throughout the development area; 13.Work with the public sector on a strategy to decontaminate the land; 14.Protect, enhance and connect to the Grand Union Canal and the existing nature reserve adjacent to it; and 15. The Brunel Road industrial estate should be retained as a Strategic Industrial Location while recognising the potential for development given its proximity to Old Oak Common Station.
Old Oak High Street Vision	Old Oak High Street will be one of the main attractions in the core development area. It will provide a key north-south route connecting Harlesden to Wormwood Scrubs and further south. It will provide direct access to Willesden Junction station, Hythe Road station and Old Oak Common station. There will be a hub of Town Centre activities along its length with a mix of amenity spaces. The canal and its surrounding amenity spaces will become a focal point for this new street. There will be a need for new infrastructure to ensure the street is fully connected into its surroundings that must achieve the highest standards for public transport, social interaction and walking and cycling.
Old Oak	Development should:

High Street Key Objectives	1. Provide a legible connection between Wormwood Scrubs and Old Oak Common station with Willesden Junction station and Harlesden Town Centre 2. Provide a street environment that is attractive for pedestrians and cyclists along its entire length. There may also be a need for vehicle movement, along either part of the street, or its full length, and these activities will need to be carefully integrated; 3. Provide clear and direct access into Old Oak Common station, Hythe Road Overground station and Willesden Junction station; 4. Deliver a mix of town centre uses typical of a busy London high street; 5. Seek to incorporate active uses (including residential entrances) along its full length of the street (where feasible); 6. Include public green spaces and public squares along its length. It should celebrate the canal as a focal point and include built in Sustainable Urban Drainage and greening measures to address drainage issues in the area; and 7. Explore opportunities for increases in building heights along the street, in recognition of its role and function as a mixed use high street.

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
There should be a western access provided to the HS2 station	1 Resident	Noted. The current design of Old Oak Common Station permitted by the HS2 (London- West Midlands) Act identifies an entrance to the west. This is reflected in policies P1 and P1C1.
Support Policy P1	Ballymore Group, Old Oak Park (DP9), Osbourne Investments Ltd (Boden House) (Savills), TfL	Noted
Is there a subtle distinction between the words 'contribute to' and 'provide' in o) and r) in the Policy i.e. 'provide' infers the development will be expected to fully fund the bridge over the canal but only part fund the delivery of other infrastructure?	Diocese of London	Noted. Contributing to the delivery of an aspect of the built environment refers to a number of stakeholders facilitating its delivery.
It may be appropriate to develop planning briefs for smaller areas once the phasing and site sub-division	Diocese of London	Noted. Policy P1C1 sets out further guidance for the Old Oak Common Station.

becomes clearer.		
Should keep the nature reserve in its current location and its biodiversity enhanced	Diocese of London, Midland Terrace Resident's Group, Old Oak Interim forum, Hammersmith and Fulham Historic Buildings Group, TITRA, 2 residents	Noted. Policy P1 seeks to enhance Birchwood Nature Reserve if retained in its current location, or reprovided in accordance with policies EU1 and EU2.
Support points j) and k) of the policy	Friends of Wormwood Scrubs	Noted
See no need for direct 24 hour access from the Old Oak Common station to the Scrubs.	Friends of Wormwood Scrubs, Old Oak Interim Forum	No change proposed. To support people accessing destinations, including Old Oak Common Station and Wormwood Scrubs legible, accessible, comfortable and 24 hour public routes to Wormwood Scrubs are identified.
In v), should change wording from 'celebrating' Wormwood Scrubs to something more controlling and binding	Friends of Wormwood Scrubs, Old Oak Interim Forum	Change proposed. Policy P1 refers to the delivery of a range of building heights including responding to Wormwood Scrubs as Metropolitan Open Land.
4.19 - The Friends of Wormwood Scrubs should be included among other key partners	Friends of Wormwood Scrubs	Noted. The supporting text to policy P12 refers to working with the Friends of Wormwood Scrubs.
Object to figure 28 showing buildings next to the northern edge of the Scrubs	Friends of Wormwood Scrubs	Change proposed. This figure is now removed from the Local Plan.
It would be more accurate to say that work is underway to assess the feasibility of a potential link from Crossrail to the West Coast Main Line as set out in the Secretary of State's announcement in August 2014.	Greater London Authority, TfL	Noted. The supporting text to P7 refers to the need safeguarding being subject to the link being feasible.
Support other wording on London Overground stations and connections in Policy P1	Greater London Authority, TfL	Noted
Should amend j) as follows to encapsulate potential built heritage interest: 'Be mindful of existing residential communities at Wells House Road, Midland Terrace/Shaftesbury Gardens, the adjacent amenity and ecological open spaces of Wormwood Scrubs and Grand Union Canal and local heritage interest.'	Historic England	Change proposed. Policy P1 has been amended to conserve and enhance the Grand Union Canal Conservation Area, ensure development is informed by the local historic character. It also requires buildings to appropriately respond to Wormwood Scrubs and existing residential areas.

In part v) suggest 'Celebrate the unique character and qualities of Wormwood Scrubs and the Grand Union Canal, including the distinctive attributes and significance of the canal and the positive contribution of the associated nature reserve ...'	Historic England	Change proposed. Policy P1 has been amended to conserve and enhance the Grand Union Canal Conservation Area.
Currently there is no certainty on the deliverability of the link described in P1 Streets p) and q). Given this HS2 believes that to be sound the draft Local Plan should recognise that the link is not certain and it would be prudent for alternative routes to be identified.	HS2 Ltd	Change proposed. Policies P1 and P1C1 have been amended to recognise that flexibility is required for delivering this route and identify additional alternative routes.
OSD feasibility is not proven so the Local Plan should acknowledge this and plan for scenarios with lower levels of OSD.	HS2 Ltd	Change proposed. Policies P1 and P1C1 have been amended to also refer to optimising development 'around' the station.
The policy should include reference to the sensitive edge along the southern edge of Old Oak South at Long Drive where it adjoins an existing residential area.	Ealing Council	Change proposed. Policies P8 and SP9 reference and depict the existing residential area along Long Drive as a sensitive location.
J) should say that the OPDC will 'resist development which impacts adversely on these longstanding residential enclaves' The same applies to P1 (k) albeit that this is more specific.	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. Policies D5 and D6 provide guidance for delivering appropriate standards of amenity for building users. Existing residential areas are identified as sensitive locations in policy SP9.
On QP1a, a more gradual approach to detailed planning this area is suggested, concentrating initially on the HS2/Crossrail interchange and its immediate surroundings.	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Change proposed. P1C1 provides further detailed guidance for Old Oak Common Station.
It seems premature to define neighbourhoods in Old Oak South at this stage, if detailed planning proposals are not likely to come forward before 2026.	Midland Terrace Resident's Group, Old Oak Interim Forum, 2 residents	Noted. The Local Plan does not define neighbourhoods in Old Oak South but includes a cluster policy for Old Oak Common Station and Old Oak Common Lane station.
A major university would be a welcome catalyst here	Midland Terrace Resident's Group, Old Oak Interim	Noted. Policy SP6 and policy TCC8 provide guidance for

	Forum	managing the delivery of catalyst uses, including higher education establishments.
Support approach to land uses in P1	Old Oak Interim Forum	Noted
Support approach to P1 l), m) and n)	Old Oak Interim Forum	Noted
On P1t) he Draft Plan gives no indication as to how 'better connections to Kensal Canalside Opportunity Area' can be achieved.	Old Oak Interim Forum	Noted. Policy SP7 and P10 identify the location of new and improved routes to Kensal Canalside within the OPDC area. OPDC will work with RBKC to ensure delivery of routes are coordinated.
Should focus on coordination of infrastructure in North Acton place rather than plan in detail the Old Oak South place	Old Oak Interim Forum	No change proposed. Policy P7 provides guidance for delivering new and improved social and transport infrastructure within North Acton.
Figure 24 on p.55 should be explicitly titled 'Illustrative Masterplan for Old Oak South'.	Old Oak Park (DP9)	Change proposed. The Local Plan appendix identifies that maps in the document are indicative.
We believe reference needs to be added to the section sub-headed 'Environment' to reflect the fact that Old Oak South could potentially facilitate the delivery of an energy centre.	Old Oak Park (DP9)	Noted. Policy P1 states the need for proposals to contribute to the delivery of infrastructure requirements set out in OPDC's Infrastructure Delivery Plan. This includes a decentralised energy network.
The Boden House site is highly suitable for redevelopment to provide a mix of uses, including town centre and employment uses, as well as residential accommodation	Osbourne Investments Ltd (Boden House) (Savills)	Change proposed. Policy P7 identifies the wider area of Acton Wells (including Boden House) for mixed-use development. This is also reflected in the site allocation for the site.
It should also be noted that the Boden House has been agreed by HS2 not to be necessary for construction works and will therefore not be acquired by HS2.	Osbourne Investments Ltd (Boden House) (Savills)	Change proposed. OPDC's Development Capacity Study (2017) reflects this by identifying the potential for the Boden House site to be developed separately from the HS2 works.
The regeneration of the Boden site would be a catalyst for the regeneration of the area	Osbourne Investments Ltd (Boden House) (Savills)	Noted.
Support indicative capacity targets for homes and jobs in P1	Osbourne Investments Ltd (Boden House) (Savills), 2 residents	Noted.

Boden House site should be identified as being appropriate for a higher density	Osbourne Investments Ltd (Boden House) (Savills)	Noted. Policy P7 does not provide site specific guidance. However, areas around North Acton Station are identified as being a potential location for tall buildings
Existing context section should reference the submission of the Oaklands application. The application should also be mentioned at 4.17 [59] in respect of development on the fringes of Old Oak South and at 4.21 [60] in respect of the area's capacity of housing and jobs.	QPR (NQP Development Services), 1 resident	Change proposed. Following granting of planning permission, delivery timescales of development across Old Oak, and adjacency to Old Oak Common Lane, Oaklands is now defined to be within the place of Old Oak Lane and Old Oak Common Lane. Policy P8 reflects the permitted scheme.
The plan for Old Oak South at Figure 24 [55] that the Oaklands site should be marked as a potential catalyst for regeneration. This is due to the fact that the application represents early delivery and regeneration in Old Oak South.	QPR (NQP Development Services)	No change proposed. Oaklands does not meet the criteria for a catalyst as set out in SP6, TCC8 and the glossary. However, it is referenced in policy P8 as an early development scheme supporting placemaking.
Reference to new connections between the Old Oak and Kensal Canalside Opportunity Areas should be made more strongly and explicitly in Policy P1(t).	Royal Borough of Kensington and Chelsea	Change proposed. Policy P10 now clearly references new and improved connections to Kensal Canalside Opportunity Area.
The Local Plan should provide further detail on the approach to the Westway industrial estate	SEGRO	Change proposed. Policy P8 now provides specific spatial guidance for the Westway Estate for land uses, building heights, connections, local heritage and phasing.
Para 4.9 should change - Old Oak South area includes potential for Old Oak Common lane station on the Northern Line rather than the West London line	TfL	Change proposed. Error corrected.
It is essential that the policy for Place P1 acknowledges the need to address the operational constraints that are created by the depot, and how the area's development responds to the site's use as	TfL	Change proposed. Policy P1 now provides guidance recognising the need to work with stakeholders to support the relocation, reconfiguration and/or development over railway

a functioning depot.		infrastructure.
Part l) should be made clearer about how a viable option can be planned for Old Oak South, having regard to the findings of the Crossrail depot study which has been carried out by TfL and reported to OPDC Board.	TfL	Change proposed. Policy P1 now provides guidance recognising the need to work with stakeholders to support the relocation, reconfiguration and/or development over railway infrastructure.
Support proposal for catalyst uses in Old Oak South	TITRA	Noted.
Object to making Wormwood Scrubs more accessible	TITRA	No change proposed. To accord with the Wormwood Scrubs Act, policy P12 seeks to improve access to the Scrubs for all Londoners through new and improved sensitive walking and cycling routes from surrounding areas.
The IEP depot could continue to be safeguarded as SIL if it is not being brought forward in the Plan period, but would this mean densities elsewhere would have to be increased? OPDC need to clearly set out the calculations for this	Residents	No change proposed. The IEP will continue to be proposed to be removed from SIL designation in accordance with policy SP5 and the policy direction set by the London Plan and Old Oak and Park Royal Opportunity Area Planning Framework.
Existing communities should be incorporated into the plans for Old Oak South and not isolated	Resident	Change proposed. Policy P1 seeks to strengthen local identity and character by ensure future character of development is informed by surrounding residential areas. Policy SP7 and T1 provide guidance for connecting existing areas.
OPDC should oversee/mitigate the impacts of what is being proposed by HS2	Resident	Noted. Following the enactment of the HS2 London-West Midlands Act, OPDC is working closely with HS2 to support the delivery of Old Oak Common Station while mitigating harm on amenity during the determination of proposals through the Schedule 17 planning regime.
Should encourage pop-up/meanwhile activities on the early development sites	Resident	Change proposed. Policy P1 by encouraging meanwhile uses across Old Oak South.

in Old Oak South		
Could potentially relocate the nature reserve, but need to maintain an area of wilderness/biodiversity in Old Oak South	2 Residents	Noted. Policy P1 seeks to enhance Birchwood Nature Reserve if retained in its current location, or reprovided in accordance with policies EU1 and EU2.
Support identification of commercial centre in Old Oak South	Resident	Noted.
Should look at More London as a good precedent for public spaces around commercial premises	2 Residents	Noted. This proposal has informed OPDC's Precedent Study.
Paddington could be a decent precedent for commercial development with supporting cafes	Resident	Noted. This proposal has informed OPDC's Precedent Study.
Criticism of Paddington as a good precedent	Resident	Noted. This proposal has informed OPDC's Precedent Study.
There is a significant drop from the Oaklands site and this needs to be considered/mitigated	Resident	Noted. The proposed movement network set out in policy SP7 accounts for level changes. This has been informed by OPDC's Public Realm, Walking and Cycling Strategy.
The Old Oak Common HS2 station lacks design quality/ OPDC needs to ensure the design is better	Hammersmith and Fulham Historic Buildings Group, 3 Residents	Noted. Policy P1C1 seeks to work with HS2 Limited to deliver an exceptional, world-class, 21st Century station inspired by the UK's and local railway history. A joint design review panel has been established between HS2 Limited and OPDC to inform the design of the station.
The link between Old Oak High Street and Hythe Road station needs to be a covered way for the winter months	Resident	No change proposed. This approach is not considered to support the delivery of a high quality movement network.
Need to show existing open spaces along Victoria Road	Resident	Change proposed. Publicly accessible open spaces along Victoria Road are shown in policy P7.
Should identify a series of neighbourhoods for Old Oak South	Hammersmith and Fulham Historic Buildings Group, 1 Resident	Noted. Policy P1 and P1C1 set out the aspiration to deliver a network of new neighbourhoods. They do not define the neighbourhoods.

		This reflects the delivery timeframes.
Support high densities around Old Oak Common station	1 Resident	Noted.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Local Plan should support the delivery of a conference/exhibition/performance facility close to Old Oak Common station	West London Line Group	No change proposed. The Local Plan supports the creation of a major town centre along Old Oak High Street and within Policy SP6, supports the potential for catalyst uses, which could include a conference/exhibition/performance facility. However, OPDC does not propose to allocate land for such a use and considers it appropriate to maintain flexibility over what catalyst uses may be appropriate in the area and judge any proposals against relevant planning policy and specifically Policy TCC8 (Catalyst Uses).
Old Oak South cannot deliver high density development with tall buildings with the current HS2 Ltd plans to naturally ventilate the station. The Local Plan cannot therefore be considered justified or effective	HS2 Ltd.	Change proposed. A decision has now been taken by DfT and HM Treasury to mechanically ventilate the station. Notwithstanding this, OPDC has undertaken more detailed development capacity modelling that has resulted in a reduced quantum being identified for the HS2 station triangle site and this change in capacity has been reflected in the Old Oak Common station and surrounds allocation.
Acknowledge that Oaklands South development delivering Park Road can help open up Old Oak North	Genesis	Change proposed. Supporting text to Policy P1 has been amended recognising the role of Park Road in providing access to Old Oak North.
Development capacity proposed on the HS2 station and surrounds is not justified. This level of development would not be supported by enabling works currently proposed by HS2. Suggest that policies are drafted more flexibly to allow for a range of development scenarios.	HS2 Ltd.	Change proposed. The capacity for the HS2 triangle site has been revised following further development capacity work to align with the proposed HS2 enabling works.

Figure 4.3 does not show Wormwood Scrubs Street, despite clear references to the delivery of this street in the policy and supporting text.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC has labelled Wormwood Scrubs Street on figure 4.3.
Disagree with the need for more than the green bridge connection between Old Oak and Wormwood Scrubs, and don't see the need for a cycling route to the Scrubs from Old Oak. Further feasibility work is required to support the entrance to Wormwood Scrubs from the bridge.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Wormwood Scrubs Act (1879) states that Wormwood Scrubs should be held “upon trust for the perpetual use thereof of the inhabitants of the metropolis for exercise and recreation”. Providing access to the Scrubs for the new residents, employees and visitors within Old Oak accords with the Act; however, any access would need to be sensitively designed to minimise its impact on the ecological value of the Scrubs and would need full agreement from the Wormwood Scrubs Charitable Trust.
Unclear on how development will "celebrate" the Scrubs.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Celebrating Wormwood Scrubs is envisaged to be delivered by the policies within the Local Plan including its conservation and enhancement.

Place policies for P1, P2 and P11 are too vague with regards to financial contributions for Harlesden Town Centre from new commercial development in the Old Oak commercial centre. Policies should clearly require that contributions will have to be secured.	London Borough of Brent, Harlesden Neighbourhood Forum	Change proposed. Policy P1(g) and supporting text have been relocated to policy TCC1.
The Elizabeth Line depot is not likely to be brought forward for the delivery of homes and jobs within the plan period. Reference to it being delivered within the plan period should be removed from the Local Plan.	Mayor of London, Transport for London (Group Planning), Transport for London (Commercial Development)	Change proposed. OPDC agrees that it is unlikely that this site will be brought forward in the Plan period. The development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan. The Old Oak South allocation has also been revised to remove the Elizabeth Line and retitled Old Oak Common station and surrounds. The Local Plan continues to support the potential for the earlier delivery of the Elizabeth Line depot during the plan period and also in the longer term.
Amend wording to reference development of business case for potential bridge connections to the north in addition to Old Oak High Street.	Transport for London (Group Planning)	Change proposed. Wording has been added to policy P1 supporting text to reflect outputs of the Old Oak North Development Framework Principles in defining connections between Old Oak South and Old Oak North.
Oaklands supports delivery of Place vision, and commencement should be acknowledged.	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	No change proposed. Following completion of the Oaklands development it will be depicted as an existing residential neighbourhood.
It is appropriate that land in Old Oak South be developed to a high density. Tall buildings will be appropriate.	Mayor of London	Noted. This is supported through policies in the Local Plan.
Consider ‘sensitively respond’ to be more appropriate than ‘appropriately responding’	London Borough of Hammersmith and Fulham	No change proposed. Existing residential areas and Wormwood Scrubs are identified in Policy SP9 to be sensitive locations. 'Appropriately responds' is consistent with the approach taken in SP9 with regards to building heights and is considered to provide sufficient policy guidance to ensure building heights respond to sensitive

		locations.
Policy is sound	Friary Park Preservation Group	Noted.
Plans should reflect the green space proposed by HS2 Ltd. between Wells House Road and Old Oak Common Station.	Joanna Betts, Nadia Samara, Nicholas Kasic, Francis, Marc and Caroline Sauzier, Patrick Munroe, Lily Gray, Wells House Road Residents Association, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that this is an important development site to optimise development capacity around the station. Development on this site is supported by HS2 Ltd, subject to it not conflicting with the effective operation of the station.
Definition for a "community hub" should be included for clarity.	Diocese of London	Noted. Reference to community hubs have been replaced to referencs to OPDC's Infrastructure Delivery Plan. This provides information for requirements for community facilities. These are defined in the glossary.
Policy is unsound	Sarah Abrahart	No change proposed. OPDC considers Policy P1 to be sound.
Policy should state that residential enclaves are not overshadowed by development that is out of scale with them or more than six storeys in height.	Nicky Guymer, Bruce Stephenson, Mark Walker, Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that the need to deliver appropriate standards of amenity for existing residential areas as being an important component in the design and delivery of development proposals. These proposals will need to be considered on a case by case basis. As such Local Plan policies SP9, D4, D5 and D6 with London Plan policies and national guidance will be used to ensure existing residential areas benefit from appropriate standards of amenity.
The Crossrail depots cannot be redeveloped and the HS2 station	Hammersmith Society, Wells	Change proposed. OPDC agrees that it is unlikely that this site will

site cannot accommodate significant capacity without being decked which HS2 do not support. Without these two issues being addressed, the Plan is unsound.	House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	be brought forward in the Plan period. The development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan. The Old Oak South allocation has also been revised to remove the Elizabeth Line and retitled Old Oak Common station and surrounds. The Local Plan continues to support the potential for the earlier delivery of the Elizabeth Line depot during the plan period and also in the longer term.
Concerns about design of planned Old Oak Common Station and provision of bus routes to the station	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC will work closely with HS2 to deliver a state of the art, exceptionally designed 21st century multi-modal transport interchange. Policy P1C1 provides guidance to inform the design of the station.
A design competition for the Old Oak Common Station should be carried out	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC will work closely with HS2 to deliver a high quality design process.
Alternative sites for a primary school should be considered.	Transport for London (Commercial Development)	No change proposed. Policy TCC4 provides a mechanism for identifying alternative primary school locations. The need for an approach which responds to

		change in development and population requirements is set out in the supporting text. As identified in Policy SP10, an equitable equalisation mechanism and retrospective pooling contribution mechanism will be used to fund the delivery of facilities.
Costs of delivering decking above the depot should be considered. Statement of Common Ground sought.	Transport for London (Commercial Development)	Change proposed. OPDC has removed the delivery of development on the Elizabeth Line depot from the Plan period. As such the consideration of the costs of decking is beyond the role of the Local Plan. OPDC will continue to work with TfL to explore deliverability of the site.
Development of sites before the Elizabeth Line Depot should not preclude its development.	Transport for London (Commercial Development)	No change proposed. Policy SP10 provides policy to ensure all development complements and does not unduly restrict development on adjacent and connected sites.
Design of Old Oak Common Station should not focus on delivering an iconic or feature standalone station to support development around the station.	Transport for London (Commercial Development)	No change proposed. OPDC considers that P1C1 Vision and Policy P1C1 provide appropriate guidance to ensure the station is integrated with surrounding areas.
Question if a specific number of jobs is required and whether these will be deliverable given uncertainty around the Crossrail depots, decking around the station and changes in the office market.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. To ensure OPDC can demonstrate the Local Plan is in general conformity with the London Plan employment target. The economic floorspace from which job figures are derived is required to be defined in accordance with NPPF paragraph 161 and NPPG guidance on Housing and Economic Land Availability Assessments. Any amendments to development capacity will be reflected in revisions to be Local Plan and related supporting evidence studies.
Support meanwhile uses in Old Oak South	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara,	Noted.

	Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
Policy should specify building heights in around Old Oak Common Station	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Old Oak Common Station and surrounding areas are identified as longer term development sites. As such, the provision of policies defining specific building heights at this point in time is not considered to be appropriate. Policy SP9 identifies this area as appropriate for tall buildings in principle but also continues to require proposals to accord with all relevant policies in national guidance, the London Plan and the Local Plan.
The rail interchange will be a focus for development but the station cannot form a heart for the development.	Regents Network	No change proposed. OPDC considers that Old Oak Common Station has the potential to be a destination at the heart of a new major town centre and commercial centre reflecting the development potential and high levels of public transport accessibility.
Figure 4.4: Kings Cross is an inappropriate precedent	Regents Network	No change proposed. OPDC considers Kings Cross to be an appropriate precedent.
Figure 4.5: More London is an inappropriate precedent	Regents Network	No change proposed. OPDC considers More London to be an appropriate precedent.
Figure 4.6: Bankside is an inappropriate precedent	Regents Network	No change proposed. OPDC considers Bankside to be an appropriate precedent.
Figure 4.7: St. Andrews, Bow is an inappropriate precedent	Regents Network	No change proposed. OPDC considers St. Andrews, Bow to be an appropriate precedent.
Figure 4.9: Rotterdam Central Station is an inappropriate precedent	Regents Network	No change proposed. OPDC considers Rotterdam Central Station to be an appropriate precedent.

Figure 4.10: St. Pancras Station is an inappropriate precedent	Regents Network	No change proposed. OPDC considers St. Pancras Station to be an appropriate precedent.
Figure4.11: Lierge-Guillemins Station is an inappropriate precedent	Regents Network	No change proposed. OOPDC considers Lierge-Guillemins Station to be an appropriate precedent.
Consultation with Friends of the Wormwood Scrubs and agreement of the Wormwood Scrubs Charitable Trust and Hammersmith and Fulham Council are essential for any proposals for the Scrubs.	TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The supporting text sets out OPDC's commitment to agreeing any proposals with the Wormwood Scrubs Charitable Trust and Hammersmith and Fulham Council and consulting with the Friends of Wormwood Scrubs.
The vision for a commercial centre on the Crossrail Depot site is not deliverable, and the site will be a blight on the canal and wider area for many years. Options for full or partial relocation should be outlined.	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC is seeking to deliver a range of projects to improve the environment and activate areas along the Grand Union Canal, including north of the Elizabeth Line Depot. This is supported by Policy TCC9 in the Local Plan. Change proposed. OPDC agrees that it is unlikely that this site will be brought forward in the Plan period. As such, the development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan. The Old Oak South allocation has also been revised to remove the Elizabeth Line and retitled Old Oak Common station and surrounds. The Local Plan continues to support the potential for the earlier delivery of the Elizabeth Line depot during the plan period and also in the longer term.
The ideas about access from the built up areas into the Wormwood Scrubs are not clearly described in the Local Plan.	Wormwood Scrubs Charitable Trust	No change proposed. The figure sets out the indicative location of new and improved access points to Wormwood Scrubs. This level

		of detail is appropriate for the role of the Local Plan.
The Trust welcomes the statement that the OPDC will agree any proposals with the Wormwood Scrubs Charitable Trust.	Wormwood Scrubs Charitable Trust	Noted.
Entrance to Old Oak Common Station should be from the east to Scrubs Lane.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is working closely with HS2 Ltd and DfT to ensure the HS2 station provides appropriate access.
Access from Old Oak Common Station to Wormwood Scrubs should not be provided.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The plan indicates a longer term access south from Old Oak station to Wormwood Scrubs to cater for demand from the south to access the station and the new amenities being delivered in Old Oak.
Gradient and design of Old Oak High Street. Retention of Elizabeth Line Depot will require a long bridge over the depot.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette	No change proposed. Connections to Old Oak North, via Old Oak Street can be achieved to the east of the depot where bridging requirements are much shorter.

	Hollender, Jeremy Aspinall, Thomas Dyton	

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
P1(d) and paragraph OOS.5. should be amended to identify B1 uses, rather than B1a.	Imperial College	Change proposed. The reference to B1a in Policy P1(d) uses reflects the proximity to the Old Oak Common Station where office floorspace is identified to be appropriate to optimise development and job densities. This is set out in OPDC's Future Employment Growth Sectors Study. Policy P2 Old Oak North supports a range of employment uses, including B1 uses.
The description of the bridge from Old Oak South to Wormwood Scrubs has been changed from Green Bridge to Bridge. Location of this bridge is important. The plan does not justify its location.	The Friends of Wormwood Scrubs	No change proposed. The change in description reflects the level of detail considered appropriate for a Local Plan. The location responds to recommendations set out in the Old Oak North Development Framework Principles based on an assessment of delivering optimum connections. The detailed design and location of this walking and cycling connection will be subject to future analysis in consultation with relevant stakeholders including the Wormwood Scrubs Charitable Trust.
Policies within the Local Plan identify that delivery of Wormwood Scrubs Street will be after the plan period and after the opening of Old Oak Common Station. The need for a long term connection from the station to Wormwood Scrubs Street is not justified. Figures show access points to the north of Wormwood Scrubs Street	The Friends of Wormwood Scrubs, The Hammersmith Society, John Cox	No change proposed. Supporting text to Policy P1 recognises that delivery of Wormwood Scrubs Street and development on the IEP Depot will take place after the plan period. The supporting text also recognises that early development of these sites will be supported. OPDC considers it appropriate to

		provide guidance for the depot should this be achieved.
Continued concerns regarding access from Old Oak Common Station to Wormwood Scrubs. Passengers of train services will not require access to Wormwood Scrubs from the station. Access should be moved to the east/centre of the site.	The Friends of Wormwood Scrubs, Thomas Dyton, Wells House Road Residents Association	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the

		requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.
The proposed green space between Wells House Road and Old Oak Common Station by HS2 should be delivered.	Thomas Dyton, Wells House Road Residents Association	No change proposed. OPDC considers that this is an important development site to optimise development capacity around the station. Development on this site is supported by HS2 Ltd, subject to it not conflicting with the effective operation of the station.
Guidance for vehicular access and accessibility is unclear.	Grand Union Alliance	No change proposed. The level of detail provided in Policy P1 for defining movement networks is appropriate for the role of a Local Plan. Policy D3 provides guidance to deliver an inclusive and accessible built environment for all sections of the community. The Old Oak North Development Framework Principles supporting study has undertaken a robust assessment of delivering a movement network at 1:20 gradient or better. Further detailed guidance will be provided in the forthcoming Old Oak North and Scrubs Lane SPD.
The Local Plan should provide a firmer commitment to delivering Wormwood Scrubs Street to Kensal Canalside in the plan period.	Royal Borough of Kensington and Chelsea	No change proposed. Wormwood Scrubs Street is currently identified to be delivered after the plan period. Figure 4.2 shows the key route of Wormwood Scrubs Street towards Kensal Canalside as a potential connection reflecting the level of work undertaken in defining its delivery. Following the completion of any future work demonstrating this

		connection, future versions of the Local Plan would reflect this accordingly.
Proposed designation of Old Oak major town centre is appropriate.	Royal Borough of Kensington and Chelsea	Noted.
Welcome delay in phasing of development of the Elizabeth Line Depot	Transport for London Commercial Development, Transport for London	Noted.
Policies should ensure sites adjacent to the Elizabeth Line Depot support its development.	Transport for London	No change proposed. Policy SP10 provides guidance for all development to be coordinated and does not unduly restrict development on adjacent and connected sites.
Support activation of frontages of the Elizabeth Line Depot but these need to support operational needs of the depot.	Transport for London	Noted. The Agent of Change principle set out in Policy D6 and Draft New London Plan Policy D12 would be implemented to support the operational needs of the depot.
Maps should show a buffer zone for lower building heights of 6-8 storeys facing on to Wormwood Scrubs.	Wormwood Scrubs Charitable Trust	No change proposed. Policy SP9 identifies Wormwood Scrubs, being an open space, as a sensitive location. The Local Plan figure 3.15 map shows sensitive locations and areas where tall buildings are “an appropriate form of development in principle”. SP9 requires development to respond appropriately to these sensitive locations. This is considered to be appropriate for the context of Wormwood Scrubs given its functions and its proximity to Old Oak Common Station. This also recognises that development along the north of Wormwood Scrubs is currently envisaged to be delivered beyond the Local Plan period (2018-2038).
The proposed character of Wormwood Scrubs Street should be provided.	Wormwood Scrubs Charitable Trust	No change proposed. Wormwood Scrubs Street is currently identified to be delivered after the plan period. Due to the street's long-term delivery, it is not considered appropriate to

		define the character of the street. This will be subject to further detailed work.
Commencement of development of Oaklands development should be referenced in the supporting text.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. The Development Capacity Study and Policy SP10 identifies that Oaklands will be delivered within the first 5 years of the plan period. It is not considered appropriate for the Local Plan to refer to the commencement of development.
Delay in development of Elizabeth Line Depot will impact on placemaking and delivery of a commercial centre in Old Oak South.	London Borough of Hammersmith and Fulham	No change proposed. The development capacity from the Elizabeth Line has been removed from the homes and jobs targets in the Local Plan reflecting updated availability information provided by landowners. Policy P1 continues to seek to deliver a commercial centre. The Local Plan continues to support the potential for the earlier delivery of the Elizabeth Line depot during the plan period and also in the longer term. Policies SP7, P1 and P2 provide guidance to deliver Old Oak Street to connect Old Oak Common Station with surrounding areas. To support placemaking Policy P1 supports activation of the frontages of the depot and delivery of meanwhile uses.
Support reference to delivering Local Parks. Other publicly accessible open spaces should also be referenced.	London Borough of Hammersmith and Fulham	No change proposed. Policy SP8 and supporting text to Policy P1 refer to a range of publicly accessible open spaces as part of the green infrastructure network.
P1 should clarify that direct access to Wormwood Scrubs will not be provided. Technology could assist people viewing nature on Wormwood Scrubs	Wormwood Scrubs Charitable Trust	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3:

		Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.
Publicly accessible open spaces should include green infrastructure. Benefits of green infrastructure should	London Borough of Hammersmith and Fulham	No change proposed. Policy SP2 sets out the benefits of green infrastructure. Policy EU2 sets out guidance to

be stated. Management plans should be agreed with the boroughs.		deliver urban greening. Supporting text to EU1 refers to the need for consultation with the relevant local authority on all management and maintenance arrangements for publicly accessible open spaces that they may adopt in the future.
Requirements for sports infrastructure should be referenced in Place Policies.	Sport England	No change proposed. Sport facilities are identified as social infrastructure within the Local Plan. SP4 provides strategic guidance to deliver sport facilities to meet the requirements of the development. Due to the long term development phasing and the need to ensure the Local Plan can respond to changing needs over the lifetime of the plan, the Infrastructure Delivery Plan sets out the detailed requirements for sports infrastructure. However, to provide transparency regarding currently identified need for sports facilities, supporting text to Place policies P1 and P2 provide information relating to the delivery of sports infrastructure.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 350 in Old Oak South. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 15,200 in Old Oak South. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in

	a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations
Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including: • 5 broad historic themes: o Grand Union Canal; o Rail heritage; o Industrial heritage; o Residential enclaves; and o Scrubland and open space. • a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets. • heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.
Retail and Leisure Needs Study	• There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years). • A new town centre hierarchy is identified: - A new major town centre at in Old Oak; - A new neighbourhood town centre at North Acton; - A new neighbourhood town centre at Atlas Junction; and - Consolidating and expanding the existing neighbourhood town centre at Park Royal Centre. • Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for

	independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal. This includes four key routes in Old Oak. These are: Old Oak High Street, Grand Union Street, Park Road and Wormwood Scrubs Street.
Old Oak North Development Framework Principles	Provide a walking and cycling connection from Old Oak Street to Wormwood Scrubs via a high quality bridge.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal. This includes four key routes in Old Oak. These are: Old Oak High Street, Grand Union Street, Park Road and Wormwood Scrubs Street.	This recommendation has been superseded by the key route network recommended by the Old Oak North Development Framework Principles.

Other evidence base

Supporting Study	Recommendations
	• None

P1C1. Old Oak Common Station

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Old Oak Common Station Vision	Old Oak Common Station will be a new state of the art public transport interchange that will serve communities at Old Oak, Park Royal, London and the wider UK. It will incorporate the highest standards of architecture and will be designed to connect seamlessly into its surroundings with the station and track potentially accommodating over station development. It will become a beating heart with the opportunity to perform a comparable regenerative impetus to that of the recently improved Kings Cross station.
Old Oak Common Station Key Objectives	1. Create a destination of exceptional quality and form an integral part of the public realm, connecting into its surroundings in all directions; 2. Be of outstanding architectural quality, rivalling the finest stations in the world such as the redeveloped Kings Cross and St. Pancras stations; 3. Secure connections to Wormwood Scrubs including a legible and direct ungated access through the station in order that people can move seamlessly through the station, as well as exploring other opportunities for connections to the Scrubs from Old Oak South; 4. Provide a variety of active town centre uses that caters for residents, employees, and passengers; 5. Provide new public arrival spaces that will act as a focal point for the entire

	area; 6. Be supported by a mixed development including commercial, retail and residential uses; 7. Support over station, and over track, development, where feasible, to optimise development capacity preferably in the form of new development or new decked amenity space; and 8. Provide a state of the art public transport interchange, which would easily facilitate the movement of pedestrian, cyclists and passengers from buses, taxis and (a small number of) cars into and from the station and be well integrated into the public realm.

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Regulation 18 Local Plan did not include cluster policies.		

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
An additional level should be created above ground in the Old Oak Common station to connect in local rail services	West London Line Group	No change proposed. This option was explored as part of Grip 2 work for the London Overground stations. Due to high cost and impact on services, this option is not supported by TfL, DfT or HS2 and OPDC does not propose to safeguard land for this option in the Local Plan.
The Local Plan should specify the amount of structural foundations required within the Old Oak Common station	West London Line Group	No change proposed. Structural foundations are not a planning matter, being governed bu Building Regulations and in any case, for Old Oak Common Station are a matter for the London - West Midlands Act 2017.
Old Oak Common station policy should support enhanced access to and from the OPDC area and facilitate the widest possible range of journey options	West London Line Group	No change proposed. The need for the Old Oak Common station to deliver excellent local, regional and national connections is referenced in the Vision for Old Oak South. The importance of the connectivity brought by the

		station is also referenced in the Spatial Vision and Policy SP1.
Para OOC.7 should clarify that the 250,000 passengers figure is per day. Question this assumption as it may not include population assumptions from Old Oak and Park Royal and evidence shows that historic estimates of interchange numbers underestimate.	West London Line Group	Change proposed. Wording has been inserted to clarify that the 250,000 passenger figure is per day.
Time period for station demand figures needs to be clarified.	Transport for London (Group Planning)	Change proposed. It is appropriate to provide clarity regarding the year modelling had been carried out and the supporting text has been amended.
Policy diagrams for Old Oak South Place are unsound. Policy diagrams should reflect both end-state aspirations and HS2's currently committed Act scheme.	HS2 Ltd.	Change proposed. OPDC has amended the figure to show a diagram depicting HS2's currently committed scheme within the High Speed Rail (London - West Midlands) Act 2017 scheme for 2026 to demonstrate how the area will change.
Public open spaces and station squares should promote natural green landscaping, trees etc. rather than swathes of hard surfacing. Tree lined routes can help promote legibility. Maintenance and management plans, materials for public realm improvements must be agreed with the Boroughs.	London Borough of Hammersmith and Fulham	Noted. The supporting text identifies that the Old Oak South Local Park will comprise a number of connected spaces ranging from hard landscaped station stations with civic functions to green pocket parks. Noted. Policy EU2 provides guidance for urban greening. Change proposed. Maintenance and management plans for open spaces and materials should be consulted with the relevant borough where appropriate. This requirement has been added to relevant policies.
Old Oak Common Station needs to carefully design to provide ample cycle parking.	London Borough of Hammersmith and Fulham	Noted. OPDC will work closely with HS2 to ensure sufficient provision of cycle parking.
Development needs to take	London Borough of	Noted. Policies SP9, D2, D4,

into account quality and appearance.	Hammersmith and Fulham	D5, London Plan policies and national guidance will be used to delivery high quality design of development.
The HS2 Station design (internal) and surrounds (external area) must address and support the growth in population; the regeneration ambitions of the Local Plan which will connect the station to surrounding stations.	London Borough of Hammersmith and Fulham	Noted. OPDC will work closely with HS2, DfT and TfL to ensure Old Oak Common Station supports the increase in population and is well connected to other stations. Policies SP7, P1, P1C1 and P2 provide this guidance in the Local Plan.
There are doubts that Old Oak Common Station will be built.	Friary Park Preservation Group	Noted. The enactment of the High Speed Rail (London - West Midlands) Act 2017 confirms that HS2 will be delivered. Site works are now underway.
Policy is sound	Diocese of London	Noted.
Policies requiring transport infrastructure, namely the HS2 station, to support planned growth in the OPDC area are unsound. The policies would require works to cater for additional station capacity outside of HS2's scope as set out in the Act. For the policies to be sound they should accurately reflect HS2's set scope for station capacity and be more flexible on aspirations for future capacity.	HS2 Ltd.	No change proposed. The policy is considered to provide sufficient reference to the HS2 Act and flexibility to accommodate future capacity.

Regulation 19(2) consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Old Oak Common Station is being designated to accommodate forecast Rail plan Scenario 28 passenger demands. Any changes to this would require instruction from DfT and additional funding. Town centre uses within and around the station will be delivered in accordance with the High	HS2 Ltd.	Noted. TfL modelling information has been provided in paragraph OOC.7 to illustrate interchange with other modes. Policy P1C1 confirms OPDC will work positively with stakeholders to deliver Old Oak Common Station in accordance with the High Speed Rail Act.

Speed Rail Act 2017.		
A 24 hour east west route across the station will be considered. The station will not be accessible 24 hours a day.	HS2 Ltd.	Noted. Policy P1C1 provides guidance for 24 hour public routes through the station. These will be delivered in accordance with the High Speed Rail Act 2017.
Support for high density development. Policy should be clear in optimising housing delivery at stations.	Transport for London Commercial Development	Noted. Policy P1C1 provides guidance focused on Old Oak Common Station. Policy P1 provides guidance for wider Old Oak South, including development plots adjacent to the station. This seeks to create a high density place with substantial quantum's of residential and commercial development. Supporting text to Policy SP9 identifies that in locations of high public transport accessibility, high densities are appropriate. Policy SP10 seeks to optimise development. OPDC considers these policies to accord with the aspirations of the Draft New London Plan to optimise development.
Policy should be amended to acknowledge the importance of bus services.	Transport for London	No change proposed. The need to deliver a high quality bus network is acknowledged in Policy T6. Policy P1C1 and supporting text make reference to the need to deliver transport interchange facilities which would include bus services.
Welcome reference to green infrastructure	London Borough of Hammersmith and Fulham	Noted.
Old Oak Common Station should pioneer smart city concepts.	London Borough of Hammersmith and Fulham	Noted. Policy T4 provides guidance to ensure all stations future proof station designed to facilitate future technological changes.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 350 in Old Oak South.

	• Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 15,200 in Old Oak South. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations
Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including: • 5 broad historic themes: o Grand Union Canal; o Rail heritage; o Industrial heritage; o Residential enclaves; and o Scrubland and open space. • a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets. • heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.
Retail and Leisure Needs Study	• There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years).

	• A new town centre hierarchy is identified: - A new major town centre at Old Oak High Street; - A new neighbourhood town centre at North Acton; - A new neighbourhood town centre at Atlas Junction; and - Consolidating and expanding the existing neighbourhood town centre at Park Royal Centre. • Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal. This includes providing access to the station in accordance with the HS2 London-West Midlands Act scheme and aspirational connections to the east and west.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	**N/A**	N/A

Other evidence base

Supporting Study	Recommendations
	• None

P2. Old Oak North

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Old Oak North Vision	Development will be residential-led creating a new Lifetime Neighbourhood. The area will also need to include a level of commercial space focussed around activating Old Oak High Street, Willesden Junction and the Grand Union Canal as key destinations. This area will accommodate a much smaller number of jobs than Old Oak South, which will be the focus for new commercial space. The area requires significant new transport and utility infrastructure to ensure that it is both accessible and operational. Old Oak North will need to include a network of new streets and amenity spaces that meet the needs of all residents along with the provision of a sufficient level of new social infrastructure. Allongside the delivery of a new Hythe Road station, this area presents a fantastic opportunity for early delivery of homes and jobs. As part of this there could be a role for small and large scale catalyst uses to help create a destination and a place.
Old Oak North Key Objectives	1. Early delivery of new homes and infrastructure to encourage the regeneration of the wider area; 2. Development will be residential-led and will make a significant contribution to the overall housing target for the area; 3. Potential for small and large-scale catalyst uses such as a new

	educational facility, sports stadium, sports complex, health, arts, leisure and or cultural centre; 4. New and improved public transport connections, including a new Overground station at Hythe Road and improvements to Willesden Junction station; 5. A new and improved street network, permeable and attractive for social interaction, walking and cycling, providing better connections to the surrounding area including; an accessible bridge of at least 12 metres wide over the West Coast Mainline connecting the EMR site to Willesden Junction, new and improved connections to Scrubs Lane, and new connections over the Grand Union Canal; and 6. Significant provision of new amenity and leisure spaces, connected by a legible and coherent street network: 7. Development should be mindful of existing residential communities in Harlesden, Island Triangle and along Scrubs Lane: and 8. Work with the public sector on a strategy to decontaminate the land.
Old Oak High Street Vision	Old Oak High Street will be one of the main attractions in the core development area. It will provide a key north-south route connecting Harlesden to Wormwood Scrubs and further south. It will provide direct access to Willesden Junction station, Hythe Road station and Old Oak Common station. There will be a hub of Town Centre activities along its length with a mix of amenity spaces. The canal and its surrounding amenity spaces will become a focal point for this new street. There will be a need for new infrastructure to ensure the street is fully connected into its surroundings that must achieve the highest standards for public transport, social interaction and walking and cycling.
Old Oak High Street Key Objectives	Development should: 1. Provide a legible connection between Wormwood Scrubs and Old Oak Common station with Willesden Junction station and Harlesden Town Centre 2. Provide a street environment that is attractive for pedestrians and cyclists along its entire length. There may also be a need for vehicle movement, along either part of the street, or its full length, and these activities will need to be carefully integrated; 3. Provide clear and direct access into Old Oak Common station, Hythe Road Overground station and Willesden Junction station; 4. Deliver a mix of town centre uses typical of a busy London high street; 5. Seek to incorporate active uses (including residential entrances) along its full length of the street (where feasible); 6. Include public green spaces and public squares along its length. It should celebrate the canal as a focal point and include built in Sustainable Urban Drainage and greening measures to address drainage issues in the area; and 7. Explore opportunities for increases in building heights along the street, in recognition of its role and function as a mixed use high street.

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Hythe Road area currently houses an estimated 250-300 spaces for creatives/artists/makers. This cluster should be recognised in the Local Plan and steps taken to protect it.	Old Oak Interim Forum, 4 residents	Change proposed. Policy P2 refers to the need to support the existing creative uses floorspace in accordance with policy E1.
Would object to any direct or indirect reference to the potential for a sports stadium in Old Oak North.	Old Oak Park (DP9)	Noted. Policies SP9 and TCC8 provide guidance for managing a range of catalyst uses.
Need improved connectivity/permeability across Old Oak North, prioritising different modes and to alleviate strain on existing roads.	Resident	Noted. Policies SP7 and P2 set out the proposed movement network for the area and how these integrate with surrounding streets for a range of transport modes.
Need to set clear guidance for development in and around Willesden Junction station	Brent Council	Change proposed. Policies P11 and P11C1 now provide specific guidance for Willesden Junction Station.
There is scope to develop above the railway lines at Willesden Junction, which as significant advantages in terms of supporting the achievement of housing and employment targets and providing connections to the north	Brent Council, 3 residents	Change proposed. Policy P11 recognises the potential for over station and track development by working positively with stakeholders to support the relocation, reconfiguration and/or development, over and around, existing and future railway infrastructure.
Pedestrian and cycle walkways from Willesden Junction into Old Oak North need to be of the highest quality and can remain in use when new streets are built	Brent Council, 1 resident	Change proposed. Policy P11 seeks to deliver new and improvement movement routes to Old Oak North across all phases of development, including Old Oak High Street.
The Local Plan currently omits an important connection throughout from Willesden Junction to the east to Harrow Road and Harlesden. Figure 29 needs amending	Brent Council, 2 residents	Change proposed. Policy P11 and supporting figures now depict connections to Harrow Road and Harlesden.
Should state railway lines to the ‘east with Scrubs Lane beyond’, rather than west.	Brent Council	Change proposed. Policy P11 now refers to connections to the east and west of Willesden Junction Station.

Typo – 'a mix of town centre and catalyst uses,' rather than 'a mix of town centres.'	Brent Council	Noted.
The vision needs to emphasise the retail offer in Old Oak North is to serve the new population, and make specific reference to complementing the offer at Harlesden Town centre.	Brent Council	Change proposed. Policy P11 requires proposals to contribute to the delivery of Old Oak High Street as part of a major town centre by delivering a range of permanent town centre uses that meet needs of employees, residents and interchange passengers. It also requires the submission of a Harlesden Enhancement Strategy to support the functioning of Harlesden town centre.
Figure 29 should make it clearer where development around Willesden Junction station can be provided	Brent Council	Change proposed. All diagrams supporting place policies are indicative. Figures supporting policy P11 identify potential broad locations for development.
Should be ambitious in terms of the design of the bridge over the West Coast Main Line	Brent Council	Noted. Policy SP7 sets out the need for Old Oak High Street, including the bridge, to be of a high quality.
It's assumed the boundary to the north of Willesden Junction is identified as a sensitive edge but this is not clear in Figure 29.	Brent Council, 1 resident	Change proposed. Figures supporting policy P11 depict the existing residential area to the north as a sensitive location. SP9 also depicts these as a sensitive location.
Development should be required to improve connections to the station both in the short, medium and long term.	Brent Council	Change proposed. Policy P11 now sets out the aspiration for early delivery of routes from Willesden Junction to surrounding areas.
The policy should require development to facilitate the delivery of bus, cycle and pedestrian routes throughout the development.	Brent Council	Noted. Policies SP7 and P2 set out the proposed movement network for the area and how these integrate with surrounding streets for a range of transport modes.
Old Oak North is within an area of open space deficiency; therefore it is essential the policy specifies the quantum of open space needed to provide sufficient access to the new community.	Brent Council	Change proposed. Policy P2 requires proposals to contribute to the delivery of one full and one partial Local Park and a range of smaller open spaces within Old Oak North.

New bridge over the West Coast Main Line should be vehicular and incorporate a bus route	Brent Council, QPR (NQP Development Services), 1 resident	Noted. Policy SP7 identifies that Old Oak High Street, including the bridge, delivers high quality routes for walking, cycling and where feasible buses and other vehicles.
A large open space is required to address need. Larger open spaces allow for a wider range of recreational and sporting activities, and thus promote both mental and physical health and well-being.	Brent Council, Hammersmith and Fulham Council, Hammersmith and Fulham Historic Buildings Group, 3 residents	Change proposed. Policy P2 requires proposals to contribute to the delivery of one full and one partial Local Park and a range of smaller open spaces within Old Oak North.
Development should provide a continuous walking and cycling route along the north side of the canal	Brent Council, Diocese of London, Old Oak Park (DP9), Hammersmith and Fulham Historic Buildings Group, 5 residents	Change proposed. Policy P3 requires development to contribute to the delivery of a continuous walking and cycling route along the north of the canal within Old Oak.
Bridging over the West Coast Main Line would increase the development capacity of the area	Brent Council, Ealing Council	Noted.
Support the Local Listing of Car Giant, 44-45 Hythe Rd, London NW10 6RJ (the former Rolls Royce Motors building of 1939).	Brent Council, Canal and River Trust, Hammersmith and Fulham Historic Buildings Group, Diocese of London, Historic England, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Noted. This information will be used to inform the proposed local list. The local list will be consulted on in due course, alongside the progression of the Local Plan.
Need to be more specific about where employment uses should be located in Old Oak North	Brent Council	Change proposed. Policy P2 identifies that employment uses should be delivered across Old Oak, including B1a and B1b along Old Oak High Street, a mix of B1 uses within and around the Rolls Royce Building and where high levels of residential amenity cannot be achieved.
Need to consider amenity of residential uses close to employment uses in Old Oak North	Brent Council	Change proposed. The supporting text of policy P2 identifies the need for employment uses to mitigate impacts on residential amenity within mixed use development.
Support Policy P2	Diocese of London, Old Oak Interim Forum, Old Oak Park (DP9), Hammersmith and Fulham Historic Buildings	Noted.

	Group, 1 resident	
Support identification of potential for catalyst uses in Old Oak North	Farrells, Old Oak Park (DP9), QPR (NQP Development Services), TITRA, 1 resident	Noted.
Support improved connections between Willesden Junction and Harlesden	Brent Council, Harlesden Neighbourhood Forum, 1 resident	Noted.
The Metroline Depot site is important to the future of Harlesden	Harlesden Neighbourhood Forum	Noted. Policies P8 and E1 continue to designate the depot as SIL while requiring development to provide active frontages on to Station Road and positive frontages on to Harley Road to help enhance the surrounding public realm.
Support Old Oak North being identified as an early phase of development	Harlesden Neighbourhood Forum	Noted.
Should make more specific reference to the setting of Kensal Green Cemetery and other highly graded heritage assets in the policy	Harlesden Neighbourhood Forum	Change proposed. Policy P2 seeks to conserve and enhance existing and proposed heritage assets, including the setting of the Grade 1 Listed Registered Park and Garden Kensal Green Cemetery.
Wording of 4.34 is not sufficiently clear in relation to appropriateness of tall buildings.	Historic England	Change proposed. Policy P2 provides indicative guidance for the location of tall buildings within Old Oak North and a height range along the Grand Union Canal reflecting its heritage and environmental designations.
The Policy should be amended should be amended to encompass the historic environment more clearly	Historic England	Change proposed. Policy P2 now includes a specific section on heritage and character.
Should identify the potential for the railway embankment in Old Oak North to be converted to a viaduct	Ealing Council, Hammersmith and Fulham Historic Buildings Group	Change proposed. Policy P2C1 identifies the potential for the railway embankment to be delivered as a viaduct if proven to be feasible.
Support provision of SME space in Old Oak North	Ealing Council, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Noted. This approach is continued in policy P2 and policy E3.
Should not show development on Powerday site if safeguarded	Ealing Council	Change proposed. Figures supporting P2 now identify the safeguarding of the Old

		Oak Sidings waste management site.
Support potential for catalyst uses in the place	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. This approach is continued in policy P2.
Support potential for a series of linked open spaces in Old Oak North rather than one large open space	Midland Terrace Resident's Group, Old Oak Interim Forum, 2 residents	Noted. Policy P2 requires proposals to contribute to the delivery of two Local Parks and a range of smaller open spaces.
Concerned that lower densities proposed by Cargiant might result in densities being increased elsewhere	Midland Terrace Resident's Group	Noted.
Support vision for P2	Old Oak Interim Forum, Old Oak Park (DP9)	Noted. The aspirations of the previous vision are continued within the amended vision for Old Oak North.
Welcome not segregating sites into residential and/or employment zones	Old Oak Interim Forum	Noted.
P2v) should make reference to open space and children's play requirements	Old Oak Interim Forum	Noted. Policy P2 and EU1 require proposals to contribute to the delivery of one full and one partial Local Park, a range of smaller open spaces and green streets within Old Oak North. Policy D9 provides guidance for the delivery of play space alongside London Plan guidance.
Para 4.46 should refer to Old Oak North rather than Old Oak South	Old Oak Interim Forum	Noted. This paragraph has been removed.
Identifying smaller neighbourhoods in Old Oak North is unnecessarily prescriptive at this stage	Old Oak Interim Forum, Old Oak Park (DP9)	Noted. Policy P2 and P2C1 set out the aspiration to deliver a network of new neighbourhoods. They do not define the neighbourhoods. This reflects the delivery timeframes.
Do not propose any sites in Old Oak North having site specific policies	Old Oak Interim Forum, Old Oak Park (DP9)	No change proposed. Policies P2 and P2C1 set out spatial guidance at a range of scales to support the delivery of Lifetime Neighbourhoods. Site allocations are provided to demonstrate delivery of new homes and economic floorspace.

Figure 29 should be titled 'illustrative masterplan for Old Oak North	Old Oak Park (DP9)	Change proposed. The Local Plan appendix identifies that maps in the document are indicative.
B1 (b) and B1 (c) at locations adjacent to transport and/or utilities infrastructure' is too prescriptive and unnecessary considering the inclusion of the requirement in the policy also to 'provide a range of flexible workspace typologies for B1 uses'.	Old Oak Park (DP9)	Change proposed. Policy P2 now requires proposals to deliver B1 uses at locations where high levels of residential amenity are not able to be achieved.
preferred policy wording to state 'where feasible, development proposals should seek to incorporate a range of temporary and meanwhile uses.' rather than specifying that early uses should be flexible open workspaces	Old Oak Park (DP9)	Change proposed. Policy P2 now requires proposals to deliver a range of active meanwhile uses across Old Oak North.
additional flexibility needs to be added to points g) and h) of the preferred policy option to reflect the fact that the distribution of densities and building heights in the area will be more appropriately determined as proposals come forward	Old Oak Park (DP9)	Change proposed. Policy P2 now requires proposals contribute to the delivery of a network of high density neighbourhoods at a variety of building heights. This includes tall buildings in defined broad locations and lower heights adjacent to the Grand Union Canal.
supportive of the flexibility provided in the preferred policy wording and in supporting paragraph 4.40 that new public open space in Old Oak North 'could be formed of one larger space or a series of good sized but smaller spaces across the area'	Old Oak Park (DP9)	Noted. Policy P2 requires proposals to contribute to the delivery of one full and one partial Local Park and a range of smaller open spaces within Old Oak North.
Do not think that the Local Plan should seek to specify whether the new park is to be provided as one large space or as a series of linked new spaces across Old Oak North	Old Oak Park (DP9)	No change proposed. Policy P2 requires proposals to contribute to the delivery of one full and one partial Local Park and a range of smaller open spaces within Old Oak North.
Justification text should recognise that catalyst uses may enable high density development	QPR (NQP Development Services)	No change proposed. Supporting text recognises the role of a range of catalyst uses in helping activate Old Oak North and inform local

		identity.
The role of the EMR site in facilitating of early delivery of high-density development should be recognised.	QPR (NQP Development Services)	No change proposed. The development of EMR site will be subject to the relocation of the active waste use and agreement with Network Rail regarding the removal of relevant rail freight safeguarding.
Densities should be lower near the canal and existing residential areas	2 Residents	Change proposed. Policy P2 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes.
Support improvements to Willesden Junction station	Resident	Noted.
Should retain the existing footbridge over the West Coast Main Line as it is used by trainspotters	Resident	No change proposed. To facilitate the delivery of Old Oak High Street over the West Coast Main Line the existing footbridge will likely be removed.
Support improved access to Old Oak North from the east	Resident	Noted. Policies SP7, P2 and P10 provide guidance for new and improved connections from Scrubs Lane into Old Oak North.
Support Cargiant proposals	Resident	Noted.
Support residential led development in Old Oak North	Resident	Noted.
Support relocation of European Metal Recycling (EMR)	Resident	Noted.
Support for through traffic in Old Oak North as it would help with safety and surveillance	Resident	Noted. Policies SP7, P2, P7, P8 and P10 provide guidance for new and improved connections across Old Oak North. However, through traffic is envisaged to be limited to public transport.
Support for smaller series of neighbourhoods in Old Oak North	Diocese of London, 4 Residents	Noted. Policy P2 and P2C1 set out the aspiration to deliver a network of new neighbourhoods. They do not define the neighbourhoods. This reflects the delivery timeframes.
Willesden Junction main station entrance should be maintained in its current location rather than it being	Resident	No change proposed. Policies P11 and P11C1 provide guidance for improving Willesden Junction

altered and Harlesden residents being given a 'back door' entrance		Station and surrounding areas to deliver high quality access from areas in the north including Harlesden.
Development should be lower density around Willesden Junction station	Resident	No change proposed. Policy P11 requires proposals to deliver a range of building heights including tall buildings over and around Willesden Junction Station reflecting the high levels of public transport access and generally lower heights adjacent to Tubbs Road reflecting the area being identified as a sensitive location.
Like the current design of Willesden Junction station	Resident	Noted.
Support indicative capacity targets for homes and jobs in P2	2 Residents	Noted. Development capacity figures have been updated in light of amendments to OPDC's Development Capacity Study (2017).
Should not retain any buildings in Old Oak North as part of a heritage led approach	Resident	No change proposed. Policy P2 provides guidance to conserve and enhance existing and proposed heritage assets while ensuring future local character is informed by local heritage.
Support approach to land uses in P2	Resident	Noted.
Should locally list the loading bay units in Salter Street, maybe as performance space or a café. The electricity tower by the railway, some of the artists' studio buildings. The dark red building of c 1890 by the canal (we have seen an internal view and it has an interesting roof structure, might make a good sports facility	Hammersmith and Fulham Historic Buildings Group	Noted. This information will be used to inform the proposed local list. The local list will be consulted on in due course alongside the progression of the Local Plan.

Regulation 19(1) consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Should make use of West	West London Line Group	Noted. Old Oak North

London Line viaduct space for town centre uses		Development Framework Principles recommends the delivery of a viaduct and delivery of town centre uses around the potential Hythe Road Station. This is reflected in the policy.
Construction of an initial phase of Old Oak High Street truncated by the canal and Crossrail depot will not encourage early activation in Old Oak North.	The Inland Waterways Association-Middlesex Branch	No change proposed. Old Oak North Development Framework Principles demonstrates that connections from Scrubs Lane, Old Oak Common Lane via key routes will support early activation of Old Oak North.
Town centre uses at Grand Union Square and other major canal crossings should be restricted to facilitate the new Local Park.	The Inland Waterways Association-Middlesex Branch	No change proposed. OPDC considers that retail, leisure and community uses have the potential to complement and support activiation of the proposed Grand Union Canal Local Park.
Policy should reference benefits of early delivery of new bridge link to Willesden Junction Station.	Queens Park Rangers Football Club and Stadium Capital Developments	Noted. OPDC considers Policy P2 provides sufficient guidance for the delivery of new connections to Willesden Junction that reflects current phasing of development.
Careful consideration should be given to the environment created by the Old Oak Sidings Waste Site and impacts on residential development. Policy should go further in supporting health and well being to mitigate the impact on existing waste management sites on residential areas.	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis, Victoria Hollertz, TITRA, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The requirement for new or enhanced waste sites to minimise environmental impacts is covered in Policy EU6.
Policy should acknowledge that EMR site could come forward earlier than currently envisaged.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Policy DI2 provides guidance that ensures all development proposals are brought forward as early as possible.
Policy should state that tall buildings may be appropriate near to the bridge leading to Willesden Junction Station.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. OPDC considers that Policy P2 provides sufficient guidance for the location of tall buildings in Old Oak North based on evidence base.

Smaller residential units do not need to be focussed around the small business hub.	Old Oak Park Limited	Change proposed. Policies relating to the location of smaller units have been removed from policy P2.
Reprovision of creative businesses (in terms of quantum, type or reprovision of businesses) is not appropriate. Rolls Royce Building should not be identified to have the opportunity to deliver space for meanwhile uses.	Old Oak Park Limited	No change proposed. Policy E2 provides guidance for the reprovision of existing businesses outside of SIL. The Rolls Royce Building is proposed to be Locally Listed and the envisaged retention in the short/medium would place this as an appropriate location for meanwhile uses.
Level of detail on meanwhile uses is inappropriate. Suggested that this is removed	Old Oak Park Limited	Change proposed. Detailed guidance for meanwhile uses has been removed to avoid repetition with Policy TCC9.
Northern viaduct solution for Hythe Road Station will make the sustainable drainage solution difficult to achieve	Old Oak Park Limited	No change proposed. OPDC considers Policy EU3 provides an appropriate framework to inform site specific interventions to deliver sustainable drainage infrastructure appropriate to the role of a Local Plan.
Greater clarity required about locally listed buildings in OON	Old Oak Park Limited	Noted. OPDC has consulted separately on its proposed local heritage listings.
Greater clarity required on whether development in OON should deliver or facilitate the walking/cycling bridge to Wormwood Scrubs	Old Oak Park Limited	No change proposed. Policy P2 provides information regarding retrospective pooling contributions
The level of detail provided in the policy is beyond what should be included in a Local Plan and would be more appropriately addressed through a masterplan planning application	Old Oak Park Limited	No change proposed. OPDC considers the level of detail provided is appropriate.
Support for delivery of 5000 new jobs and 2400 new homes in first 10 years	Fruition Properties	Noted.
The large waste sites need to be encouraged to move on at the earliest opportunity.	Victoria Hollertz	No change proposed. Old Oak Sidings waste site is required to meet Hammersmith and Fulham's waste appointment targets for the London Plan period. The site also has the potential to support the management of waste during the construction of Old Oak

		and contribute to a district heating/energy network. As such, the Old Oak Sidings waste site is safeguarded for the Local Plan period.
Support OON11 and OON12 and activation of Old Oak High Street.	Victoria Hollertz	Noted.
Support OON18 and target for new green space.	Victoria Hollertz	Noted.
Support OON24 and protecting heritage.	Victoria Hollertz	Noted.
There is concern that the policy commitment to the inclusion of energy from waste is premature given that no assessments of the requirements of such a proposal or the potential impacts has been carried out or included as part of the Local Plan consultation.	London Borough of Hammersmith and Fulham	No change proposed. The policy does not commit to delivering energy from waste. Any use would need to comply with OPDC's air quality policy and other material planning considerations. OPDC has undertaken a study looking at the air quality impacts from Energy from Waste at Old Oak Sidings and this supports the Local Plan.
There is no mention of OPDC's plans to relocate the EMR waste management site in Policy P2 and EU6. The safeguarded status of the Old Oak Sidings (Powerday) site should also be included.	London Borough of Hammersmith and Fulham	No change proposed. Policy P2 safeguards Old Oak Sidings for waste management and apportionment purposes. The loss of EMR as a waste site would be managed through the policy requirements set out in EU6.
OON.8, OON.12, OON.19 Areas inappropriate for housing would also be appropriate for artist space; artists' workspaces during the development stages could be very beneficial to the OPDC; Arts Centre Space offering workshops etc. could be included to feed into the community leisure, activity and social needs.	ArtWest	Noted. Employment floorspace referenced includes artist space. Policy TCC9 sets out guidance to support meanwhile uses.
Development should be encouraged to retain parts of the Rolls Royce Building and / or canalside warehouses for reuse by creative uses.	Hammersmith and Fulham Historic Buildings Group, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	Noted. Policy D8 and P2 provide guidance for conserving and enhancing existing locally listed buildings including Rolls Royce Building and adjacent canalside engineering works. NPPF paragraph 126

	Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	provides guidance for the viable reuse of heritage assets.
Supportive of Cargiant reducing densities and proposing to retain the Rolls Royce building.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Without a commitment to the delivery of Hythe Road Station, the densities in Old Oak North are unjustified resulting in the policy being ineffective.	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Development capacities and densities for Old Oak North are informed by a range of elements including existing and planned transport capacity. This includes improvements to existing stations and proposed new stations such as Old Oak Common Station and Hythe Road Station. The Public Transport Accessibility Levels generated by Old Oak Common Station, improvements to Willesden Junction Station and existing/planned bus routes supports the development capacity identified for Old Oak North without solely relying on improved public transport access generated by Hythe Road Station. The policy supports the delivery of the highest public transport levels to support density of development.
Support proposed Hythe Road Overground station, subject to it allowing for retention of artists' studios	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
The housing targets or Old Oak North (Policy P2) appear	Old Oak Interim Neighbourhood Forum, Wells	No change proposed. Residential development

more realistic and acceptable having been reduced by a third by the landowners from their original proposals. Welcome OPDC amending homes target to reflect Cargiant's figures but this has resulted in an increased target for Scrubs Lane.	House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	capacity along Scrubs Lane has been identified using National Planning Practice Guidance Housing and Economic Land Availability Assessment guidance based on the Scrubs Lane Development Framework Principles capacity assessment.
Support the delivery of the viaduct option within Old Oak North.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Strongly support reprovision of creative business space but E1 will not ensure that this is re-provided at realistic rent levels for artists.	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The employment policies support the reprovision of existing employment floorspace, including creative business space. Supporting text to E2 sets out the approach to ensure reprovided floorspace is affordable. This would also include creative business space.
Figure 4.13: Elephant Park is an inappropriate precedent	Regents Network	No change proposed. OPDC considers Elephant Park to be an appropriate precedent.
Figure 4.14: City Island is an inappropriate precedent	Regents Network	No change proposed. OPDC considers City Island to be an appropriate precedent.
Figure 4.15: Barking Town Centre is an inappropriate precedent	Regents Network	No change proposed. OPDC considers Barking Town Centre to be an appropriate precedent.
Figure 4.16: Handyside Park, Kings Cross is an inappropriate precedent	Regents Network	No change proposed. OPDC considers Handyside Park to be an appropriate precedent.
Figure 4.19: Granary Square, Kings Cross is an inappropriate precedent	Regents Network	No change proposed. OPDC considers Granary Square, Kings Cross to be an appropriate precedent.
Figure 4.20: The Grand Canal Square, Dublin is an inappropriate precedent	Regents Network	No change proposed. OPDC considers the Grand Canal Square to be an appropriate precedent.

It is appropriate that land in Old Oak North be developed to a high density. Tall buildings will be appropriate.	Mayor of London	Noted. This is supported through policies in the Local Plan.
Policy is overly prescriptive in identifying where there should be greater concentrations of family and smaller units. It should be dealt with through the masterplanning application	Old Oak Park Limited	Change proposed. Policies relating to the location of family sized units and smaller units have been removed from policy P2.
Support Policy P2l in broad terms	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

Regulation 19(2) consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Figure 4.7 should show Old Oak Street connecting to Willesden Junction Station.	London Borough of Brent	Change proposed. Figure 3.10 depicts Old Oak Street connecting to Willesden Junction Station. Figure 4.7 seeks to show the continuation of Old Oak Street north of Park Road as a walking and cycling route due to the complexities in delivering this key route for all modes. This is also referenced in paragraph OON.14. To assist in clarifying the continuation of Old Oak Street as a walking and cycling route to Willesden Junction, Figure 4.7 and other relevant diagrams will be amended to show Old Oak Street as a walking and cycling route more clearly.
The role of Harlesden Place should be clarified.	London Borough of Brent	No change proposed. The role of Harlesden Place as part of the Old Oak North Local Park is set out in

		paragraph OON.10 at a level of detail appropriate to a Local Plan. Further guidance on its role will be set out in the future Old Oak North and Scrubs Lane SPD based on recommendations in the Old Oak North Development Framework Principles supporting study.
Seek clarification on the definition of a Mixed Use Area (in the east) and how this differs from a Major Town Centre (in the west) in Old Oak North. Also encourage recognition of the potential for a station at Hythe Road to contribute towards the Major Town Centre, and flexibility on the application of these designations within Old Oak North.	Old Oak Park Limited	Noted. The mixed use reference relates to a range of uses including residential, town centre, employment and social infrastructure. This includes the major town centre proposed for Old Oak North and South. Guidance for these areas are set out in SP5, SP6 and TCC1. Change proposed. Paragraph OON.6 will be amended to make reference to the potential Hythe Road Station contributing to the vibrancy of Old Oak major town centre.
Strong opposition to the safeguarding and expansion of Old Oak Sidings (Powerday) waste management facility due to the existing and potential negative impact on local amenity. Request alternative waste management site to be found.	TITRA, Nye Jones, Gail Dobinson, Catherine Goodall, Rachel Ritfeld, Ciara Solmi, Bruce Stevenson, Eileen Walsh, Teresa De La Rosa, Oonagh Heron, Bernie Timmins, Thomas Dyton, Jane Dreaper, M. Szoke, James Trew, Stephanie Hewett, Eileen Hannington, Alison Brayshaw, Marta Donaghey, Jamie Sutcliffe, Pablo Navarrete, Stuart McCaffer, Pendle Harte, Jason alkely, Elaine Gristock, David Turner, Nicky Guymer, Environment Agency, Midland Terrace Residents	Noted. The Mayor's London Plan requires Local Plans to identify land/facilities to meet waste apportionment targets, and expects this to include protecting and facilitating the maximum use of existing waste sites. Powerday is required to meet LBHF's waste apportionment targets and therefore it will continue to be protected as a waste management site. The other waste sites in the Plan have been identified as safeguarded sites in the adopted West London Waste Plan. These sites provide certainty that waste apportionment targets in Brent and Ealing can be met through the implementation of the WLWP. OPDC is not responsible for issuing waste permits or regulating waste management sites; these responsibilities are

		undertaken by the Environment Agency or the boroughs' Environmental Health departments. A range of policies within the Local Plan and London Plan will be implemented to ensure that new development would not cause unacceptable harm to the amenity of existing uses. The Local Plan policies include SP9, D6, EU4, EU5, EU6, P2 and P8.
Figure 4.7 and Policy P2 are inconsistent regarding the route of Old Oak Street. Harlesden Place is not recognised within the green infrastructure section of Policy P2.	London Borough of Brent	Change proposed. Supporting text to Policy P1 identifies that Old Oak Street crosses Harlesden Place to Willesden Junction Station as a walking and cycling route. To ensure figure 4.7 reflects information provided in the supporting text to policy P1, the walking and cycling route will be labelled as Old Oak Street. No change proposed. Harlesden Place and Oak Park comprise the Old Oak North Local Park which is labelled in figure 4.7. Policy P2 provides guidance for Old Oak North Local Park. Further detail for Harlesden Place is provided in the Old Oak North Development Framework Principles document which will inform the forthcoming Old Oak North and Scrubs Lane SPD.
Minimum development quantums have been reduced. Site is considered to have additional development capacity.	Old Oak Park Limited	Noted. Table 3.1 identifies that housing and commercial floorspace targets are minimums.
Concern expressed regarding location and alignment of some roads, amount of open space and relationship between development plots and the embankment within the Old	Old Oak Park Limited	Noted. The Local Plan illustrates indicative locations of streets, Local Parks and position of the proposed West London Line viaduct. The forthcoming Old Oak North and Scrubs Lane SPD

Oak North Development Framework Principles.		will provide further detailed indicative guidance for the location of these elements.
Support for viaduct option	Old Oak Park Limited	Noted.
Guidance for the location of B1c uses along the Haul Road is too detailed.	Old Oak Park Limited	No change proposed. The Old Oak North Development Framework Principles has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. This identifies that the Haul Road is appropriate for B1c uses reflecting it's transport role and access to the wider movement network.
Delivering 30% publicly accessible open space is a challenge.	Old Oak Park Limited	No change proposed. The evidence collected suggests that 30%, which equates to 4.1m2 per person across Old Oak is modest. This has been benchmarked against other large-scale regeneration projects in London in order to derive an appropriate target. By comparison, the average across the LBHF is 13 m2 per person. Evidence collected by the GLA suggests that providing open and accessible space within 400ms of homes, close to schools and along safe routes significantly increases the amount of time people spend in parks, helps to improve healthy outcomes and can contribute to better air quality, SuDS, and quality of place.
Removal of location specific guidance for family and smaller housing is not supported. Text should be reinserted.	John Cox, Grand Union Alliance	No change proposed. The removal of this guidance is considered to be appropriate to provide flexibility for location of different residential unit sizes. Policy H3 provides guidance for the range of home sizes to be provided.
Walking and cycling route across Old Oak North Local Park must be safe. Exact boundary of the Old	John Cox, Grand Union Alliance	Noted. Policy D2 provides guidance to deliver a safe and secure public realm. Noted. Local Plan Appendix

Oak North Local Park is unclear.		identifies that figures in the Local Plan are indicative. It is not the role of the Local Plan to define the exact boundary of the Old Oak North Local Park.
Old Oak Street should be renamed reflecting its route. Station Approach does not need renaming.	John Cox	Noted. Old Oak Street has been named for the purposes of the Local Plan. In the long-term development of the area, other names will be considered. Station Approach is not proposed to be renamed.
The London Environment Strategy states that Energy from Waste facilities are not required to manage municipal waste. The Local Plan should clarify its policy on Energy from Waste.	Mayor of London	Noted. The Utilities Study has assessed options and sets out further detail on the approach and assessment of energy sources for the strategic district heating network. The heat source for an area wide network is yet to be determined. Energy from waste has the potential to be a viable low carbon heat source but there are other potential secondary heat sources that have been investigated, including ground source heat pumps and heat recovery from the Grand Union Canal. The policy does not identify potential waste streams which is considered to provide appropriate flexibility to be in general conformity with the London Plan and to be consistent with the latest approach set out in the London Environment Strategy regarding the use of municipal waste for Energy from Waste facilities. A range of policies within the Local Plan and London Plan will be implemented to ensure that new development, including facilities for a decentralised energy network, would not cause unacceptable harm to the amenity of existing uses. The Local Plan policies

		include SP9, D6, EU4, EU5, EU6, P2 and P8.
P2 should refer to "heritage canalside warehouses"	Hammersmith Society	No change proposed. These warehouses are proposed to be identified as Buildings of Local Heritage Interest that will clarify their status as non-designated heritage assets. Non-designated heritage assets are referenced in policy SP9 and policy D8.
Support for delivery of the potential Hythe Road Station and West London Line viaduct.	Transport for London	Noted.
Further work will be required to develop the design of the potential Hythe Road Station. This will require engagement between OPDC, TfL and stakeholders.	Transport for London	Noted. The Local Plan provides strategic guidance for the design of stations. This will be implemented in the detailed design of stations in consultation with relevant stakeholders.
Supporting text to Policy P2 should set out that if Hythe Road Station is not delivered, alternative approaches to delivering public transport improvements will be sought.	Transport for London	No change proposed. Policy P2(g) provides guidance to achieve the highest PTAL to support high density development. Paragraph OON.12 provides information in relation to delivering a range of public transport services to deliver high PTAL levels.
Support for Park Road being delivered as access only.	Transport for London	Noted.
Delivery of Hythe Road London Overground Station is not confirmed. This is required to support densities and the need of development.	Midland Terrace Residents, St. Quintin and Woodlands Neighbourhood Forum	Noted. TfL supports the preferred option of a viaduct and potential new station at Hythe Road. The benefits of this solution have been demonstrated through TfL's business case work and the public consultation carried out in autumn 2017 showed significant public support for the proposals. The Overground station at Old Hythe Road is planned to be delivered by 2026 to coincide with the opening of Old Oak Common station. OPDC is currently working with partners including HS2, Network Rail and TfL to confirm a funding package

		for the station. Development capacities and densities for Old Oak North are informed by a range of elements including existing and planned transport capacity. This includes improvements to existing stations and proposed new stations such as Old Oak Common Station. The Public Transport Accessibility Levels generated by Old Oak Common Station, improvements to Willesden Junction Station and existing/planned bus routes supports the development capacity identified for Old Oak North without solely relying on improved public transport access provided by Hythe Road Station. The policy supports the delivery of the highest public transport levels to support density of development.
Removal of requirements for green infrastructure along streets and minimising impacts on sewer network weakens the policy.	Environment Agency	No change proposed. The National Planning Practice Guidance states that Local Plans should avoid undue repetition. These components were removed to avoid repetition with policies EU2 and EU3.
Policy should emphasise that the provision of a new bridge link between the Station and the regeneration area to the south, landing in the European Metals Recycling (EMR) site, will improve PTAL.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. The supporting text to Policy P2 adequately sets out the benefits of a bridge link to Willesden Junction to PTAL.
Publicly accessible open spaces should include green infrastructure. Benefits of green infrastructure should be stated. Management plans should be agreed with the boroughs.	London Borough of Hammersmith and Fulham	Noted. Policy SP2 sets out the benefits of green infrastructure. Policy EU2 sets out guidance to deliver urban greening. Supporting text to EU1 refers to the need for consultation with the relevant local authority on all management and maintenance arrangements

		for publicly accessible open spaces that they may adopt in the future.
Welcome support of new multifunctional waterspaces	London Borough of Hammersmith and Fulham	Noted.
Policy P2 should be amended to address amenity issues.	London Borough of Hammersmith and Fulham	No change proposed. Guidance to design development to address pollution and urban heat island effects are set out in policies EU1, EU2 and EU4.
Policy should provide reference to Policy D7.	London Borough of Hammersmith and Fulham	No change proposed. All relevant policies in the Local Plan will be used to determine proposals. As such, a specific reference to policy D7 is not required.
Supporting text to P2 should refer to nursery provision rather than one super nursery. This should also apply to policies P1 and TCC4.	London Borough of Hammersmith and Fulham	No change proposed. The need for supernurseries is based on a robust assessment of need. The typology is consider to be the most efficient and viable based on existing information and discussions with operators. Should market conditions change, future versions of the Local Plan will be updated.
Hythe Road Station should be referred to as proposed rather than potential.	London Borough of Hammersmith and Fulham	No change proposed. The term potential is considered to be appropriate to reflect the current status of proposals for the station.
The Grand Union Canal Food and Beverage Quarter should be restricted to clusters of activity along the canal.	London Borough of Hammersmith and Fulham	No change proposed. Policy P3 seeks to activate the Grand Union Canal. Therefore, restricting the Food and Beverage Quarter to clusters of activity is not considered to be appropriate.
Support safeguarding of Old Oak Sidings waste facility	London Borough of Hammersmith and Fulham	Noted.
Policy P2 does not reference the need for compensatory provision, set out policy EU6, for the waste capacity of the EMR site.	London Borough of Hammersmith and Fulham	No change proposed. Policy EU6 would be implemented to manage the loss of the waste function on the EMR site.
Building heights are overwhelming.	Grand Union Alliance	No change proposed. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and

		environment of the OPDC area and will be supported where they accord with the relevant development plan policies. OPDC's Tall Building Statement provides information supporting this approach. Policy D5 sets out guidance for delivering high quality tall buildings with SP9 and place policies providing guidance for their locations. Policies D6 and P8 provide guidance to ensure new development does not cause unacceptable harm to the amenity of existing uses.
Buildings around Local Parks may negatively impact their amenity.	Grand Union Alliance	No change proposed. High quality tall buildings and high density development at appropriate locations will be a component element of the built character and environment of the OPDC area and will be supported where they accord with the relevant development plan policies. Policies EU1 and D6 provide guidance to ensure the delivery of appropriate standards of amenity for publicly accessible open spaces.
The Local Plan does not provide adequate connections to Harlesden town centre.	Grand Union Alliance	No change proposed. The Local Plan recognises the importance of connecting with surrounding areas, including Harlesden. Policies SP7, T6 and Place Policies P2, P8, P10 and P10 set out guidance to connect Harlesden through bus services, walking and cycling to Old Oak.
Delivering Park Road as access only will increase traffic in Harlesden. A new vehicular route is required. Delay of development of Elizabeth Line Depot does not result in legible connections to Old Oak North. Impacts on the wider	Grand Union Alliance, Diocese of London, Harlesden Neighbourhood Forum	No change proposed. Park Road is identified to be appropriate for all modes of transport aside from private vehicles. This includes taxis and bus services. The Old Oak Strategic Transport Study and Park Royal Transport Strategy have assessed the impacts of

movement network have not been considered.		development which can be mitigated through a range of highways and policy interventions. Policy T1 provides guidance to ensure that the impacts on the surrounding local and strategic road network are mitigated. No change proposed. The Old Oak North Development Framework Principles has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. The consultants undertook a robust assessment of the technical constraints of Old Oak North, Willesden Junction and the required retention of the Elizabeth Line Depot to identify deliverable connections to surrounding areas. This work has shown that delivering an all modes route north of Park Road to Harlesden is very challenging at the time of the publication of the Local Plan. Therefore the Local Plan proposes it to be a high quality walking and cycling route to ensure a strong connection to Harlesden. The work has also successfully demonstrated that Old Oak Street as a legible connection can be delivered with a retained depot to connect Old Oak North and Old Oak South. To support placemaking Policy P1 supports activation of the frontages of the depot and delivery of meanwhile uses.
Warehousing adjacent to the Rolls Royce Building would be retained for active uses.	Grand Union Alliance	Noted. Conservation and enhancement of this proposed non-designated asset will be considered in accordance with Policy D8 and other relevant policies and material considerations.

Removal of Policy P2C1 is not supported	John Cox, Grand Union Alliance	No change proposed. The removal of P2C1 has been carried out to reflect the change in character resulting from relocation of Old Oak Street away from Grand Union Square and avoid repetition with policies elsewhere in the plan.
Removal of Policy P2C1 is supported	Old Oak Park Limited	Noted.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Old Oak North Development Framework Principles	• Deliver a viaduct for the West London Line to generate wider benefits. • Delivery of 6,500 new homes and 3,600 new jobs within the Plan Period. • Delivery and phasing of development to reflect updated location of key routes of Park Road and Old Oak Street. • Provide connections to Scrubs Lane that should be located at Park Road and Hythe Road. • Provide connections to Old Oak South via Park Road and Old Oak Street. • Delivery connections infrastructure to enable access. • Delivery of a two-way cycle lane to the west of Scrubs Lane is no longer likely to be deliverable. • Within the place of Willesden Junction, Old Oak Street will continue as a walking and cycling route connecting to Station Approach in the west. To the east a new walking and cycling link will also be delivered to Harrow Road. • Defines locations for town centre uses aligned to reflect new street hierarchy. • Deliver decreased amounts of employment floorspace reflecting demand and viability considerations. • Defines new locations and format of publicly accessible open space. • Deliver a new utilities network. • Defines 8-12 storey shoulder heights for development, tall buildings to be appropriate across the area (subject to other development plan policies and material considerations) and preferred locations for tall buildings to reflect location of active land uses and to support legibility.
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.

Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations
Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including: • 5 broad historic themes: o Grand Union Canal; o Rail heritage; o Industrial heritage; o Residential enclaves; and o Scrubland and open space. • a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets. • heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.
Retail and Leisure Needs Study (and addendums)	• There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years). • A new town centre hierarchy is identified: - A new major town centre at Old Oak High Street; - A new neighbourhood town centre at North Acton; - A new neighbourhood town centre at Atlas Junction; and - Consolidating and expanding the existing neighbourhood town

	centre at Park Royal Centre. • Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal. This includes four key routes in Old Oak. These are: Old Oak High Street, Grand Union Street, Park Road and Wormwood Scrubs Street.	This recommendation has been superseded by the key route network recommended by the Old Oak North Development Framework Principles.
Retail and Leisure Needs Study (and addendums)	• A new town centre hierarchy is identified: - A new major town centre at Old Oak High Street;	A major town centre continues to be recommended within Old Oak. However, the changes to the key routes and phasing means Old Oak High Street has been replaced with Old Oak Street with town centre uses distributed across Old Oak North.

Other evidence base

Supporting Study	Recommendations
	• None

P3. Grand Union Canal

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the

	Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.
PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Grand Union Canal Vision	Within Old Oak the Grand Union Canal will be central to creating a new place. It will be a diverse and well used space. The built environment created along the canal should look to other regeneration schemes examples such as Battlebridge Basin near King's Cross for guidance. Development should enable easy east-west movement on both sides of the canal and should also allow views, and access, to the canal from land to the north and south. To achieve this there will need to be close working with the Canal and River Trust. This should include preparation of a deliverable bridge crossing strategy in discussion with landowners. The canal should become a place of interest for residents and visitors. It should be fronted by high quality buildings, with some opportunities at key destinations for higher densities and active uses. The canal edge should include a series of connected open spaces that allow people the opportunity to enjoy this place. Within Old Oak it is also important that development enables the easy use of the canal for movement of people and freight.

	Within Park Royal the canal should play an important commercial role for business. There are opportunities to use the canal for transport and freight. The Mayor and OPDC will work to encourage this. There may also be a need for additional crossings along with ecological enhancements. The southern canal side tow path should be maintained and continued for use as an important east-west route for pedestrians and cyclists. Access to both sides of the canal edge should be promoted. However, it is unlikely that a new fully accessible tow path would be deliverable on the northern side of the canal.
Grand Union Canal Key Objective	Within Old Oak 1. New development along the canal should be mixed use including residential, with some opportunities for retail and leisure uses located near to main streets and other key destinations; 2. New development should recognise the canal's conservation area designation and its sensitive and historic character; 3. In general new buildings should be more restrained in height then at transport nodes, but there will be opportunities for some high quality, high density development at key destinations along the canal; 4. There is an opportunity to bring additional water into the core development area, and new water spaces, such as basins, should be explored where feasible; 5. Opportunities for new residential and visitor moorings would be supported in appropriate locations that do not adversely impact on the delivery of the core regeneration area around Old Oak or the navigational function of the canal; 6. New development should support the delivery of new bridges over the canal to improve connectivity and to achieve this a bridge a strategy will need to be prepared and agreed with the Canals and River Trust and landowners; and 7. The tow path on the southern side of the canal should be retained and improved, whilst on the northern side new access, and views, to the canal should be secured to allow east-west movement within the core development area. Within Park Royal 8. New development should seek to activate the canal edge where appropriate and viable; 9. New connections to the canal should be provided to improve access; 10. The southern canal side tow path should be retained and improved and should help deliver the requirements of a cycle Quiet Way. 11. New and improved lighting and signage should be delivered and balanced with biodiversity aspirations; 12. New development should provide an appropriate sense of enclosure to the canal and explore the potential for buildings to be set back from the canal edge; 13.Biodiversity and flood mitigation improvements will be supported where these do not have an adverse effect on navigation. Opportunities to use canal water for the heating and cool of buildings will be explored within major developments situated adjacent to the canal. 14. New and improved accessible local public amenity spaces should be provided; 15. Development of new passenger and freight transport facilities will be supported in appropriate locations, where it can be demonstrated that such

	facilities are viable. Opportunities for temporary wharves during the demolition and construction should be explored

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

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

workspaces and artists) and long term moorings including educational and festival opportunities		commercial and permanent moorings. Supporting text refers to educational and cultural mooring uses.
Define potential for new basins or additional waterspace for moorings north of the canal	Canal & River Trust, The Hammersmith Society, The Inland Waterways Association, Local residents, Hammersmith and Fulham Historic Buildings Group	Change proposed. Policy P3 supports the delivery of multifunctional new basins and waterspaces.
Support for towpath as Quietway	Canal & River Trust	Noted.
Acknowledge that the towpath is an important part of the canal infrastructure	Canal & River Trust	Change proposed. Supporting text to P3 acknowledges the tow path as important part of the canal infrastructure.
Do not generally support off-side walkways, but can see that it would be beneficial here	Canal & River Trust	Noted. Policy P3 requires proposals to contribute to the delivery of a continuous walking and cycling route along the north of the canal within Old Oak North.
Provide more detail of towpath lighting	Canal & River Trust	No change proposed. Detailed guidance for lighting is considered to be beyond the scope of the Local Plan.
Lighting should be provided	Local community representative, local resident	Change proposed. Support for appropriate lighting is provided in policy P3.
Define current surface water flooding issues experienced along the canal's length as this is currently not known to be an issue	Canal & River Trust	Change proposed. This information is set out in the supporting text to policy P3.
Definition of smaller neighbourhoods to be discussed with OPDC	Canal & River Trust	Noted. Policies P1 and P2 set out the aspiration to deliver a network of new neighbourhoods. They do not define the neighbourhoods. This reflects the delivery timeframes.
Need to consider microclimate impacts of overshadowing on the canal	Canal & River Trust	Noted. Policy D6 provides guidance for protecting amenity of spaces. Policy P3 and EU1 provides guidance for protecting and enhancing the biodiversity value of the canal.
Include a wider photo than figure 37	Canal & River Trust	Change proposed. This figure has been removed from the Local Plan.
Community uses should be included as suitable town	Diocese of London	Noted. The glossary defines social infrastructure as a

centre use		town centre use.
The canal can be made into a major and well used feature in the Old Oak/Park Royal area.	Grand Union Alliance, local community representatives, local business, Hammersmith and Fulham Historic Buildings Group	Noted. Policy P3 seeks to deliver this aspiration.
Provide canal development precedents	Historic England	Change proposed. OPDC's Precedent Study (2017) provides canalside precedents. This information has informed the development of policy P3.
Concerns regarding the intention to 'transform' the canal in light of it being a Conservation Area.	Historic England	Change proposed. Reference to 'transform' has been removed.
Vision does not align with policy wording in light of it being a Conservation Area. Suggested wording: 'The character and appearance of the Grand Union Canal Conservation Area will be explored through a conservation area appraisal. This will seek to ensure that proposals preserve and enhance its character and appearance.'	Historic England	Change proposed. The vision has been amended to better reflect the existing and future conservation areas along the length of the Grand Union Canal.
Tall building locations - policy needs to be informed by more detailed evidence base. Setting of heritage assets is key.	Historic England	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
Illustration - p73 does not suggest good canalside design in terms of urban grain and character	Historic England	Change proposed. This figure has been removed from the Local Plan.
Relationship of public realm and edges to canal is critical.	Historic England	Noted. Policy P3 provides guidance reflecting this.
Consider using design codes for features along the canal including bridges and lighting	Historic England	Noted. Policy P3 provides guidance for lighting and bridges appropriate to the role of a Local Plan.

Should implement Conservation Areas along its entire length.	LB Ealing, Local resident	Noted. OPDC's Heritage Strategy proposes the delivery of a single conservation area along the length of the Grand Union Canal. This will be progressed in 2018.
Need development in Old Oak to achieve a coherent urban scale.	LB Ealing	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal.
Need to improve environmental quality of the canal	LB Ealing, TITRA, local community representative, local residents	Change proposed. Policies EU2, EU3 and P3 seek to enhance the environmental quality and roles of the Grand Union Canal.
Support for walking and cycling route along the north and south of the canal	Midland Terrace Residents Group, Old Oak Interim Forum, The Hammersmith Society, TITRA, Local resident	Noted.
Concerns regarding impact of high densities along the canal	Midland Terrace Residents Group, Old Oak Interim Forum, TITRA	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting amenity and local legibility to enable people to reach destinations along the canal.
Proposed density is higher than cited examples.	Midland Terrace Residents Group	Noted. OPDC has undertaken a Grand Union Canal Massing and Enclosure Statement to inform the appropriate approach to densities and building heights along the canal.
The overall approach set out for the preferred policy option is broadly supported. Sub-paragraph f) could be used	Midland Terrace Residents Group	Change proposed. OPDC's Precedent Study (2017) provides canalside precedents. This information

as justification for additional building height.		has informed the development of policy P3.
A series of small-scale neighbourhoods could be identified, including Atlas Road and Mitre Bridge hubs.	Midland Terrace Residents Group, Old Oak Interim Forum, The Inland Waterways Association, TITRA, Local residents, local community representative	Change proposed. Policies P8C1 and P10C4 provide guidance for the delivery of clusters at these locations.
Higher densities than those proposed could be delivered	Local residents	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
Higher densities than those proposed should not be delivered	Midland Terrace Residents Group, Old Oak Interim Forum, The Inland Waterways Association, local resident, Hammersmith and Fulham Historic Buildings Group	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
Wish to be considered as key stakeholders	National Bargee Travellers Association	Noted.
Suggest that existing character definition includes boaters without a home mooring	National Bargee Travellers Association	Change proposed. The Local Plan glossary has been updated.
Boaters should be referenced in the place vision.	National Bargee Travellers Association	Change proposed. The vision has been amended to refer to existing moorings.
Amend policy to include: a. Support the delivery of land uses which are related to the canal and canal users such as wharfs, boatyards, workshops, chandleries and related facilities.	National Bargee Travellers Association	Change proposed. Policy P3 now supports canal related land uses.

Amend policy to include: b. Contribute to the retention and improvement of the towpath for casual moorings recognising that this can enhance security in the area.	National Bargee Travellers Association	Change proposed. Policy P3 supports a range of permanent and temporary new residential, leisure and visitor moorings and their supporting infrastructure.
Amend policy to include: c. Consider the views of canal users, including boater groups and conservation groups, and to work to address their concerns.	National Bargee Travellers Association	Change proposed. Supporting text to P3 now refers to boating associations and canal users as stakeholders to inform the delivery of the vision.
Suggest that the phrase 'casual moorings' would be more inclusive than 'visitor moorings' as it would more clearly apply to all canal users.	National Bargee Travellers Association	Change proposed. Casual moorings are referred to in supporting text to P3.
Define how moorings would adversely impact on the regeneration of the wider area	National Bargee Travellers Association	Change proposed. Relevant wording has been removed from the Local Plan.
Suggest policy is amended as: "New development will be required to support the delivery of residential and casual moorings and related facilities in locations that do not impact on the navigational function of the canal".	National Bargee Travellers Association	Change proposed. Relevant wording has been removed from the Local Plan.
Refer to 'local boater groups'	National Bargee Travellers Association	Change proposed. Supporting text to P3 now refers to boating associations and canal users as stakeholders to inform the delivery of the vision.
Character of the canal is likely to be lost with neighbouring development	Old Oak Interim Forum, TITRA, local community representative	No change proposed. Policy P3 seeks to strengthen the local identity and character of the canal.
Consistent approach to public realm design required	Old Oak Interim Forum	Noted. Policy D2 requires the delivery of the public realm to be coordinated.
Cited precedents reliant on industrial heritage buildings	Old Oak Interim Forum	Change proposed. OPDC's Precedent Study (2017) provides canalside precedents. This information has informed the development of policy P3.
Concerns regarding relative density ranges	Old Oak Interim Forum	Change proposed. SP9 identifies the canal as a sensitive location, requiring

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

		and improved canalside walking and cycling routes.
Canal can provide a waterside green corridor, with leisure and sporting activities and an attractive environment for new homes to be built near the canal.	The Hammersmith Society	Noted. These aspirations are embedded within the vision for the canal.
Historic buildings should be retained and reused.	The Hammersmith Society, TITRA, Local resident	Change proposed. Policy P3 seeks to converse and enhance the conservation area and locally listed buildings as well as ensuring the use of a high quality palette of materials to enhance the historic character.
Vision for canal in Park Royal lacks ambition	The Inland Waterways Association	Change proposed. Vision has been amended.
Figure does not accord with policy aspirations	The Inland Waterways Association	Change proposed. This figure has been removed from the Local Plan.
More clarity on building heights required	TITRA	Change proposed. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
Birchwood nature reserve should be retained	Local resident	Noted. Policy P1 seeks to enhance Birchwood Nature Reserve if retained in its current location, or reprovided in accordance with policies EU1 and EU2.
Meanwhile uses should be supported	Local resident	Change proposed. Policy P3 supports meanwhile uses along the canal.
Towpath on southern side	Local community representative	Noted
Utilities under tow path	Local resident	Noted.
Concerns regarding land ownerships complicating improvements and that OPDC could purchase land	Local community representative, local resident	Noted. Policy P3 refers to the need for close working with the Canal and River Trust.

alongside the canal		
Positive role of The Collective on the canal	Local community representative	Noted.
Mitre Tavern should be rebuilt	Local community representative	Noted. Policy P10C4 seeks to deliver canalside leisure uses within the Mitre Canalside cluster.
Tow path width should be increased and / or buildings set back from the canal	Local residents	Noted. Policy P3 provides guidance for delivering a shared walking and cycling route along the towpath of 3.5 metres where feasible. There may be locations on the north of the canal where buildings delivered directly on to the canal are appropriate to reflect the historic canalside character.
Access routes should be provided a regular intervals	LB Brent, local resident	Change proposed. Policy P3 sets out the locations of new and improved connections along the canal.
Car parking for the canal should be provided	Local community representative	No change proposed. This would not accord with the proposed car parking standards set out in policy T4.
Car parking for the canal should not be provided	Local resident	Noted.
Cycle parking on the canal will provide safety issues	LB Brent	Noted. Policy P3 provides guidance for delivering a shared walking and cycling route along the towpath of 3.5 metres where feasible to support walking and cycling.
Connections from the canal to Wormwood Scrubs	Local community representative	Noted. A number of new sensitive walking and cycling connections to Wormwood Scrubs are proposed in policy P12 and P1.
Segregated cycle lanes should be explored	Local community representative, local resident	Noted. Policy P3 provides guidance for delivering a shared walking and cycling route reflecting the role and constraints of the towpath.
Support for tow path as a walking and cycling route	Local residents	Noted. Policy P3 provides guidance for delivering a shared walking and cycling route along the towpath of 3.5 metres where feasible to support walking and cycling.
More open spaces should be provided along the canal	Local residents	Change proposed. Policy P3 requires proposals to

		contribute to the delivery of a Local Park along the canal and a range of smaller connected canalside open spaces.
Objection to identifying smaller areas	Local resident	Noted.
Support for a stadium use	Local residents	Noted. Policies SP6 and TCC8 provide guidance for the location and type of catalyst uses across the OPDC area.
Varied styles of buildings should be provided	Hammersmith and Fulham Historic Buildings Group	Noted. Policy P3 requires proposals to deliver generally 6-8 storeys on to the canal with opportunities for taller buildings at crossings of major routes. This approach seeks to provide appropriate enclosure to the canal while supporting local legibility to enable people to reach destinations along the canal. This is supported by the Grand Union Canal Massing and Enclosure Statement.
The Canal and River Trust should be involved in pre-application discussions on schemes that would result in an impact on the Grand Union Canal	Canal and River Trust	Noted. Policy P3 refers to the need for close working with the Canal and River Trust. This includes in pre-application discussions.
Need to provide space for residential canal moorings	2 Residents	Noted. Policy P3 supports residential moorings
Support measures for the protection and enhancement of biodiversity along the canal, where this does not obstruct navigation	Canal and River Trust	Change proposed. Policy P3 seeks to protect and enhance the biodiversity value of the canal in accordance with policy EU2.
The canal warrants particular attention in EU8 and P4 and to cover biodiversity, access, building heights, bridges and cycling and pedestrian routes on the canal tow path, basins, side docks and wharfs.	Grand Union Alliance	Noted. Policy P3 provides guidance for these elements.
Some wild areas should be maintained along the canal	Resident	Noted. This level of detail is beyond the scope of the Local Plan. However, policy P3 seeks to enhance the environmental quality and role of the canal.
Should support canalside	Midland Terrace Resident's	Change proposed. Policy P3

restaurants and artists' markets	Group, Old Oak Interim Forum	supports town centre uses, including markets and leisure uses, along the canal.
Boating and canoeing should be introduced on the Grand Union Canal	The Hammersmith Society	Change proposed. Policy P3 supports canal related uses on the canal.
Should provide facilities for canal users	Hammersmith and Fulham Historic Buildings Group	Noted. Policy P3 supports the delivery of canal related infrastructure.
Support the retention of the open space between the railways to the south of Wells House Road	Hammersmith and Fulham Historic Buildings Group	Noted. This space is required to support the delivery of Old Oak Common Station. OPDC will work with HS2 Limited to explore its long term use.
There are a number of Victorian industrial buildings along the northern edge of the canal in Old Oak North that merit protection	Canal and River Trust, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Noted. This information will be used to inform the proposed local list. The local list will be consulted on and adopted alongside the progression of the Local Plan.
There is currently a conflict between pedestrians and cyclists on the towpath in Old Oak and this needs to be resolved	Resident	Noted. Policy P3 provides guidance for delivering a shared walking and cycling route along the towpath of 3.5 metres where feasible to support walking and cycling.
Policy should require that buildings do not cast a shadow on the canal	1 Resident	No change proposed. The Local Plan requires development to contribute to a variety of building heights that respond to the canal's heritage, character, biodiversity and amenity function by delivering heights and massing that support the functioning, designations, amenity and character of the canal. However, it does not set a firm rule that no shadow can be cast on the canal. This is not consistent with the general character of the canal.

Regulation 19(1) consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Broadly support the proposed approach to the Grand Union Canal	Canal and River Trust	Noted.
Canal River Trust are	Regents Network	No change proposed. OPDC

incorrectly recognised as landowner of the Grand Union Canal, whereas they are in fact just a management organisation. Unless this is recognised, it has impact on the soundness of the Local Plan consultation.		has confirmed with the Canal and River Trust that for the purposes of the Local Plan, references to the organisation as a landowner is appropriate.
Historic attempts were made to deliver a northern towpath along the Grand Union Canal, and the land to allow for this may still be in public ownership.	Regents Network	Noted. This information will be used to inform future detailed proposals.
Concerns of the proposal for the southern towpath to deliver a 2-way cycle lane. Width of tow path should be increased.	Regents Network, Canal & River Trust, ArtWest, Nicky Guymer, Bruce Stephenson, Hammersmith Society, Oonagh Heron, Mark Walker, West Twyford Residents Association, Old Oak Interim Neighbourhood Forum, Dave Turner, Regents Network, TITRA, Midland Terrace Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Policy P3 has been amended to reflect the character and transport roles of the towpath while recognising width restrictions to support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.
Intention to focus A3 and A4 uses onto the canalside adjacent the canal is supported, though negative impacts should be considered through detailed design.	Regents Network	Noted. Policy P3 provides guidance to ensure land uses support the activation of the canal and canalside spaces.
Concern that uniform building heights of 6-8 storeys along the canal will have a negative impact on amenity, and that amenity standards are not high enough.	Canal & River Trust, The Inland Waterways Association-Middlesex Branch	Change proposed. To recognise the need for building heights to respond to site specific circumstances, supporting text to P3 has been amended to highlight the need to provide appropriate enclosure along the canal. It should be noted that any proposal will need to accord with all other relevant planning policy and material

		considerations to provide appropriate levels of amenity and a high quality built environment.
Crossing points may not be best locations for taller buildings along the Canal. Tall buildings will obstruct views and vistas along the canal and use for wayfinding is questionable.	Canal & River Trust, Old Oak Interim Neighbourhood Forum, The Inland Waterways Association-Middlesex Branch, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. To respond to public transport access and support legibility where major routes cross the canal, tall buildings are considered to be appropriate. Proposals for tall buildings at these locations will be considered on a case by case basis and will be determined using all other relevant planning policy and material considerations.
Policy should make clear that assessment of building heights will consider impact on heritage, character, biodiversity and amenity will be made at application stage. Retention of Birchwood Nature Reserve is supported.	Canal & River Trust, Sarah Abrahart, ArtWest, Regents Network	No change proposed. Assessment of buildings heights will be carried out in accordance with national guidance, London Plan policies and Local Plan policies (specifically policies SP8, SP9, D8, D5 and D6).
The CRT have no in principle planning objections to the proposed canal crossings. New crossings require the CRT's agreement, but role of secretary of state and highway authority should also be highlighted.	Canal & River Trust	Change proposed. OPDC considers highlighting the need for Canal and River Trust's and other stakeholder's agreement for crossings should be referenced within the supporting text to policy P3.
New bridges will need to be of high quality to ensure high quality public realm. Stronger wording should be provided	Canal & River Trust	No change proposed. Requirements for high quality design of buildings and the public realm are made in Policies D2 and D4.
The CRT are not convinced of the need for a bridge crossing within the Channel Gate area, but have no objection to its inclusion in the plan.	Canal & River Trust	Noted. Further detailed feasibility studies for a bridge in this location will be undertaken following the release of sites for development.
Opportunity may exist to re-use the Brunel Bridge from Paddington within the Old Oak development area.	Canal & River Trust	Noted.
Support for new permanent and temporary moorings. CRT suggest strengthening policy wording to provide stronger support. Detailed	Canal & River Trust, Hammersmith Society, Regents Network, Wells House Road Residents Association, Joanna Betts,	No change proposed. OPDC considers that the policy gives appropriate support to moorings.

issues such as servicing and infrastructure when the CRT assess individual applications.	Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
Text should be added to Policy P3 to to protect the waterway from adverse impacts from new development, including structural integrity and land stability.	Canal & River Trust	Change proposed. OPDC has amended the Local Plan to highlight the need to manage impacts of structural integrity on the canal.
CRT support the intention of a linear park along the Canal and feel consideration should be given at detailed design stage to how this will connect with other green spaces. Also welcome requirements for appropriate light levels given adverse impact on foraging bats.	Canal & River Trust, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Where appropriate, development contributions should be sought for improvements of the environmental quality of the canal.	Canal & River Trust	Change proposed. The supporting text has been amended to seek contributions.
Welcome support for waterborne freight transport but feel the Plan could be stronger in requiring developers to consider its use.	Canal & River Trust, Regents Network	No change proposed. Policy T7 requires development to maximise the use of more efficient and sustainable ways of delivering freight including by water.
Welcome designation of Grand Union Canal as a separate Place.	The Inland Waterways Association-Middlesex Branch	Noted.
Welcome vision for canal towpath.	The Inland Waterways Association-Middlesex Branch	Noted.
No locations for new water spaces have been identified. Unless such spaces are safeguarded it is unlikely they will be realised.	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P3 provides guidance for the delivery of new basins and waterspaces. Specific locations have not been identified to enable a flexible approach to their delivery.
Precedent of Chicago Riverwalk is inappropriate for the Grand Union Canal.	The Inland Waterways Association-Middlesex Branch, Regents Network	No change proposed. OPDC considers Chicago Riverwalk to be an appropriate precedent.

Support approach to Grand Union Canal and proposal to implement a Conservation Area along its length.	London Borough of Ealing, Raymond Gill, Hammersmith and Fulham Historic Buildings Group, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Conflict between pedestrians and cyclists needs to be addressed along the towpath.	Bernie Timmins	Noted. To support the southern towpath's designation as part of the National Cycle Network and as a proposed TfL Quietway while reflecting width restrictions along its length, OPDC considers that OPDC's Public Realm, Walking and Cycling Strategy's recommendations to deliver a shared walking and cycling route is appropriate. This would be delivered in accordance with policy P3 and T2 which provides guidance to support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.
In Policy P3 Grand Union Canal subsection o) i) there is a typo “twith”.	Royal Borough of Kensington and Chelsea	Change proposed. Typo to be corrected.
Recommend that P3 is amended to reference the Water Framework Directive and the absolute requirement for changes not to result in deterioration of the waterbody and by including the improvement measures in the Infrastructure Delivery Plan.	Environment Agency	Change proposed. OPDC has made reference to the Water Framework Directive within the supporting text to Policy P3 and EU3.
Paragraph 165 of the NPPF promotes Planning Policies drawing on River Basin Management Plans and we feel that the Local Plan and	Environment Agency	Change proposed. Policy EU3 has been amended to make reference to the Thames River Basement Management Plan.

relevant evidence base documents could be added to ensure that this is achieved. Seek to work with OPDC and the Canal and River Trust to understand what clean water discharge modifications may look like		
There is no information about funding developments on the Grand Union Canal.	Friary Park Preservation Group	No change proposed. Potential funding of infrastructure is set out in policy DI1. Funding of development will be provided by the relevant developer.
P3 should clarify future environmental controls for transporting waste via the canal.	Nicky Guymer, Bruce Stevenson, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, TITRA, Midland Terrace Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The supporting text has been amended to include new wording clarifying environmental controls for transporting waste via the canal.
The canal is an important space for green space, leisure, sport and creating an attractive environment that preserves heritage.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Support Canal and River Trust comments for regulation 18 Local Plan.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Support green corridor on north of the canal but this should go behind the warehouses.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	Noted. Policy P3 sets the principle for delivering a new Local Park along the Grand Union Union Canal. Further detailed work will need to be undertaken to identify the

	Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	specific location and boundaries of the park.
Support proposal for buildings to be 6-8 storeys (maximum) but do not agree with taller elements at node points.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. To respond to public transport access and support legibility where key routes cross the canal, tall buildings are considered to be appropriate. Proposals for tall buildings at these locations will be considered on a site by site basis and will be determined using all other relevant planning policy and material considerations.
Support the use of the canal for heating and cooling.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Oppose longer term moorings along the Grand Union Canal	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that longer-term moorings alongside temporary and shorter term moorings will play a role in supporting the historic canalside character, meeting housing need and activating the canal.
Support potential for boating and canoeing on the Grand Union Canal	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Marinas should be encouraged to activate the canal.	West Twyford Residents Association	Noted. Policy P3 supports the delivery of new basins and waterspaces.
The Local Plan should recognise that a local water transport service is being set up on the doorstep of the	Regents Network	No change proposed. OPDC considers P3 provides appropriate supporting guidance for water transport

OPDC area. This is being delivered by the Mayor's London Waterways Commission Freight Group, in association with UCL University College London, the Commercial Boat Operators Association and the Just Space Network		services.
The Local Plan does not adequately deal with the Grand Union Canal with limited mention of it.	Regents Network	No change proposed. OPDC considers that the provision of guidance for the Grand Union Canal in the Spatial Vision, Strategic Policies, P3 and relevant development management policies provides a sufficient level of detail and consideration of the canal.
The Local Plan should not be as supportive of canal moorings for residential boats	Regents Network	No change proposed. OPDC considers that residential moorings alongside other types of moorings will play a role in supporting the historic canalside character, meeting housing need and activating the canal.
Canal moorings should not be seen as a way of meeting need for homes	Regents Network	No change proposed. OPDC considers that residential moorings contribute to meeting housing need.
Should have a policy supporting the provision of a narrowboat hire centre	Regents Network	No change proposed. OPDC considers that specifically requiring the delivery of a narrowboat hire centre goes beyond the role of a Local Plan. Policy P3 provides guidance for the delivery of supporting infrastructure for moorings.
References to a Cycle Quietway along the Grand Union Canal should be removed. The Public Realm, Walking and Cycling Strategy does not come up with a workable solution for the quietway.	Regents Network	No change proposed. To reflect emerging proposals, OPDC considers it appropriate to make reference to the proposed TfL Quietway. OPDC also considers that OPDC's Public Realm, Walking and Cycling Strategy's recommendations to deliver a shared walking and cycling route is appropriate. This would be delivered in accordance with policies P3

		and T2 which provide guidance to support the delivery of a high quality, safe, accessible and inclusive walking environment across Old Oak and Park Royal.
Support use of Here East as a precedent	Regents Network	Noted.
Proposed walking/cycling route along canal in front of Powerday site would preclude movement of waste by water and conflict with other policies SP7 and EU6.	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P3 sets the principle for delivering a new walking and cycling route along the northern edge of the Grand Union Union Canal. Further detailed work will need to be undertaken to identify the location and extent of this route.
It is unclear how the trend to more public activities and public spaces along the canal will be managed and married with the character of the canal corridor.	London Borough of Hammersmith and Fulham	No change proposed. OPDC considers Policy P3 to provide an appropriate level of guidance for a Local Plan for the use and character of the canal. OPDC is developing a Waterspace Strategy and is designating a conservation area for the full length of the canal within the OPDC area which will provide further guidance for the use and character of the canal.

Regulation 19(2) consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Support recognition of the role of the Grand Union Canal.	Canal & River Trust, The Inland Waterways Association, Regents Network	Noted.
Support for Policy P3	Canal & River Trust	Noted.
P3 Vision should make reference to the canal's role within the community and health and well being.	Canal & River Trust, The Inland Waterways Association	Change proposed. P3 Vision will be amended to make reference to the canal as a community asset.
Concern that uniform building heights of 6-8 storeys along the canal will have a negative impact on amenity.	Canal & River Trust	Noted. Please refer to response P3/6 made to the First Regulation 19 consultation.
Previous comments	Canal & River Trust	Noted. Please refer to

regarding stronger design guidance for bridges still stand.		response P3/10 made to the First Regulation 19 consultation.
Support for moorings policy.	Canal & River Trust, The Inland Waterways Association	Noted.
Delivering natural surveillance should not adversely impact on moorings.	Canal & River Trust	Noted.
P3 should include guidance to protect the structure integrity of the Grand Union Canal.	Canal & River Trust	No change proposed. Policy D2(a)(vi) requires development to support the operation of infrastructure. Supporting text paragraph GUC.15 to P3 elaborates this policy by requiring that any infrastructure adjacent to or across the canal will need to ensure that the canal's structural integrity is not compromised.
Support aspiration to secure contributions to enhance the canal.	Canal & River Trust	Noted.
The towpath should be recognised as a Quietway supplemented with additional walking and cycle routes.	Canal & River Trust	No change proposed. TfL does not currently plan to deliver a Quietway along the Grand Union Canal.
Guidance for supporting the use of the canal for heating purposes should be reinstated.	Canal & River Trust	No change proposed. Policy EU10 provides guidance for delivering low carbon heat systems. Supporting text to P3 and EU10 recognise the Grand Union Canal as a potential source of heat.
Question removal of reference to a water space strategy. A comprehensive strategy for the Grand Union Canal should be developed.	Canal & River Trust, The Inland Waterways Association	No change proposed. OPDC, the Canal and River Trust and stakeholders are working together to deliver a water space strategy. This will be used to support future planning guidance, including future Local Plans. However, it will not be published in time to inform this version of the Local Plan. As such references have been removed.
P3 should refer to "heritage canalside warehouses"	Hammersmith Society	No change proposed. These warehouses are proposed to be identified as Buildings of Local Heritage Interest that will clarify their status as non-

		designated heritage assets. Non-designated heritage assets are referenced in policy SP9 and policy D8.
Removal of reference to the Grand Union Canal Linear Park is not supported.	The Inland Waterways Association	No change proposed. The Grand Union Canal Linear Park has been replaced within Policy P3 by the Grand Union Canal Local Park and references to deliver other smaller open spaces and improvements to existing open spaces.
Adequate space along the tow path should be provided to support canal users.	The Inland Waterways Association	Noted. Policy P3 seeks to deliver supporting infrastructure for moorings along the canal.
Support Sir Terry Farrell's vision for Park Royal City in relation to the Grand Union Canal.	The Inland Waterways Association	Noted. This document does not have planning weight. Policy P3 and any related water space strategies will be developed with stakeholders to enhance the Grand Union Canal.
Note that the Water Framework Directive is reference in the supporting text. This should be included in the policy. P3 should also seek to prevent the deterioration of the canal and raise its status.	Environment Agency	No change proposed. The National Planning Practice Guidance states that Local Plans should avoid undue repetition. It is not considered appropriate to repeat national guidance within the policy. The reference to the Water Framework Directive will be retained in the supporting text. No change proposed, the P3 Vision and policy provide guidance to conserve and enhance the Grand Union Canal. Policy P3 provides a range of guidance to ensure it will be a defining feature of the OPDC area.
Ownership information of the Grand Union Canal is incorrect.	Regents Network	No change proposed. OPDC has confirmed with the Canal and River Trust that the ownership information provided in P3 supporting text is correct.
Concern regarding impact of development on the canal. Moorings should not be referred to in the P3 vision as	Regents Network	Noted. Please refer to response P3/6 made to the First Regulation 19 consultation.

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

		routes in Old Oak North to be designed as appropriate for the level of demand. This includes the route along the north of the canal.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Grand Union Canal Massing and Enclosure Statement	• Generally, 6-8 storeys for mixed-use development is suitable to provide an appropriate sense of enclosure to the canal and canalside spaces. • Taller heights may be appropriate at crossings of key routes subject to site specific considerations.
Old Oak North Development Framework Principles	• Deliver the Grand Union Canal Local Park comprising Canal Park and an enhanced Birchwood Nature Reserve. • Deliver a continuous walking/cycling route to the north of the canal integrated with the Local Park. • Deliver building shoulder heights of 6-8 storeys. Taller heights may be appropriate at crossings of key routes subject to site specific considerations.

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Integrated Water Management Strategy and Utilities Study	• Surface water should be discharged to the Grand Union Canal, where possible, in order to reduce the risk of sewer flooding and minimise the volume of surface water that is treated at the Beckton Sewage Treatment Works.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal including the delivery of improvements to the two path and a continuous walking/cycling to the north of the canal.
Environmental Standards Study	Deliver the Grand Union Canal Local Park along both sides of the Grand Union Canal at two hectares in size.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including

N/A	**N/A**	N/A

Other evidence base

Supporting Study	Recommendations
	• None

P4. PARK ROYAL WEST

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners 3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use

	of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in

	a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	Policy and paragraph text
Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character

	and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place. Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As

	change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	Policy and paragraph text
PRINCIPLE L2: Park Royal	Park Royal performs a vital role in supporting the London economy. Building on the area's existing success there is a fantastic opportunity for Park Royal to become the UK's leading industrial location. Park Royal could establish itself as a globally recognised centre for developing innovations such as smart and clean-tech industries. There are also opportunities to attract growing businesses from Imperial College Campus into Park Royal. This can be achieved by; continuing to protect Park Royal as a Strategic Industrial Location (SIL); identifying interventions to improve transport and utility (including connectivity) infrastructure; managing impacts generated during and after the redevelopment of Old Oak; and developing planning and design policies that encourage development that makes more efficient use of land and that works to attract different sectors to the area through the OPDC Local Plan. Today Park Royal houses approximately 1,200 workspaces, employing over 30,000 people in over 2.3 million square metres of gross floor area. The area's historical development has seen changes in the types and form of businesses. During the life of this plan there is a need to improve the operation of the estate and where possible to intensify uses to cater for up to 10,000 new jobs. Given the timescales involved what is most important now is the development of a place that functions well, and which is an attractive business location. Whilst there may be opportunities to support and promote the location of specific business sectors, it is important to retain flexibility to ensure Park Royal can evolve to changing market demands in a timely manner. Park Royal could also play a valuable role in accommodating displaced employment floorspace and businesses from Old Oak. Outside of SIL, development should be more mixed use, and should look to deliver a minimum of 1,500 homes. In the centre of Park Royal, the existing retail centre should be enhanced and expanded so that it can become a local hub for residents and businesses in Park Royal to include business support services and uses such as meeting spaces and business hotels. The existing character of the Wesley Estate and the nearby playing fields should be enhanced with the Heart of Park Royal reinvigorated to provide a range of services for local communities.
PR1: Land Use	a. The GLA will continue to support Park Royal as London's leading industrial area by: • protecting existing Strategic Industrial Locations (SIL); and

	• promoting development and intensification on SIL land. b. New employment proposals in Strategic Industrial Locations should: • deliver new workspace that maximises and intensifies the use of the site to support delivery of 10,000 new jobs in Park Royal and where possible accommodate business relocations from elsewhere in the OAPF area. • deliver new employment workspace that meets identified needs for micro, small and medium enterprises and studios with higher employment densities in locations within easy walking distance to public transport services and/or town centres and elsewhere for larger enterprises with lower employment densities. c. support the delivery of nationally significant railway infrastructure. d. New residential uses should be directed to non SIL, including the First Central site where they can be delivered so as not to impact on the functioning of surrounding SIL; f. Within the First Central site, proposals for office and residential floorspace and ancillary retail, health and leisure facilities will be supported where they: • improve walking, cycling and public transport access to Park Royal London Underground Station; • improve walking and cycling to the existing residential areas to the north; and • enhance the adjacent wildlife corridor to the south-west. g. Within the existing residential area of the Wesley Estate and the adjacent Wesley Playing Fields, proposals which support the existing residential character, improve the quality of the public realm and Wesley Playing Fields and improve walking and cycling routes to and from these locations and the Grand Union Canal will be supported.
PR2: Infrastructure	a. Proposals should seek to improve transport and utilities infrastructure. b. Improvements to: • the road network should be undertaken across Park Royal, OPDC is currently progressing a Park Royal Transport Study with TfL and the Park Royal Business Group. This work should identify recommendations for improvements to the transport network. This may recommend improvements along the four main roads of Abbey Road, Acton Lane, Park Royal Road and Coronation Road and at junctions with the North Circular Road (A406), Western Avenue (A40) and Old Oak Lane (A4000); and • the walking and cycling network should be focussed along the routes shown in figure 72. c. Proposals for employment floorspace should demonstrate how they will maximise the use of sustainable transport modes and facilities for freight movement.
PR3: Streets & Public Realm	Proposals should: a. deliver a safe, permeable and legible movement network in accordance with figure 72; b. Improve streets and create a public realm that enhances local connectivity across Park Royal and to surrounding neighbourhoods; c. encourage the location of offices and smaller business spaces along the street front to deliver activity along the ground floor and above across Park Royal including the Grand Union Canal, where feasible; d. utilise a coordinated palette of high quality durable materials and street furniture to support Park Royal's role and reflect and improve its local character; and e. support the coordinated management of the public realm.

<table>
<tr><td>PR4: Public Amenity Space</td><td>Proposals should accord with Principle D1 and London Plan Policy 7.18 to deliver:<table>
<tr><td>Name</td><td colspan="2">Location</td><td>Guidance</td></tr>
<tr><td>b.</td><td>Other small amenity spaces</td><td>Located across Park Royal</td><td>These new public amenity spaces should be delivered with stakeholders to deliver a high quality working environment.</td></tr>
<tr><td>c.</td><td colspan="3">Improvements to existing public amenity spaces such as Wesley Playing Fields and canal side spaces would be encouraged and supported.</td></tr>
</table></td></tr>
<tr><td>PR5: Building Height & Density</td><td>New building heights should accord with the guidance set out in the table below and depicted in figure 45:<table>
<tr><td colspan="2">Location</td><td colspan="2">Guidance</td></tr>
<tr><td>b.</td><td>First Central</td><td>Highest</td><td>A taller building could be located closest to Park Royal tube station and the A40. Any tall building proposals would be subject to a detailed design analysis, would need to accord with London Plan policies 7.6 and 7.7. and would need to be enable delivery of a fully accessible public space and route through the site.</td></tr>
</table></td></tr>
</table>

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	**Alternative Policy Option**
4.4	N/A. 4.4 Alternative policy options have not been provided for the preferred policy options as the Old Oak and Park Royal Opportunity Area Planning Framework sets out the principles for each of the places. Overarching consultation questions for the places can be found in Policy OSP5 (chapter 4).

Key Consultation Issues

Regulation 18 consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Identifying Park Royal as one Place ignores the spatial variations in character (size of units and uses). Local Plan should use a more fine grained approach and identify distinct, smaller places and/or in appropriate policies (including on open	London Borough of Brent, London Borough of Ealing	Change proposed. Changes have been made to the Local Plan to identify an additional place (Old Park Royal) meaning that there are now 3 Places covering Park Royal. Further work has been undertaken to expand on the evidence base, including the completion of the Future Employment Growth Sectors Study, Heritage Strategy and Character Areas Study. This has helped to refine the place boundaries and informed the identification of Old Park Royal. The employment chapter includes policies (E2 and E3) on overarching considerations such as the

workspace).		mix of unit sizes and the need for low cost workspaces.
Seeking clarification on the description of the former Twyford Tip.	London Borough of Brent	Noted. The Place policies and supporting text have been updated.
Question whether OPDC is proposing changes to the Park Royal neighbourhood centre to include Central Middlesex hospital.	London Borough of Brent	Noted. The Local Plan includes the boundary for Park Royal neighbourhood centre. This boundary includes the Central Middlesex Hospital site as it provides a key function within the town centre.
Need to consider open/green space needs in Park Royal	London Borough of Brent, workshop	Noted. The Environmental Standards Study has examined what level/standard of green infrastructure may be appropriate across Old Oak and Park Royal. The approach has taken into account the fact that the Park Royal is an industrial estate and the need to support the continued successful operation of businesses in the area. The findings from the Study identify a number of opportunities to embed green infrastructure including rooftop farming, green roofs/walls and as part of the public realm.
Development should seek to improve connections between residential areas, tube stations and key facilities with a suggestion to provide improved mixed use streets which provide activity and sense of security.	London Borough of Brent	Noted. The Park Royal place policies refer to improvements along the primary routes that run through Park Royal and connect up the stations and the residential areas and meet at the neighbourhood centre. These improvements include enhancing the public realm, walking and cycling routes, lighting and wayfinding. Additional development is being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in the area.
The retail/ leisure park at Park Royal could be redeveloped and improved with new facilities to create a quality place.	London Borough of Brent	Noted. The Park Royal West place (Policy P4) focuses on protecting industrial land and uses, unless a specific need has been identified for alternative uses. The rationale for protecting industrial land is set out in the Industrial Land Review.
Need to consider amenity impacts of employment uses	London Borough of Brent, workshop	Noted. The Park Royal place and Employment policies will ensure that appropriate mitigation is in place so that there are no significant adverse impacts to the functioning of the SIL area and to amenity.
Need to increase permeability across rail lines between Park Royal and the north and surrounding areas	London Borough of Brent, workshop	Noted. The Park Royal Transport Strategy and the separate Public Realm, Walking and Cycling Strategy identify the opportunities to improve the quality and function of the movement network so that there are good connections for all users/modes across the area. There are significant constraints to increasing permeability and creating new connections around Park Royal

		due to the barriers created by the railway lines. Therefore, the Park Royal places policies also seek to improve existing links to/from and over these infrastructure barriers.
The key on Figure 39 includes public civic spaces, but these spaces are not highlighted on the figure.	London Borough of Brent	Noted. All figures have been updated in the Local Plan.
Need to identify locations/smaller scale places for small and micro businesses	London Borough of Brent	Noted. The policy approach has been structured to clarify support for a range of flexible workspaces (such as open workspaces and studios) and the provision of a mix of unit sizes, including micro and smaller business units. Small workspaces are taken up by a wide variety of employment sectors which could be compatible with a variety of other uses and, therefore, could be suitable in a number of locations. The Plan does not restrict where they can be located to allow for an appropriate level of flexibility.
Support SIL boundary changes if buffer around residential uses provided	London Borough of Brent	Noted. Local Plan policies will require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses.
Need to improve pavements in Park Royal so they can help meet inclusive mobility standards and tree planting.	London Borough of Brent	Noted. All of the Park Royal Place policies refer to the need for proposals to support improvements to the transport network and the public realm for all users. Additional information/ requirements for this are provided in the Design chapter.
Need public realm enhancements around Harlesden and Stonebridge Park stations	London Borough of Brent	Noted. The Park Royal West place policy (P4) refers to the need for proposals to support improvements to the public realm on routes to/from stations.
Lakeside Drive is incorrectly plotted.	Diageo Plc, SEGRO	Change proposed. All figures have been updated in the Local Plan.
Improvements to transport and infrastructure in Park Royal are welcomed	Diageo Plc	Noted.
Sites in Park Royal with development capacity and where infrastructure improvements are needed should also be considered in Development Capacity Study	Diageo Plc	Noted. Future development on non SIL sites is taken in account in the Development Capacity Study. The Place policies and IDP identify infrastructure requirements needed to support development. The intensification of Park Royal to increase the number of jobs is also considered in a separate study.
Diageo would like to be kept updated on future consultations.	Diageo Plc	Noted.

Difficult to set policy for Park Royal in advance of new London Plan due to potentially conflicting priorities for SIL.	London Borough of Ealing	Noted.
OPDC should support call for GLA to undertake a full review of the role of logistics functions in London	London Borough of Ealing	Noted. OPDC works closely with the GLA in order to understand how the Local Plan can support the objectives in the London Plan. OPDC has developed its evidence base including the Industrial Land Review and Future Employment Growth Sectors Study to assess the potential demand for certain uses, and we understand the role that logistics does and can continue to play in OPDC's area. This evidence base is shared with all partners, including the GLA but ultimately the GLA are responsible for identifying and planning for strategic matters for London, and matters related to the review of the London Plan should be directed to them in the first instance.
Need to provide environmental enhancements and to promote active uses on main routes	London Borough of Ealing	Change proposed. The Environmental Standards Study has examined what targets may be appropriate across Old Oak and Park Royal. The approach has taken into account the fact that the Park Royal is an industrial estate and the need to support the continued successful operation of businesses in the area. The findings from the Study identify a number of opportunities such as embedding more green infrastructure and reducing the heat island effect. The Park Royal place policies focus improvements on the four primary routes that run through Park Royal and connect up the stations and the residential areas and meet at the neighbourhood centre. These improvements include enhancing the public realm, walking and cycling routes, lighting and wayfinding. Also, additional development is being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in the area.
Intensifying Park Royal would result in rising rental values	London Borough of Ealing	No change proposed. The rent levels across Park Royal are already increasing and given the loss of industrial land across London, this situation may continue in the short to medium term. The point of intensification is to increase the number of jobs and employment densities across Park Royal. A number of strategies could be taken forward to achieve this including horizontal/vertical extensions, infill or comprehensive development. Intensification could therefore help increasing the amount of floorspace/development possible on individual sites, and improve the balance between supply and demand in this location. Importantly, policies

		in the Employment chapter (E1, E2, E3) seek to safeguard industrial land, provide a mix of small units and/or low cost workspace which should help ensure industrial rent will apply to this area and greater affordability for smaller and start-up businesses.
Need to be clear that change will be incremental and organic.	London Borough of Ealing	Noted.
Need to include more detail about existing spatial context for Park Royal.	London Borough of Ealing	Change proposed. Further work has been undertaken to expand on the evidence base, including the completion of the Heritage Strategy and Character Areas Study. This has helped to refine the place boundaries and informed the understanding of their spatial context and the details included in the Park Royal place policies.
Support the continued role of Park Royal as a successful employment area, but question whether approach to SIL is over-simplistic/blunt/not flexible enough given the varied nature of existing uses and over the longer timeframe.	Midland Terrace Resident's Group, Old Oak Interim Forum	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is reflected within the Local Plan's strategic policies.
Recognise the need to protect 'industrial land' in London. However, there is potential for new, innovative typologies to emerge that test higher densities, sharing facilities, or different mixes of use.	Midland Terrace Resident's Group	Noted. OPDC has been exploring opportunities increase the number of jobs and employment densities across Park Royal. The Intensification Study identifies a number of strategies that could be taken forward to achieve this including horizontal/vertical extensions, infill or comprehensive development. The Study has also developed typologies which are relevant to the Park Royal context. Taking a more blurred approach and mixing non industrial land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is already reflected within the Local Plan's strategic policies.
The 'residential pockets' remain isolated within 'strategic industrial land' area. They should be better	Midland Terrace Resident's Group, Old Oak Interim Forum, workshop, workshop	Noted. The Park Royal place policies refer to improvements along the primary routes that run through Park Royal and connect up the stations and the residential areas and meet at the neighbourhood centre. These improvements include enhancing the public realm, walking and

/connected		cycling routes, lighting and wayfinding. Additional development is being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in the area.
Restrictive 'zoning' policy has not improved the local environment or quality of life. Park Royal is deficient in community infrastructure.	Midland Terrace Resident's Group	No change proposed. Park Royal will continue to be protected as a Strategic Industrial Location (SIL) to support broad industrial and related activities. OPDC has identified the range of infrastructure required to be provided within development area to meet the needs of the new population. The Local Plan specifies what infrastructure is needed, when, where and who and how it will be provided. Additional development is being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in the area.
There is the potential for mixed use areas to link up existing residential areas and a new proposed Place.	Midland Terrace Resident's Group	Change proposed. A new Place has been identified called Old Oak Lane and Old Oak Common Lane. This sets out clear guideline on the appropriate mix of uses, including industrial/employment uses, in this location. The approach takes into account that this is a transition point between Old Oak and Park Royal and how to protect SIL and support the existing residential communities in this area, including Midland Terrace. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. OPDC considers that enhancing Park Royal and delivering new forms of industrial workspace will help to contribute to delivering sustainable communities, specifically in relation to residential amenity and providing local employment opportunities. Policies will require that any new SIL uses in this area are designed to minimise impacts on surrounding residential uses.
No clear justification for extending the existing SIL area. More bespoke policies could be developed to protect vital uses.	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. The Industrial Land Review sets out the rationale for continuing to protect and extend the Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role.
The new homes	Midland Terrace	Noted. These targets have been updated in the

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

is required regarding intensification of industrial uses.		opportunities increase the number of jobs and employment densities across Park Royal. The Intensification Study identifies a number of strategies that could be taken forward to achieve this including horizontal/vertical extensions, infill or comprehensive development. The Study has also developed typologies which are relevant to the Park Royal context. This evidence base has been used to inform the Park Royal place policies and the Employment policies.
Original proposals for First Central did not provide all of the infrastructure promised.	West Twyford Residents' Association	Noted. The Local Plan is promoting additional development on the First Central site and provides clear guidance on what is expected in terms of infrastructure in this location.
Improvements to Park Royal's infrastructure will be particularly complicated because of its existing context and ownership patterns. It is not clear how/where modes of transport will be accommodated to support jobs growth. Improving the street scenes will not improve the situation as footpaths and kerbs are used as part of the existing business operations.	West Twyford Residents' Association	Noted. The Park Royal Transport Strategy and the separate Public Realm, Walking and Cycling Strategy identify the opportunities to improve the quality and function of the transport network for all users/modes. In line with the Park Royal place policies and Transport policies, development proposals will be expected to contribute towards or deliver these improvements and demonstrate adequate access and servicing arrangements.
Suggestion for Acton Lane National Grid frontage improvements	Local resident	Noted. The Park Royal place policies refer to improvements along the primary routes that run through Park Royal; this includes Acton Lane. These improvements include enhancing the public realm, walking and cycling routes, lighting and wayfinding.
Park Royal should be kept as one Place	Local resident	Noted. The Park Royal Atlas and Industrial Land Review provide baseline information and insight into the characteristics of Park Royal. Further work has been undertaken to expand on the evidence base, including the Character Areas Study, Heritage Strategy and Future Employment Growth Sectors Study. This body of work has helped to refine the place boundaries. Having a single boundary would ignore the spatial variations and priorities across Park Royal. OPDC have therefore amended the boundaries to identify 3 places covering Park Royal: Park Royal West, Park Royal Centre and Old Park Royal.

Park Royal's industrial function should be protected.	Local resident	Noted. The Local Plan policies support the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Location boundary.
There is an opportunity to make better use of and to redevelop McVitie's car park	Local resident	Noted. OPDC has been exploring opportunities increase the number of jobs and employment densities across Park Royal. The Intensification Study identifies a number of strategies that could be taken forward to achieve this including horizontal/vertical extensions, infill or comprehensive development. The Study has also developed typologies which are relevant to the Park Royal context. This evidence base has been used to inform the Park Royal place policies and the Employment policies.
The proposed intensification with some but limited non-industrial and housing use with access to Park Royal station, seems proportionate.	Local resident	Noted.
Residential uses should not be allowed in Park Royal	Local resident	Noted. The Local Plan policies support the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Location (SIL) boundary. Residential development is only being promoted on non-SIL sites including those in Park Royal Centre and around First Central and Brewery cluster.
Other existing interwar housing areas could be included in the area	Local resident	Noted. Existing residential streets are identified in the mapping of the area.
Extend Old Oak West, this could include Wesley Estate	Local resident	No change proposed. Channel Gate (formerly Old Oak West) was identified to include clear long term priorities for this land to mitigate impacts whilst it is used by HS2 and when it is no longer required as a HS2 work site. These circumstances do not apply to Wesley Estate and also the railway forms a key boundary for Channel Gate place.
Concern that new residents will not stay long or be integrated, feel/become part of the community (i.e. there is a shuttle bus to Willesden Junction, First Central)	workshop	Noted. The place policies include measures to support the integration of residential areas such as the phased delivery range of services to meet the needs of local communities in the area, increasing job opportunities so people can work and live nearby, enhancing open space provision, the public realm, and walking and cycling routes. These measures will contribute towards the delivery of sustainable neighbourhoods.
Want to promote vibrant uses (retail, cultural) and connect	workshop	Change proposed. A new Place has been identified called Old Oak Lane and Old Oak Common Lane. This sets out clear guideline on

communities along Victoria Road		the appropriate mix of uses, including industrial, employment, retail uses, in this location. The approach takes into account that this is a transition point between Old Oak and Park Royal and how to protect SIL and support the existing residential communities in this area. A new neighbourhood town centre is being promoted at Atlas Junction to increase the range of services available for local communities in the area.
Suggest Atlas Road roundabout should be a neighbourhood hub	workshop	Change proposed. Additional development is being promoted at Atlas Junction to increase the range of services available for local communities in the area. Atlas Junction is being proposed to be designated as a neighbourhood town centre.
Wesley Estate should be better integrated by connecting it to new open space, new mini high street and only allowing lower rise buildings.	workshop	Noted. The Park Royal place policies refer to improvements along the primary routes that run through Park Royal and connect up the stations and the residential areas and meet at the neighbourhood centre. These improvements support the integration of residential areas such as Wesley Estate and First Central by enhancing the public realm, walking and cycling routes, lighting and wayfinding along these key routes. Also, additional development is being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in the area.
There are already new restaurants opening in Park Royal but there may not be enough	workshop	Noted. The Park Royal Centre place policy (P6) supports additional town centre uses and services in order to meet the needs of the business and residential community. Additional retail development is also being promoted at First Central and Atlas Junction to increase the range of services available for local communities in these areas.
There is the potential for a small marina in Park Royal	workshop	Noted.
Should not support transport intensive uses in Park Royal SIL due to existing problems with traffic congestion	workshop	No change proposed. The Industrial Land Review and the Future Employment Growth Sectors Study project ongoing demand for a range of industrial uses, some of which are more transport intensive than others such as transport and logistics operations. The Plan supports a range of sectors to respond to market demands and in order to ensure that Park Royal continues to have a diverse and resilient employment base. The Plan does acknowledge the high levels of traffic and congestion in Park Royal, and seeks to minimise this by supporting changes to travel behaviour and more sustainable practices (increasing/improving walking and cycling provision, ensuring access to public transport, promoting consolidation delivery and servicing

		arrangements between businesses or increasing efficiency by reducing 'empty running' of logistics vehicles).
Could split Park Royal Place into north and south	workshop	Change proposed. The Park Royal Atlas and Industrial Land Review provide baseline information and insight into the characteristics of Park Royal. Further work has been undertaken to expand on the evidence base, including the Character Areas Study, Heritage Strategy and Future Employment Growth Sectors Study. This body of work has helped to refine the place boundaries, which includes revisions to split Park Royal into: Old Park Royal, Park Royal West and Park Royal Centre.
More buildings needed which are better suited for commercial uses. Existing buildings could be reused for live/work/resi.	workshop	Noted. The Local Plan policies support the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Location (SIL) boundary. Residential development is only being promoted on non-SIL sites including those in Park Royal Centre and around First Central and Brewery cluster. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role.
Concerned about the impact and length of construction period, including the impacts on local businesses	workshop	Noted. The Transport policies will ensure appropriate mitigation is secured to manage potential adverse impacts related to construction.
Should be more flexible with the SIL designation to allow non-industrial, mixed use spaces	workshop	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London, a pan London need for SIL and the area's London-wide role. Taking a more blurred approach to land uses in Park Royal would result in rapid land value increases, pushing existing industrial occupiers out of the estate and undermining the function of London's largest industrial estate. The Plan supports the potential for a mix of land uses in Old Oak and this is reflected within the Local Plan's strategic policies.
Support for maximising the use of industrial land and car parking areas	workshop	Noted.
CPZ near PRNC should be enforced.	workshop	Noted. Brent Council and Ealing Council are the local highway authorities with responsibilities for parking enforcement on public roads in this area. OPDC does not have the legal powers to do this.

		As this is the case, OPDC is limited to working closely with these boroughs to help develop approaches to managing car parking in Park Royal.
Concerns over safety, parking is free and having to walk at night is worrying	workshop	Noted. The Park Royal place and Transport policies are trying to encourage more people to walk and cycle to Park Royal. However, these policies acknowledges that a number of improvements needed to support this objective including enhancements to the public realm, more active frontages to increase surveillance, improving and creating new walking and cycling routes and better lighting and wayfinding.
Query whether hospital will stay and whether there will be sufficient health provision for the anticipated population in Park Royal area	workshop, commonplace	Noted. The Park Royal Centre place (P6) policy supports the retention of Central Middlesex hospital. The Education and Health Study assesses the need for new facilities in OPDC's area to ensure sufficient provision is being made. Requirements are set out in the Infrastructure Delivery Plan (IDP).
Need to look at access to Park Royal Station	workshop	Noted. The link between Park Royal station and Park Royal industrial estate is identified as needing improvement in the Park Royal West place policy (P4). Beyond this, the Park Royal place policies also focus improvements on other key routes including the four primary routes that run through Park Royal and connect up the stations and the residential areas and meet at the neighbourhood centre. These improvements include enhancing the public realm, walking and cycling routes, lighting and wayfinding.
Retail and services could be focussed in Park Royal Centre but also in other locations in Park Royal.	workshop	Noted. The Park Royal Centre place policy does support additional town centre uses and services in order to meet the needs of the business and residential community. Additional retail development is also being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in these areas. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.
Question whether or not new bridges and tunnels would improve connections across Park Royal.	workshop	Noted. The Park Royal Transport Strategy and the separate Public Realm, Walking and Cycling Strategy identify the opportunities to improve the quality and function of the transport network for all users/modes, including the need for new connections across the OPDC area. Park Royal

		West place policy identifies the opportunity for a new link between Park Royal and Old Oak.
Clarification required on whether or not roads are adopted	workshop	Noted. Brent Council and Ealing Council are the local highway authorities with responsibilities for adopted roads in this area. Information on adopted roads in Park Royal would be held by these authorities.
If ASDA shut for redevelopment residents could cope in the meantime	workshop	Noted.
Support for development of First Central site	workshop	Noted.
First Central lacks social infrastructure and should be connected. There may be opportunity for shops to be located here to cater for local workers.	workshop, commonplace	Change proposed. The Local Plan supports mixed use development at First Central. The mix of uses include new employment and retail uses. An increase the range of services is being promoted so that the meet the needs of new and existing residents can be met.
There is nothing for employees in Park Royal, to entice them in	workshop	Noted. The Park Royal Centre place policy supports additional town centre uses and services in order to meet the needs of the business and residential community. Additional retail development is also being promoted at Park Royal Centre, First Central and Atlas Junction to increase the range of services available for local communities in these areas. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.
Businesses in Park Royal do not provide facilities.	workshop	Noted.
Suggest softening the industrial area for residents and workers	workshop	Noted.
The environment around Coronation Road would not be attractive to potential employers.	workshop	Noted. The Park Royal West place policy aims positively address this by supporting a range of improvements to Coronation Road as well as other key routes. These improvements include enhancing the public realm, embedding more green infrastructure, improving/creating the walking and cycling routes and better lighting and wayfinding.
The areas of Park	workshop	No change proposed. Further work has been

Royal north and south of A40 are very different from each other		undertaken to expand on the evidence base, including the completion of the Heritage Strategy and Character Study. This has helped to refine the place boundaries.
The area of Park Royal south of A40 has bad connectivity and reputation. Suggestion that it could be redeveloped	workshop	Noted.
There needs to be a delivery strategy for improvements to Park Royal, including how these would be funded.	workshop	No change proposed. The Delivery and Implementation chapter and Infrastructure Delivery Plan provide details on the requirements, phasing and funding of infrastructure.
Infrastructure and investment should be front loaded	workshop	Noted.
The number of existing cars in Park Royal should be reduced to minimise impacts of construction traffic	workshop	No change proposed. The Transport policies will ensure appropriate mitigation is secured to manage potential adverse impacts related to construction.
Highlighted area of Ealing whose interface into Park Royal is not good, better permeability is needed	workshop	Noted. The Park Royal Transport Strategy and the separate Public Realm, Walking and Cycling Strategy identify the opportunities to improve the quality and function of the movement network so that there are good connections for all users/modes across the area. There are significant constraints to increasing permeability and creating new connections around Park Royal due to the barriers created by the A40, A406 and railway lines. Therefore, the Park Royal places policies also seek to improve existing links to/from and over these infrastructure barriers.
Links with Imperial College and clean tech industries could mean new industries in the area.	workshop	Noted.
There is scope for a training institute	workshop	Noted.
Query whether low cost units will be protected.	workshop	The Employment policies (E1, E2 and E3) seek to ensure a mix of unit sizes, including small units, and low cost workspaces are provided.
Commercial property has not seen the growth rates that residential has seen	workshop	Noted.
Suggest removing permitted development rights	workshop	Noted. OPDC has already taken steps to pursue this as a course of action. In September 2016, OPDC gave notice of the making of a non-

for industrial change of use		immediate Article 4, which means a formal notice has been issued, to remove permitted development rights and to reintroduce the need for planning permission for the conversion of offices, storage or distribution centres to houses or flats within areas designated as Strategic Industrial Location (SIL) in OPDC's boundary.
Park Royal could be promoted as a place to live and work	workshop	Noted. The Local Plan policies support the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Location (SIL) boundary. Residential development is only being promoted on non-SIL sites including those in Park Royal Centre and around First Central and Brewery cluster.
Agree with early indicative capacity for the net additional homes and jobs	commonplace	Noted.
Do not agree with early indicative capacity for the net additional homes and jobs	commonplace	Noted. These targets have been updated in the Plan and are based on an understanding of the development potential of each site. These targets take into account the protection, strengthening and intensification of industrial uses within the Park Royal designated Strategic Industrial Location (SIL) boundary. Residential development is only being promoted on non-SIL sites including those in Park Royal Centre and around First Central and Brewery cluster.
Support SIL boundary changes	commonplace	Noted.
Cannot put additional housing and jobs in Park Royal without significant improvements to the infrastructure	commonplace	Noted. The Park Royal place policies acknowledge that a number of improvements are needed to support this development in this area.
There are some older industrial premises which could be reused.	Hammersmith and Fulham Historic Buildings Group	Noted. OPDC's Heritage Strategy identifies older industrial premises of heritage value and OPDC's heritage policy (D8) seeks to protect these premises.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Local Plan should make reference to the extant planning permission on the Twyford tip site	Ashia Centur Limited	No change proposed. The supporting text to Policy P4 notes that the site has extant planning permission. However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base indicates that, given the level of contamination and associated

		site clearance costs, an industrial use is likely to be the most deliverable end use and therefore it is proposed to remain designated as part of the Strategic Industrial Location (SIL).
Policy does not identify potential open spaces along the canal within Park Royal. Should prioritise delivering at least 10m either side of canal as open space.	The Inland Waterways Association-Middlesex Branch	No change proposed. Policy P4 already refers to improving green spaces along the canal and Policy P3 sets out detailed criteria for the entire length of the Grand Union Canal including opportunities for green infrastructure. As detailed in the Heritage Study, the character of the canal varies along its length, and from a heritage perspective, it is recommended that the diversity of different sections of the canal - as open or enclosed; vibrant or tranquil - is maintained as far as possible. Delivering 10m of open space either side would be inappropriate as it would not recognise this context. It could also undermine the protection of Park Royal SIL. The preparation of a new Conservation Area appraisal and associated guidance would provide a means to explore this in more detail.
Policy should be revised to better anticipate the evolution in London Plan policy on protecting industrial land supply and delivering the type of industrial development that is needed.	London Borough of Ealing	Change proposed. Policies E1 and E2 have been amended to reflect the updated position in the Economy section of the new Draft London Plan. New industrial site allocations have also been introduced to support industrial intensification in SIL, based on evidence in the Park Royal Intensification Study. Policies P4 and P5 now refer to these site allocations.
The policy lacks an appreciation of the existing spatial characteristics of the area, especially in patterns of use and size of premises.	London Borough of Ealing	No change proposed. The Place boundaries identified are based on the different spatial characteristics across the area.
Park Royal is a prime location for a demand responsive bus service incorporating the tube stations on the periphery	London Borough of Ealing	Noted. The Transport policies do not prohibit this type of bus service being delivered, but OPDC is not responsible for the delivery of this transport function and therefore cannot influence this through the Local Plan.
CAZ is leading location for London businesses. Should clarify that Park Royal is London's leading location for industrial business.	Mayor of London	Change proposed. The text has been amended to clarify Park Royal's status as an industrial location.
Any development proposal along the	DP9 (on behalf of A40 Data	Noted. This is already covered in SP9, P4, D2 and EU2.

length of Western Avenue should be required to deliver improvements to green infrastructure and frontages	Centre BV)	
There is a need for local hubs, supported by better wayfinding across the estate.	Park Royal Business Group	No change proposed. The provision of small scale 'walk to' services for industrial occupiers is covered in TCC1 and wayfinding is covered by T2 and T3.
New clusters should be identified at the area surrounding Harlesden and Stonebridge Park stations, with a vision promoting a range of uses assisting with a transition into Park Royal.	John Cox	No change proposed. The objectives to deliver intensification, positive and/or active frontages, a more attractive public realm, reduced car parking and the provision of small walk to uses outside of Park Royal Centre are considered in Local Plan policies (SP9, P4, P5, TCC1 and T4) and these would apply across the Park Royal area. OPDC will be preparing a Park Royal Supplementary Planning Document and this would provide an opportunity to set out more detailed guidance to support the implementation of the Local Plan.
Suggestion that areas identified for intensification should be highlighted in the plan.	John Cox	Change proposed. New industrial site allocations have been identified based on work undertaken as part of the Park Royal Intensification Study.
Support approach to tall buildings	Deloitte (on behalf of Mapletree Pte)	Noted.
The site known as the Twyford Tip West should be removed from SIL and identified as a site allocation in line with proposals in implemented planning permission. Policy text should reflect the implemented planning permission and land uses at the former Twyford Tip site.	Turley (on behalf of Ashia Centur Limited)	No change proposed. The supporting text to Policy P4 notes that the site has extant planning permission. However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use and therefore it is proposed to remain designated as part of the Strategic Industrial Location (SIL).
Support improvements in Policy P4	Turley (on behalf of Ashia Centur Limited); Hammersmith Society	Noted.
Park Royal area is not suitable for the application of Green Space Factor.	Friary Park Preservation Group	No change proposed. It is considered that all major development in the OPDC area should seek to maximise opportunities to increase urban greening and biodiversity. Further detail on how the urban greening factor will be applied will be included in an Environmental Standards SPD.

Policy is sound	Friary Park Preservation Group	Noted.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Twyford Tip has extant planning permission. The consented uses in themselves are compatible with neighbouring sites which are designated as SIL and would not prejudice the successful operation of these neighbouring SIL sites. The site should be removed from the proposed Strategic Industrial Land (SIL) designation and should be identified as a site allocation suitable for a mix of uses.	Ashia Centur Limited	No change proposed. The supporting text to Policy P4 notes that the site has extant planning permission. However, works have not progressed and there does not appear to have been any site clearance works and no buildings have been erected. OPDC's evidence base indicates that, given the level of contamination and associated site clearance costs, an industrial use is likely to be the most deliverable end use and therefore it is proposed to remain designated as part of the Strategic Industrial Location (SIL). Currently the site is not considered to be deliverable or developable in the Local Plan period and is therefore not identified as a site allocation.
Policy P4 ignores the need to improve areas around Harlesden and Stonebridge stations.	John Cox	No change proposed. The objective to deliver intensification, positive and/or active frontages, a more attractive public realm, reduced car parking and the provision of small walk to uses outside of Park Royal Centre are considered in Local Plan policies (SP9, P4, P5, TCC1 and T4) and these would apply across the Park Royal area. OPDC will be preparing a Park Royal Supplementary Planning Document and this would provide an opportunity to set out more detailed guidance to support the implementation of the Local Plan.
Support vision of Park Royal as a leading location for industrial businesses.	Mayor of London; Aberdeen Standard Investments; DP9	Noted.
Policy P4 on heritage and character is inadequate; it does	Nye Jones; Gail Robinson; Rachel Ritfield;	No change proposed. Local Plan policies SP9, D4, D5 and D6 with London Plan policies and national guidance will be used to ensure existing

not discuss ways that the Wesley Estate could be enhanced and protected with a buffer area given the increased SIL development planned around it which is disappointing.	Ciara Solmi; Bernie Timmins; Jane Dreaper; M.Szoke; James Trew; Eileen Hannington; Marta Donaghey; Jamie Sutcliffe; TITRA; Pablo Navarrette; Midland Terrace Residents; Mark Walker; Jason Salkey; David Turner; Nicky Guymer; Elaine Gristock	residential areas benefit from appropriate standards of amenity. Policy D8 provides a clear sequential approach for how the historic significance of the Wesley Estate, as proposed non-designated heritage asset, would be conserved and enhanced.
There is no significant new provision of open space in Park Royal. It is unfortunate the only improvements to this open space indicated in the Park Royal Development Framework Principles are “improved connections to the canal”. The space offered by the existing waterway should be enlarged and enhanced to form the green-blue backbone of the development.	The Inland Waterways Association	No change proposed. Development proposals will be required to contribute to or deliver new or improved open space, including new open spaces in Park Royal Centre identified in Policy P6. Policy P4 already refers to improving green spaces along the canal and Policy P3 sets out detailed criteria for the entire length of the Grand Union Canal including opportunities for green infrastructure. As detailed in the Heritage Study, the character of the canal varies along its length, and from a heritage perspective, it is recommended that the diversity of different sections of the canal - as open or enclosed; vibrant or tranquil - is maintained as far as possible. An approach to delivering open space either side would be inappropriate as it would not recognise this context and could also undermine the protection of Park Royal SIL. The preparation of a new Grand Union Canal Conservation Area appraisal and associated guidance would provide a means to explore this in more detail.
Welcome the amendment which recognises the need for contributions towards and/or delivery of enhanced bus infrastructure to support existing and planned bus services. It may also be necessary to provide direct financial support to new or	Transport for London	No change proposed. Local Plan policy T6 (Buses) already refers to the need for development proposals to facilitate, deliver and contribute to the existing and future bus network. Policy T6 applies to the whole OPDC area, including Park Royal.

improved bus services that provide additional capacity or new connectivity. This should be made clear in the policy and supporting text.		
Remove policy reference to a jobs target within Park Royal West, or the Park Royal SIL. SIL should be allowed to come forward unfettered in accordance with market conditions, without being overburdened by unnecessary jobs targets.	Aberdeen Standard Investments	No change proposed. The jobs figures are indicative (not maximum) targets but they do provide an indication of the number of jobs that could be delivered over the plan period. However, Policies SP5 and E1 are clear that development within SIL should help contribute towards meeting the strategic target of 40,400 new jobs. SP1 and E1 set clear priorities for SIL in seeking to protect, strengthen and intensify it in order to ensure the delivery of additional floorspace as well as new jobs.
Support increased building heights where this will deliver industrial intensification and SIL compliant broad industrial type activities. This will allow other policy requirements, such as providing a range of unit sizes, to be accorded with i.e. through the stacking of units.	Aberdeen Standard Investments	Noted.
All sites should be required to demonstrate that they have considered the opportunity to intensify their use of land, not just those allocated in the Intensification Study.	DP9; Aberdeen Standard Investments	No change proposed. Policy P4 needs to be read in conjunction with E1. Both P4 and E1 make it clear that intensification should be considered on all sites in SIL and development should be comprised of uses suitable for broad industrial type activities. If intensification is not feasible, this should be demonstrated by the applicant as clarified by supporting text for Policy E1.
Should plan for a permanent facility within Park Royal for skills and training College(s) of Further	Grand Union Alliance	No change proposed. OPDC's Local Plan supports new social infrastructure, including education facilities, in appropriate locations in line with TCC4. Policy E5 requires a Local Labour Skills and Employment Strategy and Management

Education. This would assist in 'gearing up' the workforce.		Plan (LLSESMP) to be provided for major development proposals. A LLSESMP would include detailed information on jobs, skills, supply chain and mitigation. New, on site skill straining centres could be delivered as part of implementing a LLSESMP, if that was considered appropriate.
The local boroughs have the mechanisms to draw down resources and implement through their Highway Authority role and the Local Implementation Plans. Therefore, the OPDC's proposed interventions have not the required level of certainty as to delivery.	Grand Union Alliance	No change proposed. OPDC will be working closely with the boroughs and relevant Highway Authorities to deliver the policies set out in the Local Plan.
It is questionable if the improvement ambitions can then be met through a reliance on S106 given that use of this is heavily restricted.	Grand Union Alliance	No change proposed. Policy DI1 outlines a number of mechanisms to support the successful regeneration of the area, this includes potential alternative funding and financing options.
Pavements particularly are of poor quality and need to be designed with accessibility and inclusion in mind (in respect of disabled and older people and those with young children and buggies in mind).	Grand Union Alliance	Noted. Policies D2, T1 and T2 provide guidance to deliver high quality public realm and walking infrastructure.
Corridors should be subject to enhancement and development proposals; for example, the approach to Park Royal from Harlesden along Acton Lane, where a significant development	Grand Union Alliance	No change proposed. The objective to improve key routes in Park Royal is considered in Local Plan policies P4, P5 and P6. OPDC will be preparing a Park Royal Supplementary Planning Document and this would provide an opportunity to set out more detailed guidance to support the implementation of the Local Plan. Based on the submitted information to the previous Call for Sites consultation, the site is considered to be appropriate for assessment for potential development within the Development Capacity

opportunity is the Acton Lane frontage to McVities factory.		Study (DCS). The DCS assessed this site for development potential. This is set out in Appendix A of the Development Capacity Study. This assessment identified that the site is currently not available for development. Availability will be subject to future engagement and detailed work. Should the site become available, development for uses suitable for broad industrial type activities would be appropriate.
Clusters should be designated around Harlesden and Stonebridge Stations, as has been done for P4C1 Brewery Cluster.	Grand Union Alliance	No change proposed. Cluster policies within the Local Plan are considered necessary to provide extra policy detail at the points in the area where most activity is likely to occur. Currently the locations adjacent to Harlesden and Stonebridge within the OPDC area have limited development potential. The objective to deliver intensification, positive and/or active frontages, a more attractive public realm, reduced car parking and the provision of small walk to uses outside of Park Royal Centre are considered in Local Plan policies (SP9, P4, P5, P6, TCC1 and T4) and these would apply across the Park Royal area. OPDC will be preparing a Park Royal Supplementary Planning Document and this would provide an opportunity to set out more detailed guidance to support the implementation of the Local Plan.
Wesley Estate is isolated and distant from community supporting facilities and area should be served by a more direct bus route to North Acton Station and beyond.	Grand Union Alliance	No change proposed. Policy P6 supports a range of new town centre floorspace and uses (i.e. shops, services and food and drink uses) and D uses (such as community facilities) which should better support local residents and workers.
Residential above industrial uses in Park Royal should be delivered.	Central Acton Neighbourhood Forum	No change proposed. The Industrial Land Review sets out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, loss of industrial land across London and the ongoing demand for industrial space. The proliferation of non SIL uses within SIL would undermine the functioning of existing and future industrial uses. Detailed changes to the SIL boundary have been assessed in the Industrial Land Review Addendum.
The strengthening and intensification of Park Royal is	Grand Union Alliance	Noted. Policies SP5, P4, P5 and P6 provide guidance for strengthening and intensifying Park Royal including the expansion of the

supported. Supporting uses could be provided along a linear high street or next to Central Middlesex Hospital		neighbourhood town centre at Park Royal Centre.
Traffic is a key concern as it is unlikely that people will walk or cycle.	Wesley Estate Residents Association	No change proposed. The Park Royal Place and Transport policies prioritise sustainable transport modes which includes walking and cycling but also the use of public transport. Policy T1 includes provision for improvements to existing streets as well as outlining standards for new streets and roads. OPDC's aspiration is for existing traffic issues to be addressed through a variety of measures outlined in the supporting text and included within OPDC's Infrastructure Delivery Plan.
There are problems with car parking. Business parking overspills onto residential streets. Loss of parking and/or increased pressure on road space may result in increased parking displacement to the Wesley Estate.	Wesley Estate Residents Association; Grand Union Alliance	Noted. OPDC will work with the local highway authorities to investigate, consult on and implement CPZs.
Residential amenity needs to be considered including overlooking, noise, odour and disruption.	Wesley Estate Residents Association	No change proposed. Local Plan policies SP9, D4, D5, D6, EU4 and EU5 with London Plan policies and national guidance will be used to ensure existing residential areas benefit from appropriate standards of amenity.
Affordable community commercial space, e.g. artist studios and workshops, should be included in the mix within Park Royal.	Thomas Dyton; Wells House Road Residents Association	Noted. Affordable workspace and/or shared workspace and/or small business units will be sought in accordance with Policy E3. This policy would be applied across the OPDC area, including Park Royal.
Require community spaces and facilities – including meanwhile spaces and play areas for children.	Thomas Dyton; Wells House Road Residents Association	Noted. Development proposals will be required to provide or make appropriate contributions to ensure the delivery of play space and social infrastructure in accordance with Policy D9 and TCC4. The Social Infrastructure Needs Study identifies infrastructure requirements for and the demands on delivery of social infrastructure, including schools, across the area taking into

		account projected growth over the plan period. Policy TCC9 supports meanwhile uses which meet certain criteria.
Welcome amended wording that clarifies the need for improvements to the walking and cycling links to Park Royal and Hanger Lane stations.	Transport for London	Noted.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
A40 Study	The study provides an overview of the long-term investment options for the A40 corridor and draws some key conclusions and next steps: • Important to maintain A40 as key 'arterial' corridor into London with improvement required at key junctions including Hanger Lane as a priority. This could involve a tunnel or a major new junctions scheme. • Focus on junction solutions east of Hanger lane to support bus and cycle access across the A40 • Continue to deliver schemes such as lane width improvements at Hanger Lane which improve journey time reliability (including for buses). • Promote Smart Road management on the A40 to improve traffic management and journey time reliability from 2020 • Work with HS2 on short-term traffic mitigation schemes at A40 junctions • Develop a strategic business case for Hanger Lane • Identify longer term solutions for Savoy Circus and Gypsy Corner in line with the Healthy Streets indicators.
Air Quality Study	• Adopt a wide range of measures and policies to mitigate against threats to air quality and ensure air quality is comprehensively monitored and assessed when individual developments are proposed. • Manage new development so that it does not add extra emissions to the area. • The area is suitable for declaration as a TfL Low Emissions Neighbourhood. • Adopt policies to minimise travel by private vehicle and encourage transport by low emission modes (walking, cycling and public transport). • Adopt innovative solutions to avoid emissions including consolidation of freight and use of clean freight vehicles. • Support extension of Ultra Low Emissions Zone (ULEZ). • Require development to meet the tightest emissions for on-site plant.

	• Adopt full enclosure of waste sites in line with Environment Agency guidance. • Plan construction activity in detail to minimise dust emissions and adopt highest standards for emissions from all plant and vehicles during construction.
Development Capacity Study	• Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore

	should be retained or reflected as part of any future development.
Industrial Estates Study	Recommendations for how Park Royal can improve its competitive position, including: • protecting industrial land; • ensuring a greater diversity of unit sizes; • addressing infrastructure issues; and • improving access to amenities.
Industrial Land Review	The recommendations for policy and delivery focus on protecting and maximising the contribution of industrial uses in the OPDC area to support a robust local and regional economy. They are divided into four overarching groups to address the conclusions of the report: *Protect* – acknowledges the high demand for industrial land in the OPDC by focusing on how local planning policies should protect industrial land and industrial businesses within Park Royal. • Protect industrial uses in Park Royal SIL • Reduce non-conforming uses in Park Royal SIL • Return Park Royal HS2 construction sites to SIL • Development adjacent to Park Royal SIL *Intensify* - focuses on planning policies to use the remaining industrial land efficiently and provide industrial space to more businesses. • Efficient use of industrial land • Reduce road congestion • Intensification pilot projects *Expand* – recommends options for the Local Plan and broader strategies to expand the supply of industrial space in the area in response to increasing demand. • Adjust Park Royal SIL boundary • Light industrial floor space in Old Oak • Manage industrial floorspace within the region • Industrial space design and planning guidance *Support* - focuses on how the OPDC can support the local industrial economy and businesses by facilitating the relocation of displaced businesses within the area and supporting businesses to capture procurement opportunities from development at Old Oak. • Business relocation • Low carbon transition • Local procurement • Business listing and online forum
Park Royal Atlas	• There are a diverse range of businesses in the area • At the time of the survey, 19,934 active workspaces were identified. • A broad range of business sectors were identified, including breweries, bakeries, metal workshops, storage, contractors, joiners, hospitals, schools, publishers, film studios, software developers, garages, car sales, pubs, hotels, jewellers, cobblers, lawyers, accountants, spice merchants, medical suppliers, churches and artist studios. • 30% of workplaces are small office type spaces, though

	workplaces in large warehouses make up 63% of the total floor area. • The central areas of Park Royal stand out for having the greatest diversity of buildings and space types. Many of these are used by micro businesses which count for 75% of workplaces
Park Royal Development Framework Principles	• Park Royal Centre has the capacity to deliver 650 homes, 1,400 jobs and 3,000sqm of A-class uses but through an optimised approach, these targets could be significantly exceeded. • The town centre boundary requires revisions to accommodate required town centre use needs and support place-making. • The junction within the heart of Park Royal Centre should be re-aligned to optimise transport movement • The routes into Park Royal Centre require improvement for walking and cycling. The delivery of an alternative cycling route off the key routes should be explored. • There is an opportunity to deliver significantly enhanced public open space provision in the centre, particularly on the Central Middlesex Hospital site if existing bus routes can be rationalised.
Park Royal Intensification Study	There are a number of sites and locations across Park Royal where there may be opportunities for intensification, including through: • Vertical extension • Horizontal extension • Infill • Internal subdivision • New provision on vacant land • Comprehensive redevelopment
Park Royal Transport Study	Emerging recommendations include providing transport networks that enhance the communities they serve and help local business to operate and grow sustainably, both now and in the future.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.
Sites of Importance for Nature Conservation Statement	• OPDC will utilise the Boroughs evidence base to designate SINCs as part of the Local Plan. This will result in no change to current SINC designations from existing Planning Policy. • The OPDC intends to undertake further work through a Green Infrastructure Study and Biodiversity Action Plan to create a long-term strategy for the enhancement of existing, and creation of new, areas of biodiversity value as part of the wider master plan for future development within Old Oak and Park Royal.
The Land at Abbey Road Development Options Appraisal Report	That the Land at Abbey Road site should be retained as SIL as industrial use is likely to be the most deliverable end use.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Industrial Land Review	• Adjust Park Royal SIL boundary around Park Royal Centre	OPDC commissioned a Park Royal Development Framework Principles supporting study in February 2018. This

		has sought to reconcile issues or recommendations related to Park Royal Centre that are currently spread across a number of the Local Plan supporting studies, including the Industrial Land Review and Retail and Leisure Needs Study. The outputs from this work include an assessment of suitable sites for expansion of the town centre and, as a result, a revised town centre/SIL boundary.

Other evidence base

Supporting Study	Recommendations
London Industrial Land Demand (2017)	Update Industrial Land release benchmarks suggest that for the period 2016-41 a total of 233 ha of industrial land can be released, or an average of 9.3 ha per annum. This is a significantly lower level of release than set out in the 2011 Industrial Land Benchmark study and can be explained by industrial land being released at faster than the benchmark guidance and by the fact that the current GLA projections show industrial employment in London declining at a much slower rate than those which informed the 2011 study. This implies much tighter policy is needed if industrial land releases are to be restricted to the Benchmark targets. If industrial land were to continue to be released at the same rate as in recent years then this would result in the loss of 1,630 ha on industrial land. There is already planned release of 838 ha of industrial land in the pipeline and if land identified for Crossrail 2 and the Bakerloo Line Extension were factored in this would rise to 1,277 ha. There is potential for the Benchmark release total to be raised through a combination of intensification, substitution and co-location of industrial activity. Our Intensification and Substitution scenario estimated that the Benchmark Release total could be increased from 233 ha to 783 ha if such approaches could be successfully implemented. Given the considerable tightening of the industrial land market in London the current categorisation of Boroughs into Managed, Limited and Restrictive should be revisited. Boroughs should seek to create additional capacity for industrial activity through intensification. This should apply to all Boroughs and in particular to those which are identified as having a positive net demand. Providing capacity does not necessarily mean providing additional land for industrial activity. It can be achieved through intensification of use, providing more capacity for industrial activity on the same site area. This applies equally to those Boroughs that seek release above the benchmark levels. This can be justified if it can be shown that additional capacity for industrial activity has been created through intensification.

	Secondly Boroughs need to work together and consider industrial demand at the level of their sub-regional property market area. Where one Borough has a positive demand for industrial land and a neighbouring Borough has a surplus of land to release, then there should be some reallocation between Boroughs to ensure demand is met at the property market level. Thirdly there may be some limited scope for demand to be met by transfers between property market areas. As noted in the report there are some signs that occupiers and developers who would previously only consider west London locations are now looking to the east. But any reallocations between Boroughs need to be included in both Borough's plans to ensure demand is met at the London level. Other policy recommendations: *Public Sector Enabling Role* A principal objective of industrial land policy in London, as set out above, should be to encourage intensification of use. There are signs that new innovative and more intensive forms of industrial development are emerging – and these should be promoted through policy. But there may be barriers that may limit the level of intensification that is delivered through the market alone. Many industrial estates have highly fragmented ownership patterns that hinder the type of comprehensive redevelopment that is needed to optimise industrial land use density on a site. Industrial developers may also lack the incentive to redevelop more intensively on a site by site basis as the full value of intensification (in terms of land released for non-industrial development) may not accrue to industrial developers. The public sector may therefore need to intervene in the land assembly process to ensure that the potential benefits that could be realised through intensification are actually realised. *Strengthen Policy and Release Guidance* The stock of industrial land in London is shrinking rapidly and existing policy does not seem to be controlling releases to benchmark levels. The 2011 Industrial Land Demand report recommended improving monitoring to ensure releases were not in excess of Benchmarks. That release has continued well in excess of benchmark guidance suggests this cannot be just down to poor monitoring. There therefore needs to be a strengthening of policy and a commitment from both the GLA and Boroughs at the highest level to ensure that the Benchmark Release guidance, with flexibility to allow for intensification, is actually adhered to. *Article 4* Local planning authorities are required to plan for "The locational and premises requirements of particular types of business". But it is increasingly difficult for local authorities to meet this requirement as the supply and range of premises is eroded by permitted development rights for change of use. Boroughs should therefore give consideration to the use of Article 4 Directions to preserve B1a, B1c and B8 from being changed to residential use. This is necessary to maintain

London Industrial Land Supply and Economy Study (2015)	Key results and findings include: *Industrial Land Baseline* • In 2015 there is 6,976 hectares (ha) of industrial land in London of which 4,553ha is core industrial use (65%); 1,887ha is in wider industrial use (27%) and 547ha is vacant land (8%). There was approximately 21 million m2 of industrial floorspace in London in 2012. • From 8,282ha recorded in 2001, the stock of industrial land has declined steadily to 7,841ha in 2006, 7,505 in 2010 and 6,976ha in 2015; This equates to a contraction of 1,306ha or 16% over the whole period and a 7% contraction in the last five years. • Notably, at sub-regional level the Central subregion recorded a significantly higher rate of release of / decline in industrial land in the last five years at 25% compared with the other subregions which recorded declines of around 6% in each case. • The development pipeline and proposed future release rates of industrial land appear to correspond with recent London-wide trend rates of release, suggesting that these rates will persist in future years. • Past trends in industrial land release show an accelerated rate of release significantly above the SPG target rates of release. The trend rate of release for 2010 to 2015 is 105ha per annum, compared with the SPG recommended rate of release of 36.6ha per annum. If these trends continue then the total stock of industrial land in London will decline from around 6,980ha in 2015 by a further 2,300ha to around 4,700ha in 2041, a 33% decline over this period. This is around 1,900ha more than the SPG 2031 industrial land target projected to 2041 (around 6,500ha). *Businesses and Employment* • Employment in industrial occupations in London was estimated at 560,000 jobs in 2014, 46% of which are in designated areas, with 76,000 industrial businesses being recorded. At 7.4 workers per business and with 90% of businesses employing 0-9 people, such a distribution is found to be similar to the distribution for all businesses in London. • It's estimated that 82% of all industrial businesses lie within designated areas, suggesting that either the size of industrial businesses in non-designated areas is significantly larger than in the designated areas and / or there are inaccuracies over the way that industrial employment is calculated. This would benefit from further investigation. • Industrial employment in London in the period 2010 to 2015 is estimated to have increased by around 4%, which could represent a reversal of the longer-term trend of decline in industrial employment. Property Market Areas and indicators • Of the approximately 21 million m2 of industrial floorspace in London in 2012, the Park Royal / A40 / Heathrow market contains the highest proportion at 32%. • Available industrial floorspace (2 million m2) represents 10% of total estimated floorspace, exceeding the widely accepted guideline frictional vacancy rate of 8% for effective operation of the market. The availability rate in Outer London also exceeds this at around 12%, with the Thames Gateway recording the highest rate of the property

	market areas at 14%. • London-wide industrial rental values average £110 per m2, peaking at an average of £123 per m2 in the Park Royal / A40 / Heathrow and Wandle Valley areas and falling to £91 per m2 in the Thames Gateway. • Industrial land values average £4.9m per ha London-wide, with the Wandle Valley having the highest average industrial property values at around £6.2m per ha. Reflecting rents, the Thames Gateway has the lowest at £1.0m per ha (£2.5 per acre). Residential land values reflect a similar pattern to that of industrial with the highest values in the South and West subregions / property market areas and lowest in the East and North. By property market, residential land values range from between 2.6 to 7.6 times industrial land values (Park Royal / A40 / Heathrow and Central Services Circle respectively) which means that there is considerable market pressure to release industrial land for residential development. Industrial Capacity in the Inner South East • The supply of industrial land in the inner South East is estimated to be around 4,882ha, or, in comparison, 70% of the total industrial land supply of London. The largest concentration of land is in the north quadrant, while the largest in London is in the Park Royal / A40 / Heathrow property market. • The rate of industrial land loss in the inner South East is slower than that seen in London. Release of industrial land has been slowest in the inner South East quadrants that are adjacent to the London property markets which have the highest rates. 173 • This could indicate that a process of out migration is occurring with businesses moving from London to locations in the inner South East. This is further represented by the large difference in the total rates of industrial land stock release for the inner South East (-4%) and for London (-16%) *Evidence on Market Failure and Flexibility* Research and conclusions on possible factors that could cause market failure and / or affect the flexibility and ability of industrial businesses to respond to a reduced supply of industrial land are as follows: • Generally there does not appear to be strong evidence so far to suggest that reductions in availability of land and property have a direct correlation with increases in rents at a local level. • Case studies suggest that at a local level significant shifts to non-industrial uses can undermine the integrity of industrial areas, and care is needed in planning for and managing change in industrial areas. • There is some evidence to suggest that industrial activities are responding to increased rents and reduced supply by increasing employment densities. • Analysis of changes in employment in recent years in industrial sectors suggests that there could be an emerging pattern of sectors that are more sensitive to London and / or central London locations tending to remain or grow in London, and other sectors that are less sensitive to location will tend to leave London. • In particular it is possible that the scale of a number of industrial activities will tend to be correlated to London's overall population as they directly serve the population.

		• Data on rates of change of industrial businesses in London suggests that there is a degree of flexibility in the economy and the industrial sector specifically that may not have been appreciated previously. • Broad-brush analysis suggests that overall there is potential for the adjacent South East region to (continue to) accommodate overspill demand from London (or demand transferring to the area as supply contracts in London). • It is likely that if activities servicing core London markets are forced to relocate out of London, either to the adjacent South East or further afield, then total travel miles, congestion and consequent carbon emissions will increase. • There is evidence that some industrial businesses require space for small-scale production and prototyping and rely on access to a skilled workforce, specialist manufacturing activities and agglomeration benefits found in London. These businesses may find it harder to be economically viable if forced to relocate outside London. 8.3.2 The research carried out for this report, together with other data and information, suggests that overall there is a degree of flexibility in the industrial land market and industrial activities to respond to contractions in industrial land supply. Key mechanisms allowing this include potential for some industry to relocate to the wider adjacent South East (or in suitable cases further afield) and probably to a lesser degree there may be potential for intensification of industrial activities on existing land. *Implications for Industrial Land Policy* Review of context, market failure and market mechanisms suggests that if sufficient industrial land can be provided / protected within and around London continued release of industrial land in London may be possible. However the rates of release seen over the last five years appear to be excessive and a more moderate rate of release is probably more appropriate. London appears to be heading towards a situation in which most of its activities located in industrial areas will be associated with servicing the rest of London's economy and population. With the projected significant growth in London's population and economy over coming decades and the likely strong positive correlation between these activities and London's population it appears likely that at some point, potentially within the life of the current London Plan, there will be a case to switch from releasing industrial land to retaining most of the remaining land. Whether such a shift is appropriate will depend upon the strategic value placed upon these activities. Care is needed at a local level to be clear on what industry is being protected and to ensure that policies are sufficiently robust and unambiguous, and then are protected with vigour, to reduce the potential for blight, hope values and issues over bad neighbour activities with other sensitive land uses damaging industrial activities and viability.
London	Industrial	Summarises the main forms intensification can take, with case

Intensification Primer (2017)	study examples. While some of the options presented are fairly straight forward, and some are possible with greater attention to detail, others will be more challenging, in terms of economic viability and deliverability, as well as ensuring the quality of industrial and residential space. In many cases intensification will have to be considered at the masterplan level as well as the level of individual developments. The document also suggests some typical basic specifications for large and small industrial units to ensure that any intensified or mixed space is suitable for industrial occupiers.
LLDC Employment Space Study (2015)	Providing a framework and examples of how employment provision can be designed.

P4C1. BREWERY CLUSTER

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe

	buildings can be designed so as to facilitate different access arrangements at different times.
Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	In development plans: The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas

	2) Support development which creates employment opportunities and housing choice for Londoners 3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character

	5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate. This SPG contains further information on defining the extent of a place and dealing with boundaries and edges in chapters 5 and 6.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE L2: PARK ROYAL	Park Royal performs a vital role in supporting the London economy. Building on the area's existing success there is a fantastic opportunity for Park Royal to become the UK's leading industrial location. Park Royal could establish itself as a globally recognised centre for developing innovations such as smart and clean-tech industries. There are also opportunities to attract growing businesses from Imperial College Campus into Park Royal. This can be achieved by; continuing to protect Park Royal as a Strategic Industrial Location (SIL); identifying interventions to improve transport and utility (including connectivity) infrastructure; managing impacts generated during and after the redevelopment of Old Oak; and developing planning and design policies that encourage development that makes more efficient use of land and that works to attract different sectors to the area through the OPDC Local Plan. Today Park Royal houses approximately 1,200 workspaces, employing over 30,000 people in over 2.3 million square metres of gross floor area. The area's historical development has seen changes in the types and form of businesses. During the life of this plan there is a need to improve the operation of the estate and where possible to intensify uses to cater for up to 10,000 new jobs. Given the timescales involved what is most important now is the development of a place that functions well, and which is an attractive business location. Whilst there may be opportunities to support and promote the location of specific business sectors, it is important to retain flexibility to ensure Park Royal can evolve to changing market demands in a timely manner. Park Royal could also play a valuable role in accommodating displaced

	employment floorspace and businesses from Old Oak. Outside of SIL, development should be more mixed use, and should look to deliver a minimum of 1,500 homes. In the centre of Park Royal, the existing retail centre should be enhanced and expanded so that it can become a local hub for residents and businesses in Park Royal to include business support services and uses such as meeting spaces and business hotels. The existing character of the Wesley Estate and the nearby playing fields should be enhanced with the Heart of Park Royal reinvigorated to provide a range of services for local communities.
PR1: Land Use	a. The GLA will continue to support Park Royal as London's leading industrial area by: • protecting existing Strategic Industrial Locations (SIL); and • promoting development and intensification on SIL land. b. New employment proposals in Strategic Industrial Locations should: • deliver new workspace that maximises and intensifies the use of the site to support delivery of 10,000 new jobs in Park Royal and where possible accommodate business relocations from elsewhere in the OAPF area. • deliver new employment workspace that meets identified needs for micro, small and medium enterprises and studios with higher employment densities in locations within easy walking distance to public transport services and/or town centres and elsewhere for larger enterprises with lower employment densities. c. support the delivery of nationally significant railway infrastructure. d. New residential uses should be directed to non SIL, including the First Central site where they can be delivered so as not to impact on the functioning of surrounding SIL; f. Within the First Central site, proposals for office and residential floorspace and ancillary retail, health and leisure facilities will be supported where they: • improve walking, cycling and public transport access to Park Royal London Underground Station; • improve walking and cycling to the existing residential areas to the north; and • enhance the adjacent wildlife corridor to the south-west. g. Within the existing residential area of the Wesley Estate and the adjacent Wesley Playing Fields, proposals which support the existing residential character, improve the quality of the public realm and Wesley Playing Fields and improve walking and cycling routes to and from these locations and the Grand Union Canal will be supported.
PR2: Infrastructure	a. Proposals should seek to improve transport and utilities infrastructure. b. Improvements to: • the road network should be undertaken across Park Royal, OPDC is currently progressing a Park Royal Transport Study with TfL and the Park Royal Business Group. This work should identify recommendations for improvements to the transport network. This may recommend improvements along the four main roads of Abbey Road, Acton Lane, Park Royal Road and Coronation Road and at junctions with the North Circular Road (A406), Western Avenue (A40) and Old Oak Lane (A4000); and • the walking and cycling network should be focussed along the routes shown in figure 72. c. Proposals for employment floorspace should demonstrate how they will maximise the use of sustainable transport modes and facilities for freight movement.

<table>
<tr><td>PR3: Streets & Public Realm</td><td>Proposals should:
a. deliver a safe, permeable and legible movement network in accordance with figure 72;
b. Improve streets and create a public realm that enhances local connectivity across Park Royal and to surrounding neighbourhoods;
c. encourage the location of offices and smaller business spaces along the street front to deliver activity along the ground floor and above across Park Royal including the Grand Union Canal, where feasible;
d. utilise a coordinated palette of high quality durable materials and street furniture to support Park Royal's role and reflect and improve its local character; and
e. support the coordinated management of the public realm.</td></tr>
<tr><td>PR4: Public Amenity Space</td><td>Proposals should accord with Principle D1 and London Plan Policy 7.18 to deliver:
<table>
<tr><td>Name</td><td colspan="2">Location</td><td>Guidance</td></tr>
<tr><td>b.</td><td>Other small amenity spaces</td><td>Located across Park Royal</td><td>These new public amenity spaces should be delivered with stakeholders to deliver a high quality working environment.</td></tr>
<tr><td>c.</td><td colspan="3">Improvements to existing public amenity spaces such as Wesley Playing Fields and canal side spaces would be encouraged and supported.</td></tr>
</table></td></tr>
<tr><td>PR5: Building Height & Density</td><td>New building heights should accord with the guidance set out in the table below and depicted in figure 45:
<table>
<tr><td colspan="2">Location</td><td colspan="2">Guidance</td></tr>
<tr><td>b.</td><td>First Central</td><td>Highest</td><td>A taller building could be located closest to Park Royal tube station and the A40. Any tall building proposals would be subject to a detailed design analysis, would need to accord with London Plan policies 7.6 and 7.7. and would need to be enable delivery of a fully accessible public space and route through the site.</td></tr>
</table></td></tr>
</table>

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	**Alternative Policy Option**
The Regulation 18 Local Plan did not include cluster policies.	

Key Consultation Issues

Regulation 18 consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
N/A. Brewery Cluster was not identified in the Regulation 18 Local Plan.		

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Twyford Abbey Road site was identified as a development site in the Reg 18 Local Plan, but it has not been in the Reg 19 Local Plan and it should be. It should be identified for residential development	Diageo Plc	No change proposed. The site is a designated open space delivered as part of an earlier phase of development at First Central. The open space is of good quality and provides green space, recreation and play space. OPDC does not consider it appropriate to allocate this site for redevelopment through the Local Plan. It is part of a larger coherent public open space of over 2ha in size, constituting a 'local park' as defined in the Mayor's London Plan. Any loss of this open space would need to accord with the requirements of policy EU1, and provide equivalent or better open space in terms of its quantity, quality and function.
Lakeside Drive site is difficult to deliver and could instead be used to off-set lost recreational uses from the Twyford Abbey Road site	Diageo Plc	No change proposed. The Lakeside Drive site ranges in width from 19 metres to 22 metres and is considered to be of sufficient width to provide a range of development typologies and to be deliverable. OPDC does not consider it appropriate or necessary through the Local Plan to designate the site as an open space to offset the loss of public open space elsewhere. In accordance with Policy EU1, if a loss of open space was proposed through a planning application then any replacement open space must provide equivalent or better open space in terms of its quantity, quality and function.
P4C1 should be amended to give greater flexibility and allow the market to direct the preferred use of the Diageo site.	Deloitte (on behalf of Mapletree Pte)	Change proposed. Policy E2 has been amended to protect employment uses outside of SIL unless certain criteria are met. The merits of each proposal would be assessed on a case by case basis. Policy P4C1 and the associated supporting text already provide flexibility in terms of the broad mix of uses that might be appropriate within this area.
Supports Figure 4.26 showing site as residential but location of active/positive frontages is too prescriptive.	Deloitte (on behalf of Mapletree Pte)	No change proposed. Policy P4C1 allows for changes over time by including a range of locations for active frontages and Policies SP9 and D2 seeks to maximise the use of active/positive frontages. These policies are considered to provide sufficient flexibility to accommodate change but also provide a necessary amount of detail to ensure the delivery of high quality development.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?

Specific comments were not provided on this policy.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
A40 Study	The study provides an overview of the long-term investment options for the A40 corridor and draws some key conclusions and next steps: • Important to maintain A40 as key 'arterial' corridor into London with improvement required at key junctions including Hanger Lane as a priority. This could involve a tunnel or a major new junctions scheme. • Focus on junction solutions east of Hanger lane to support bus and cycle access across the A40 • Continue to deliver schemes such as lane width improvements at Hanger Lane which improve journey time reliability (including for buses). • Promote Smart Road management on the A40 to improve traffic management and journey time reliability from 2020 • Work with HS2 on short-term traffic mitigation schemes at A40 junctions • Develop a strategic business case for Hanger Lane • Identify longer term solutions for Savoy Circus and Gypsy Corner in line with the Healthy Streets indicators.
Air Quality Study	• Adopt a wide range of measures and policies to mitigate against threats to air quality and ensure air quality is comprehensively monitored and assessed when individual developments are proposed. • Manage new development so that it does not add extra emissions to the area. • The area is suitable for declaration as a TfL Low Emissions Neighbourhood. • Adopt policies to minimise travel by private vehicle and encourage transport by low emission modes (walking, cycling and public transport). • Adopt innovative solutions to avoid emissions including consolidation of freight and use of clean freight vehicles. • Support extension of Ultra Low Emissions Zone (ULEZ). • Require development to meet the tightest emissions for on-site plant. • Adopt full enclosure of waste sites in line with Environment Agency guidance. • Plan construction activity in detail to minimise dust emissions and adopt highest standards for emissions from all plant and vehicles during construction.
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in

	Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations
Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including: • 5 broad historic themes: o Grand Union Canal; o Rail heritage; o Industrial heritage; o Residential enclaves; and o Scrubland and open space. • a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets. • heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.
Industrial Estates Study	Recommendations for how Park Royal can improve its competitive position, including: • protecting industrial land; • ensuring a greater diversity of unit sizes; • addressing infrastructure issues; and • improving access to amenities.
Park Royal Atlas	• There are a diverse range of businesses in the area

	• At the time of the survey, 19,934 active workspaces were identified. • A broad range of business sectors were identified, including breweries, bakeries, metal workshops, storage, contractors, joiners, hospitals, schools, publishers, film studios, software developers, garages, car sales, pubs, hotels, jewellers, cobblers, lawyers, accountants, spice merchants, medical suppliers, churches and artist studios. • 30% of workplaces are small office type spaces, though workplaces in large warehouses make up 63% of the total floor area. • The central areas of Park Royal stand out for having the greatest diversity of buildings and space types. Many of these are used by micro businesses which count for 75% of workplaces
Park Royal Development Framework Principles	• Park Royal Centre has the capacity to deliver 650 homes, 1,400 jobs and 3,000sqm of A-class uses but through an optimised approach, these targets could be significantly exceeded. • The town centre boundary requires revisions to accommodate required town centre use needs and support place-making. • The junction within the heart of Park Royal Centre should be re-aligned to optimise transport movement • The routes into Park Royal Centre require improvement for walking and cycling. The delivery of an alternative cycling route off the key routes should be explored. • There is an opportunity to deliver significantly enhanced public open space provision in the centre, particularly on the Central Middlesex Hospital site if existing bus routes can be rationalised.
Park Royal Intensification Study	There are a number of sites and locations across Park Royal where there may be opportunities for intensification, including through: • Vertical extension • Horizontal extension • Infill • Internal subdivision • New provision on vacant land • Comprehensive redevelopment
Park Royal Transport Study	Emerging recommendations include providing transport networks that enhance the communities they serve and help local business to operate and grow sustainably, both now and in the future.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.
Sites of Importance for Nature Conservation Statement	• OPDC will utilise the Boroughs evidence base to designate SINCs as part of the Local Plan. This will result in no change to current SINC designations from existing Planning Policy. • The OPDC intends to undertake further work through a Green Infrastructure Study and Biodiversity Action Plan to create a long-term strategy for the enhancement of existing, and creation of new, areas of biodiversity value as part of the wider master plan for future development within Old Oak and Park Royal.

Other evidence base

Supporting Study	Recommendations
LLDC Employment Space Study	Providing a framework and examples of how employment provision can be designed.
Industrial Intensification Primer	Summarises the main forms intensification can take, with case study examples. While some of the options presented are fairly straight forward, and some are possible with greater attention to detail, others will be more challenging, in terms of economic viability and deliverability, as well as ensuring the quality of industrial and residential space. In many cases intensification will have to be considered at the masterplan level as well as the level of individual developments. The document also suggests some typical basic specifications for large and small industrial units to ensure that any intensified or mixed space is suitable for industrial occupiers.

P5. OLD PARK ROYAL

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017)

Policy / paragraph reference	Policy and paragraph text
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners 3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use

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D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in

	a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	Policy and paragraph text
Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character

	and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place. Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As

	change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE L2: PARK ROYAL	Park Royal performs a vital role in supporting the London economy. Building on the area's existing success there is a fantastic opportunity for Park Royal to become the UK's leading industrial location. Park Royal could establish itself as a globally recognised centre for developing innovations such as smart and clean-tech industries. There are also opportunities to attract growing businesses from Imperial College Campus into Park Royal. This can be achieved by; continuing to protect Park Royal as a Strategic Industrial Location (SIL); identifying interventions to improve transport and utility (including connectivity) infrastructure; managing impacts generated during and after the redevelopment of Old Oak; and developing planning and design policies that encourage development that makes more efficient use of land and that works to attract different sectors to the area through the OPDC Local Plan. Today Park Royal houses approximately 1,200 workspaces, employing over 30,000 people in over 2.3 million square metres of gross floor area. The area's historical development has seen changes in the types and form of businesses. During the life of this plan there is a need to improve the operation of the estate and where possible to intensify uses to cater for up to 10,000 new jobs. Given the timescales involved what is most important now is the development of a place that functions well, and which is an attractive business location. Whilst there may be opportunities to support and promote the location of specific business sectors, it is important to retain flexibility to ensure Park Royal can evolve to changing market demands in a timely manner. Park Royal could also play a valuable role in accommodating displaced employment floorspace and businesses from Old Oak.
PR1: Land Use	a. The GLA will continue to support Park Royal as London's leading industrial area by: • protecting existing Strategic Industrial Locations (SIL); and • promoting development and intensification on SIL land. b. New employment proposals in Strategic Industrial Locations should: • deliver new workspace that maximises and intensifies the use of the site to support delivery of 10,000 new jobs in Park Royal and where possible accommodate business relocations from elsewhere in the OAPF area. • deliver new employment workspace that meets identified needs for micro, small and medium enterprises and studios with higher employment

<table>
<tr><td></td><td>densities in locations within easy walking distance to public transport services and/or town centres and elsewhere for larger enterprises with lower employment densities.
c. support the delivery of nationally significant railway infrastructure.</td></tr>
<tr><td>PR2: Infrastructure</td><td>a. Proposals should seek to improve transport and utilities infrastructure.
b. Improvements to:
• the road network should be undertaken across Park Royal, OPDC is currently progressing a Park Royal Transport Study with TfL and the Park Royal Business Group. This work should identify recommendations for improvements to the transport network. This may recommend improvements along the four main roads of Abbey Road, Acton Lane, Park Royal Road and Coronation Road and at junctions with the North Circular Road (A406), Western Avenue (A40) and Old Oak Lane (A4000); and
• the walking and cycling network should be focussed along the routes shown in figure 72.
c. Proposals for employment floorspace should demonstrate how they will maximise the use of sustainable transport modes and facilities for freight movement.</td></tr>
<tr><td>PR3: Streets & Public Realm</td><td>Proposals should:
a. deliver a safe, permeable and legible movement network in accordance with figure 72;
b. Improve streets and create a public realm that enhances local connectivity across Park Royal and to surrounding neighbourhoods;
c. encourage the location of offices and smaller business spaces along the street front to deliver activity along the ground floor and above across Park Royal including the Grand Union Canal, where feasible;
d. utilise a coordinated palette of high quality durable materials and street furniture to support Park Royal’s role and reflect and improve its local character; and
e. support the coordinated management of the public realm.</td></tr>
<tr><td>PR4: Public Amenity Space</td><td>Proposals should accord with Principle D1 and London Plan Policy 7.18 to deliver:
<table>
<tr><th>Name</th><th colspan="2">Location</th><th>Guidance</th></tr>
<tr><td>b.</td><td>Other small amenity spaces</td><td>Located across Park Royal</td><td>These new public amenity spaces should be delivered with stakeholders to deliver a high quality working environment.</td></tr>
</table></td></tr>
</table>

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	**Alternative Policy Option**
N/A. Old Park Royal Place was not identified as a separate place in the Regulation 18 Local Plan.	

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
See Regulation 18 consultation in the Policy Formulation Report for P4 Park Royal West		

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Proposals to designate a new Conservation Area conflict with aims of SIL which seek to support industrial development. Some of the poor quality built fabric would benefit from being redeveloped.	London Borough of Ealing	No change proposed. OPDC's Heritage Study identified a group value to the cluster of heritage buildings and due to the relationship between these buildings and the street/spaces which is consistent with its original layout. The group value demonstrates that the area has special historic and architectural interest and as such it is considered appropriate to be proposed as a new conservation area. The boundary of the Conservation Area will be subject to a separate consultation exercise and the purpose of the conservation area is not to restrict development but to conserve and enhance the special qualities of the area, which should in turn support high quality and appropriate design. P5 also refers to the need to retain the urban grain and street pattern as this is a key feature of the area's historic makeup.
May not be possible to rationalise, minimise or remove on street parking. Park Royal has always relied on vehicle movement and is a hostile environment for pedestrians.	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy P5 recognises this by requiring these enhancements 'where possible and practicable'.
Old Park Royal should be de-designated from SIL to allow for a wider range of uses to mediate transition between Old Oak and	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. The Industrial Land Review and its Addendum set out the rationale for continuing to protect Strategic Industrial Location (SIL) within Park Royal reflecting its success, the area's London-wide role, the loss of industrial land across

Park Royal	Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	London and the ongoing demand for industrial space.
Scope for intensification in Old Park Royal is limited	Old Oak Neighbourhood Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Park Royal Intensification Study explores opportunities as well as deliverable and commercially viable strategies to intensify industrial land. This Study demonstrates that there are sites where it is possible to increase the amount of floorspace and jobs in Park Royal. The Local Plan identifies new industrial site allocations based on this work.
Policy on more generous pavements is desirable but unachievable.	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy P5 recognises the challenges of increasing pavement widths in Old Park Royal by noting that it will be supported 'where this does not have a significant adverse impact on the functioning of the highway'.
Support the designation of the proposed St Leonards Road Conservation Area.	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The boundary of the proposed Conservation Area will be subject to a separate consultation exercise.

Regulation 19(2) consultation

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

impossible to achieve.		businesses.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Air Quality Study	• Adopt a wide range of measures and policies to mitigate against threats to air quality and ensure air quality is comprehensively monitored and assessed when individual developments are proposed. • Manage new development so that it does not add extra emissions to the area. • The area is suitable for declaration as a TfL Low Emissions Neighbourhood. • Adopt policies to minimise travel by private vehicle and encourage transport by low emission modes (walking, cycling and public transport). • Adopt innovative solutions to avoid emissions including consolidation of freight and use of clean freight vehicles. • Support extension of Ultra Low Emissions Zone (ULEZ). • Require development to meet the tightest emissions for on-site plant. • Adopt full enclosure of waste sites in line with Environment Agency guidance. • Plan construction activity in detail to minimise dust emissions and adopt highest standards for emissions from all plant and vehicles during construction.
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development

	• Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Industrial Estates Study	Recommendations for how Park Royal can improve its competitive position, including: • protecting industrial land; • ensuring a greater diversity of unit sizes; • addressing infrastructure issues; and • improving access to amenities.
Industrial Land Review (and addendums)	The recommendations for policy and delivery focus on protecting and maximising the contribution of industrial uses in the OPDC area to support a robust local and regional economy. They are divided into four overarching groups to address the conclusions of the report: *Protect* – acknowledges the high demand for industrial land in the OPDC by focusing on how local planning policies should protect industrial land and industrial businesses within Park Royal. • Protect industrial uses in Park Royal SIL • Reduce non-conforming uses in Park Royal SIL • Return Park Royal HS2 construction sites to SIL • Development adjacent to Park Royal SIL *Intensify* - focuses on planning policies to use the remaining industrial land efficiently and provide industrial space to more businesses. • Efficient use of industrial land • Reduce road congestion • Intensification pilot projects

	Expand – recommends options for the Local Plan and broader strategies to expand the supply of industrial space in the area in response to increasing demand. • Adjust Park Royal SIL boundary • Light industrial floor space in Old Oak • Manage industrial floorspace within the region • Industrial space design and planning guidance *Support* - focuses on how the OPDC can support the local industrial economy and businesses by facilitating the relocation of displaced businesses within the area and supporting businesses to capture procurement opportunities from development at Old Oak. • Business relocation • Low carbon transition • Local procurement • Business listing and online forum
Park Royal Atlas	• There are a diverse range of businesses in the area • At the time of the survey, 19,934 active workspaces were identified. • A broad range of business sectors were identified, including breweries, bakeries, metal workshops, storage, contractors, joiners, hospitals, schools, publishers, film studios, software developers, garages, car sales, pubs, hotels, jewellers, cobblers, lawyers, accountants, spice merchants, medical suppliers, churches and artist studios. • 30% of workplaces are small office type spaces, though workplaces in large warehouses make up 63% of the total floor area. • The central areas of Park Royal stand out for having the greatest diversity of buildings and space types. Many of these are used by micro businesses which count for 75% of workplaces
Park Royal Development Framework Principles	• Park Royal Centre has the capacity to deliver 650 homes, 1,400 jobs and 3,000sqm of A-class uses but through an optimised approach, these targets could be significantly exceeded. • The town centre boundary requires revisions to accommodate required town centre use needs and support place-making. • The junction within the heart of Park Royal Centre should be re-aligned to optimise transport movement • The routes into Park Royal Centre require improvement for walking and cycling. The delivery of an alternative cycling route off the key routes should be explored. • There is an opportunity to deliver significantly enhanced public open space provision in the centre, particularly on the Central Middlesex Hospital site if existing bus routes can be rationalised.
Park Royal Intensification Study	There are a number of sites and locations across Park Royal where there may be opportunities for intensification, including through: • Vertical extension • Horizontal extension • Infill • Internal subdivision

	• New provision on vacant land • Comprehensive redevelopment
Park Royal Transport Study	Emerging recommendations include providing transport networks that enhance the communities they serve and help local business to operate and grow sustainably, both now and in the future.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Industrial Land Review	Adjust Park Royal SIL boundary around Park Royal Centre	OPDC commissioned a Park Royal Development Framework Principles supporting study in February 2018. This has sought to reconcile issues or recommendations related to Park Royal Centre that are currently spread across a number of the Local Plan supporting studies, including the Industrial Land Review and Retail and Leisure Needs Study. The outputs from this work include an assessment of suitable sites for expansion of the town centre and, as a result, a revised town centre/SIL boundary.

Other evidence base

Supporting Study	Recommendations
London Industrial Land Demand (2017)	Update Industrial Land release benchmarks suggest that for the period 2016-41 a total of 233 ha of industrial land can be released, or an average of 9.3 ha per annum. This is a significantly lower level of release than set out in the 2011 Industrial Land Benchmark study and can be explained by industrial land being released at faster than the benchmark guidance and by the fact that the current GLA projections show industrial employment in London declining at a much slower rate than those which informed the 2011 study. This implies much tighter policy is needed if industrial land releases are to be restricted to the Benchmark targets. If industrial land were to continue to be released at the same rate as in recent years then this would result in the loss of 1,630 ha on industrial land. There is already planned release of 838 ha of industrial land in the pipeline and if land identified for Crossrail 2 and the Bakerloo Line Extension were factored in this would rise to 1,277 ha. There is potential for the Benchmark release total to be raised through a combination of intensification, substitution and co-location of industrial activity. Our Intensification and Substitution scenario estimated that the Benchmark Release total could be increased from 233 ha to 783 ha if such approaches could be successfully implemented.

	Given the considerable tightening of the industrial land market in London the current categorisation of Boroughs into Managed, Limited and Restrictive should be revisited. Boroughs should seek to create additional capacity for industrial activity through intensification. This should apply to all Boroughs and in particular to those which are identified as having a positive net demand. Providing capacity does not necessarily mean providing additional land for industrial activity. It can be achieved through intensification of use, providing more capacity for industrial activity on the same site area. This applies equally to those Boroughs that seek release above the benchmark levels. This can be justified if it can be shown that additional capacity for industrial activity has been created through intensification. Secondly Boroughs need to work together and consider industrial demand at the level of their sub-regional property market area. Where one Borough has a positive demand for industrial land and a neighbouring Borough has a surplus of land to release, then there should be some reallocation between Boroughs to ensure demand is met at the property market level. Thirdly there may be some limited scope for demand to be met by transfers between property market areas. As noted in the report there are some signs that occupiers and developers who would previously only consider west London locations are now looking to the east. But any reallocations between Boroughs need to be included in both Borough's plans to ensure demand is met at the London level. Other policy recommendations: *Public Sector Enabling Role* A principal objective of industrial land policy in London, as set out above, should be to encourage intensification of use. There are signs that new innovative and more intensive forms of industrial development are emerging – and these should be promoted through policy. But there may be barriers that may limit the level of intensification that is delivered through the market alone. Many industrial estates have highly fragmented ownership patterns that hinder the type of comprehensive redevelopment that is needed to optimise industrial land use density on a site. Industrial developers may also lack the incentive to redevelop more intensively on a site by site basis as the full value of intensification (in terms of land released for non-industrial development) may not accrue to industrial developers. The public sector may therefore need to intervene in the land assembly process to ensure that the potential benefits that could be realised through intensification are actually realised. *Strengthen Policy and Release Guidance* The stock of industrial land in London is shrinking rapidly and existing policy does not seem to be controlling releases to benchmark levels. The 2011 Industrial Land Demand report recommended improving monitoring to ensure releases were not in excess of Benchmarks.

	That release has continued well in excess of benchmark guidance suggests this cannot be just down to poor monitoring. There therefore needs to be a strengthening of policy and a commitment from both the GLA and Boroughs at the highest level to ensure that the Benchmark Release guidance, with flexibility to allow for intensification, is actually adhered to. *Article 4* Local planning authorities are required to plan for "The locational and premises requirements of particular types of business". But it is increasingly difficult for local authorities to meet this requirement as the supply and range of premises is eroded by permitted development rights for change of use. Boroughs should therefore give consideration to the use of Article 4 Directions to preserve B1a, B1c and B8 from being changed to residential use. This is necessary to maintain
London Industrial Land Supply and Economy Study (2015)	Key results and findings include: *Industrial Land Baseline* • In 2015 there is 6,976 hectares (ha) of industrial land in London of which 4,553ha is core industrial use (65%); 1,887ha is in wider industrial use (27%) and 547ha is vacant land (8%). There was approximately 21 million m2 of industrial floorspace in London in 2012. • From 8,282ha recorded in 2001, the stock of industrial land has declined steadily to 7,841ha in 2006, 7,505 in 2010 and 6,976ha in 2015; This equates to a contraction of 1,306ha or 16% over the whole period and a 7% contraction in the last five years. • Notably, at sub-regional level the Central subregion recorded a significantly higher rate of release of / decline in industrial land in the last five years at 25% compared with the other subregions which recorded declines of around 6% in each case. • The development pipeline and proposed future release rates of industrial land appear to correspond with recent London-wide trend rates of release, suggesting that these rates will persist in future years. • Past trends in industrial land release show an accelerated rate of release significantly above the SPG target rates of release. The trend rate of release for 2010 to 2015 is 105ha per annum, compared with the SPG recommended rate of release of 36.6ha per annum. If these trends continue then the total stock of industrial land in London will decline from around 6,980ha in 2015 by a further 2,300ha to around 4,700ha in 2041, a 33% decline over this period. This is around 1,900ha more than the SPG 2031 industrial land target projected to 2041 (around 6,500ha). *Businesses and Employment* • Employment in industrial occupations in London was estimated at 560,000 jobs in 2014, 46% of which are in designated areas, with 76,000 industrial businesses being recorded. At 7.4 workers per business and with 90% of businesses employing 0-9 people, such a distribution is found to be similar to the distribution for all businesses in London. • It's estimated that 82% of all industrial businesses lie within designated areas, suggesting that either the size of industrial

	businesses in non-designated areas is significantly larger than in the designated areas and / or there are inaccuracies over the way that industrial employment is calculated. This would benefit from further investigation. • Industrial employment in London in the period 2010 to 2015 is estimated to have increased by around 4%, which could represent a reversal of the longer-term trend of decline in industrial employment. Property Market Areas and indicators • Of the approximately 21 million m2 of industrial floorspace in London in 2012, the Park Royal / A40 / Heathrow market contains the highest proportion at 32%. • Available industrial floorspace (2 million m2) represents 10% of total estimated floorspace, exceeding the widely accepted guideline frictional vacancy rate of 8% for effective operation of the market. The availability rate in Outer London also exceeds this at around 12%, with the Thames Gateway recording the highest rate of the property market areas at 14%. • London-wide industrial rental values average £110 per m2, peaking at an average of £123 per m2 in the Park Royal / A40 / Heathrow and Wandle Valley areas and falling to £91 per m2 in the Thames Gateway. • Industrial land values average £4.9m per ha London-wide, with the Wandle Valley having the highest average industrial property values at around £6.2m per ha. Reflecting rents, the Thames Gateway has the lowest at £1.0m per ha (£2.5 per acre). Residential land values reflect a similar pattern to that of industrial with the highest values in the South and West subregions / property market areas and lowest in the East and North. By property market, residential land values range from between 2.6 to 7.6 times industrial land values (Park Royal / A40 / Heathrow and Central Services Circle respectively) which means that there is considerable market pressure to release industrial land for residential development. Industrial Capacity in the Inner South East • The supply of industrial land in the inner South East is estimated to be around 4,882ha, or, in comparison, 70% of the total industrial land supply of London. The largest concentration of land is in the north quadrant, while the largest in London is in the Park Royal / A40 / Heathrow property market. • The rate of industrial land loss in the inner South East is slower than that seen in London. Release of industrial land has been slowest in the inner South East quadrants that are adjacent to the London property markets which have the highest rates. 173 • This could indicate that a process of out migration is occurring with businesses moving from London to locations in the inner South East. This is further represented by the large difference in the total rates of industrial land stock release for the inner South East (-4%) and for London (-16%) *Evidence on Market Failure and Flexibility* Research and conclusions on possible factors that could cause market failure and / or affect the flexibility and ability of industrial businesses to respond to a reduced supply of industrial land are as follows: • Generally there does not appear to be strong evidence so far to suggest that reductions in availability of land and property have a

	direct correlation with increases in rents at a local level. • Case studies suggest that at a local level significant shifts to non-industrial uses can undermine the integrity of industrial areas, and care is needed in planning for and managing change in industrial areas. • There is some evidence to suggest that industrial activities are responding to increased rents and reduced supply by increasing employment densities. • Analysis of changes in employment in recent years in industrial sectors suggests that there could be an emerging pattern of sectors that are more sensitive to London and / or central London locations tending to remain or grow in London, and other sectors that are less sensitive to location will tend to leave London. • In particular it is possible that the scale of a number of industrial activities will tend to be correlated to London's overall population as they directly serve the population. • Data on rates of change of industrial businesses in London suggests that there is a degree of flexibility in the economy and the industrial sector specifically that may not have been appreciated previously. • Broad-brush analysis suggests that overall there is potential for the adjacent South East region to (continue to) accommodate overspill demand from London (or demand transferring to the area as supply contracts in London). • It is likely that if activities servicing core London markets are forced to relocate out of London, either to the adjacent South East or further afield, then total travel miles, congestion and consequent carbon emissions will increase. • There is evidence that some industrial businesses require space for small-scale production and prototyping and rely on access to a skilled workforce, specialist manufacturing activities and agglomeration benefits found in London. These businesses may find it harder to be economically viable if forced to relocate outside London. 8.3.2 The research carried out for this report, together with other data and information, suggests that overall there is a degree of flexibility in the industrial land market and industrial activities to respond to contractions in industrial land supply. Key mechanisms allowing this include potential for some industry to relocate to the wider adjacent South East (or in suitable cases further afield) and probably to a lesser degree there may be potential for intensification of industrial activities on existing land. *Implications for Industrial Land Policy* Review of context, market failure and market mechanisms suggests that if sufficient industrial land can be provided / protected within and around London continued release of industrial land in London may be possible. However the rates of release seen over the last five years appear to be excessive and a more moderate rate of release is probably more appropriate. London appears to be heading towards a situation in which most of its activities located in industrial areas will be associated with servicing the rest of London's economy and population. With the

	projected significant growth in London's population and economy over coming decades and the likely strong positive correlation between these activities and London's population it appears likely that at some point, potentially within the life of the current London Plan, there will be a case to switch from releasing industrial land to retaining most of the remaining land. Whether such a shift is appropriate will depend upon the strategic value placed upon these activities. Care is needed at a local level to be clear on what industry is being protected and to ensure that policies are sufficiently robust and unambiguous, and then are protected with vigour, to reduce the potential for blight, hope values and issues over bad neighbour activities with other sensitive land uses damaging industrial activities and viability.
London Industrial Intensification Primer (2017)	Summarises the main forms intensification can take, with case study examples. While some of the options presented are fairly straight forward, and some are possible with greater attention to detail, others will be more challenging, in terms of economic viability and deliverability, as well as ensuring the quality of industrial and residential space. In many cases intensification will have to be considered at the masterplan level as well as the level of individual developments. The document also suggests some typical basic specifications for large and small industrial units to ensure that any intensified or mixed space is suitable for industrial occupiers.
LLDC Employment Space Study (2015)	Providing a framework and examples of how employment provision can be designed.

P6. PARK ROYAL CENTRE

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners 3) plan for and provide the necessary social and other infrastructure to

	sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water

	6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**
Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people

	and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place. Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries,

	where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE L2: PARK ROYAL	Park Royal performs a vital role in supporting the London economy. Building on the area's existing success there is a fantastic opportunity for Park Royal to become the UK's leading industrial location. Park Royal could establish itself as a globally recognised centre for developing innovations such as smart and clean-tech industries. There are also opportunities to attract growing businesses from Imperial College Campus into Park Royal. This can be achieved by; continuing to protect Park Royal as a Strategic Industrial Location (SIL); identifying interventions to improve transport and utility (including connectivity) infrastructure; managing impacts generated during and after the redevelopment of Old Oak; and developing planning and design policies that encourage development that makes more efficient use of land and that works to attract different sectors to the area through the OPDC Local Plan. Today Park Royal houses approximately 1,200 workspaces, employing over 30,000 people in over 2.3 million square metres of gross floor area. The area's historical development has seen changes in the types and form of businesses. During the life of this plan there is a need to improve the operation of the estate and where possible to intensify uses to cater for up to 10,000 new jobs. Given the timescales involved what is most important now is the development of a place that functions well, and which is an attractive business location. Whilst there may be opportunities to support and promote the location of specific business sectors, it is important to retain flexibility to ensure Park Royal can evolve to changing market demands in a timely manner. Park Royal could also play a valuable role in accommodating displaced employment floorspace and businesses from Old Oak. Outside of SIL, development should be more mixed use, and should look to deliver a minimum of 1,500 homes. In the centre of Park Royal, the existing retail centre should be enhanced and expanded so that it can become a local hub for residents and businesses in Park Royal to include business support services and uses such as meeting spaces and business hotels.

<table>
<tr><td></td><td>The existing character of the Wesley Estate and the nearby playing fields should be enhanced with the Heart of Park Royal reinvigorated to provide a range of services for local communities.</td></tr>
<tr><td>PR1: Land Use</td><td>a. The GLA will continue to support Park Royal as London's leading industrial area by:
• protecting existing Strategic Industrial Locations (SIL); and
c. support the delivery of nationally significant railway infrastructure.
d. New residential uses should be directed to non SIL, including the First Central site where they can be delivered so as not to impact on the functioning of surrounding SIL;
e. Within the Heart of Park Royal, development should deliver a range of services and amenities to support the local business, residential and medical communities;</td></tr>
<tr><td>PR2: Infrastructure</td><td>a. Proposals should seek to improve transport and utilities infrastructure.
b. Improvements to:
• the road network should be undertaken across Park Royal, OPDC is currently progressing a Park Royal Transport Study with TfL and the Park Royal Business Group. This work should identify recommendations for improvements to the transport network. This may recommend improvements along the four main roads of Abbey Road, Acton Lane, Park Royal Road and Coronation Road and at junctions with the North Circular Road (A406), Western Avenue (A40) and Old Oak Lane (A4000); and
• the walking and cycling network should be focussed along the routes shown in figure 72.
c. Proposals for employment floorspace should demonstrate how they will maximise the use of sustainable transport modes and facilities for freight movement.</td></tr>
<tr><td>PR3: Streets & Public Realm</td><td>Proposals should:
a. deliver a safe, permeable and legible movement network in accordance with figure 72;
b. Improve streets and create a public realm that enhances local connectivity across Park Royal and to surrounding neighbourhoods;
c. encourage the location of offices and smaller business spaces along the street front to deliver activity along the ground floor and above across Park Royal including the Grand Union Canal, where feasible;
d. utilise a coordinated palette of high quality durable materials and street furniture to support Park Royal's role and reflect and improve its local character; and
e. support the coordinated management of the public realm.</td></tr>
<tr><td>PR4: Public Amenity Space</td><td>Proposals should accord with Principle D1 and London Plan Policy 7.18 to deliver:
<table>
<tr><th>Name</th><th colspan="2">Location</th><th>Guidance</th></tr>
<tr><td>a.</td><td>Heart of Park Royal small amenity spaces</td><td>Located within the Heart of Park Royal.</td><td>These new public amenity spaces should be delivered on, or coordinated between individual sites with typologies which reflect the nearby employment and housing uses. The Mayor will work with stakeholders to explore how these spaces will be delivered.</td></tr>
</table></td></tr>
<tr><td>PR5:</td><td>New building heights should accord with the guidance set out in the table</td></tr>
</table>

<table>
<tr><td>Building Height & Density</td><td>below and depicted in figure 45:<table>
<tr><td colspan="2">Location</td><td colspan="2">Guidance</td></tr>
<tr><td>a.</td><td>Heart of Park Royal.</td><td>Higher</td><td>A taller building could be located on the existing Asda site. Any tall building would need to respond to the functioning of the surrounding SIL designation and would need to accord with London Plan policies 7.6 and 7.7.</td></tr>
</table></td></tr>
<tr><td>Heart of Park Royal: Vision</td><td>The Heart of Park Royal will be enhanced as a local town centre, providing a range of services and amenities to support the local business, residential and medical communities.</td></tr>
<tr><td>Heart of Park Royal: Key Objectives</td><td>1. Create a sense of place with improved walking and cycling usage with well-defined streets and spaces;
2. Support the intensification of sites including in the delivery of flexible and affordable workspace for smaller and micro businesses;
3. Support a range of uses that support local business operations, this could include local levels of retail, leisure and business services (including meeting spaces and appropriate business hotel accommodation) on the main roads of Abbey Road, Acton Lane, Park Royal Road and Coronation Road and within the Asda site to create active frontages and a sense of place;
4. Explore the potential for delivering a mix of uses on the Asda site and other suitable locations including on land off of Acton Lane which could provide a suitable transition from SIL uses;
5. Support appropriate taller buildings in accordance with Principle PR5;
6. Improve legibility to the surrounding businesses and destinations including local stations, the Grand Union Canal and public open spaces;
7. Deliver new public green spaces near to the junction of the four main streets;
8. Safeguard existing Strategic Industrial Locations (SIL) and ensure that new development continues to support and respond to the important role of the surrounding SIL designation;
9. Secure improvements to transport infrastructure including walking and cycling routes, improvements to the road capacity and layout (as shown in figure 73) and increases in frequency, capacity and connectivity in the local bus network.</td></tr>
</table>

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Alternative Policy Option
4.4	N/A. 4.4 Alternative policy options have not been provided for the preferred policy options as the Old Oak and Park Royal Opportunity Area Planning Framework sets out the principles for each of the places. Overarching consultation questions for the places can be found in Policy OSP5 (chapter 4).

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Town centre uses should be spread out rather than focussed in Park Royal Centre (i.e. near to transport interchanges/routes, extended up to the Wesley Estate)	London Borough of Brent, London Borough of Ealing, SEGRO, workshop	Noted. The priority is to protect the industrial uses and ensure future town centre development does not undermine their ability to function successfully. OPDC continues to propose that town centre uses in Park Royal are focussed in Park Royal Centre (P6). A cluster has been identified in Park Royal West (Brewery), which has also been identified as a potential location for small-scale town centre uses. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.
Should promote redevelopment of ASDA site to provide smaller retail units i.e. Leegate Shopping Centre	London Borough of Brent	Noted. The Park Royal Centre place (P6) supports additional town centre uses, including retail. The Town Centre chapter (TCC3) would also apply and require a mix of retail unit sizes.
Need to clarify whether town centre boundary includes Central Middlesex hospital	London Borough of Brent	Noted. The town centre boundary has been updated to include Central Middlesex Hospital. The hospital performs a key function within the town centre.
Would not support restricting residential uses in PRNC if it included area around the hospital.	London Borough of Brent	Noted. The Park Royal Centre policy supports a range of town centre uses, including residential uses, where they can be located and designed appropriately to ensure they would not compromise the Park Royal Strategic Industrial Location.

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

Should not designate area as a neighbourhood centre, instead it should be designated as SIL	London Borough of Ealing	No change proposed. The Retail and Leisure Needs Study identifies the need for additional town centre floorspace across the area, including a requirement for 3,000 sqm of floorspace in Park Royal Centre. The Park Royal Centre policy has been developed to positively respond to, and seeks meet these development needs, in line with guidance in the NPPF. This approach is considered to be the most effective approach as it provides a clear strategy for accommodating growth.
Should not allow retail on SIL land which adjoins centres	London Borough of Ealing	Noted. New/additional town centre development, including retail uses, required in Park Royal will be focussed within Park Royal Centre town centre boundary. Park Royal Centre is outside of the SIL boundary. Some retail is also supported in the brewery cluster and the new Atlas Junction neighbourhood town centre
Question whether a retail target is needed given the flexibility of SIL policy to accommodate small-scale walk to facilities.	London Borough of Ealing	Noted. The Retail and Leisure Needs Study identifies the need for additional town centre floorspace across the area, including a requirement for 3,000 sqm of floorspace in Park Royal Centre. The Park Royal Centre policy has been developed to positively respond to, and seeks meet these development needs, in line with guidance in the NPPF. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.
PRNC is not a definable Place	London Borough of Ealing	Noted. The Park Royal Centre place policy sets out a range of measures to try and address existing issues and deliver 'place making' improvements in this area.
Little evidence of the PRNC being attractive for hotels	London Borough of Ealing	Noted. The Park Royal Centre place policy supports a range of town centre uses, where they are business focussed and can be located and designed appropriately to ensure they would not compromise the Park Royal Strategic Industrial Location. This approach allows for sufficient flexibility to respond to market demand as this changes over time.
Support for mixed use and concentrated local services	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Noted.
To be viable, uses and activities within	Midland Terrace Resident's	Noted. The Park Royal Centre place policy supports a range of town centre uses, where they

the centre will need to be geared towards business users.	Group, Old Oak Interim Forum	are business focussed and can be located and designed appropriately to ensure they would not compromise the Park Royal Strategic Industrial Location. This approach allows for sufficient flexibility to respond to market demand as this changes over time.
Issues in Park Royal (employment focus, traffic) are unlikely to be solved through measures proposed in the Local Plan.	Midland Terrace Resident's Group	Noted. The Park Royal place policy identifies appropriate measures based on the available evidence on the issues affecting this area and the potential solutions to address these.
Concerns regarding cost of public realm improvements and effectiveness of these	Old Oak Interim Forum	Noted. The Delivery and Implementation chapter and Infrastructure Delivery Plan provide details on the requirements, phasing and funding of infrastructure. The place policies identify appropriate measures based on the available evidence on the issues affecting these areas and evaluates effective options to address them.
Broad support for vision for central hub at PRNC Place	Midland Terrace Resident's Group, Old Oak Interim, SEGRO, TITRA, local resident	Noted.
New uses are proposed while it is still being maintaining as a major traffic interchange.	West Twyford Resident's Association	Noted. Minimising congestion and the need to support more people to walk and cycle in order to reduce vehicular traffic are key issues which the Park Royal place and Transport policies seek to address. The Park Royal Centre place policy identifies appropriate measures based on the available evidence on the issues affecting this area and the potential solutions to address these. The policy supports measures such as the junction realignment and new/improved pedestrian and cycling facilities.
It is not clear on how open green space will be provided and at what cost.	West Twyford Resident's Association	Noted. The Park Royal place policies identify opportunities for new public open space as part of new developments, including within the First Central and ASDA site. The provision and funding for these spaces would be secured through the planning process. In addition to this, as there are limited opportunities for new open spaces, improvements to existing open spaces will be supported.
Careful zoning is required between the different uses to make them work in a SIL area.	West Twyford Resident's Association	Noted. The Park Royal place and Employment policies will ensure that appropriate mitigation is in place so that there are no significant adverse impacts to the functioning of the SIL area and to amenity.
It is not clear how Park Royal Central interfaces with the Wesley Estate.	West Twyford Resident's Association	Noted. The vision for Park Royal Centre is for this to service the local business and residential community. The place policy includes measures to improve the public realm and pedestrian and

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

Public health should be embedded in all developments	workshop	Noted.

Regulation 19 (1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Sites at Acton Lane, in Park Royal Centre, should be identified for supported housing units given their proximity to the Hospital and their unsuitability for conventional residential development.	London Borough of Brent	Change proposed. Supporting text has been amended to reflect that planning permission has been granted for supported housing along Acton Lane. The Housing policies set out more detailed policies on supported housing.
Support place vision including increased shops and services, improved public realm, junction enhancements.	Montagu Evans (on behalf of T.A.S.B. Investments Ltd)	Noted.
Support Park Royal neighbourhood centre and support for a mix of uses such as the Hospital, new shared business focussed services, and other complementary uses	Montagu Evans (on behalf of T.A.S.B. Investments Ltd);	Noted.
Support recognition of the importance of Central Middlesex Hospital	Montagu Evans (on behalf of T.A.S.B. Investments Ltd);	Noted.
Site specific circumstances should be considered when assessing public and movement criteria in Policy P6.	Montagu Evans (on behalf of T.A.S.B. Investments Ltd)	No change proposed. Planning applications will be assessed on their individual merits against the policy objectives.
Support provisions to ensure local character is informed by the area's existing heritage.	Montagu Evans (on behalf of T.A.S.B. Investments Ltd)	Noted.
Should consider a linear centre with uses which animate and civilise the main	London Borough of Ealing	Change proposed. The Park Royal neighbourhood centre and the main routes forming the Big X have been considered as part of Park Royal Centre Development Framework

route, and form part of a coherent spatial strategy for Park Royal		Principles document. The Park Royal place policies take into account recommendations from this work and will ensure that development improves the appearance and experience of the public realm, as well as encouraging people to walk and cycle to/from Park Royal. A Park Royal SPD will be prepared to provide more guidance on implementing the place policies.
Mixed industrial-residential development should be supported in Park Royal Centre.	London Borough of Ealing	No change proposed. Policy P6 and supporting text already support a mix of uses as long they mitigate the impacts on the Strategic Industrial Location (SIL) and accord with other policies in the Plan.
Support idea of heart of Park Royal as a vibrant hub with retail, leisure, health and entertainment facilities. This would also be a suitable location for flexible, affordable office space suitable for start-ups and SMEs and spaces suitable for business meetings and networking.	Park Royal Business Group	Noted. Policy E3 already supports workspaces for small businesses and start-ups.
Land within the Central Middlesex Hospital complex is not publicly accessible. Land to the rear of the site, which is owned by the NHS, may be suitable for open space	London North West Healthcare NHS Trust	Noted. The Park Royal Development Framework Principles document has considered the appropriate mix and location of land uses, including opportunities for open space. All relevant figures in the Local Plan have been updated accordingly.
Support policy to protect and enhance existing social infrastructure, including facilities at Central Middlesex Hospital	Old Oak Neighbourhood Interim Forum; , Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall,	Noted. This is covered by policy TCC4.

	Thomas Dyton	
Greater emphasis could be given to the role of Central Middlesex Hospital as a major employer and catalyst for the regeneration in OPDC	NHS London Healthy Urban Development Unit	Change proposed. Additional supporting text to P6 has been added to reflect the importance of Central Middlesex hospital.
Support Policy	London North West Healthcare NHS Trust	Noted.

Regulation 19 (2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support proposed town centre designation of 247 Acton Lane. Development on this site can contribute to improving neighbourhood centre.	Owner of 247 Acton Lane	Noted.
247 Acton Lane should be identified as a site allocation that can come forward within the 0-10 year timeframe for residential and retail uses. There is a lack of certainty about the deliverability of other housing sites in the town centre, but 247 Acton Lane can offer a greater degree of certainty and help meet higher housing target.	Owner of 247 Acton Lane	No change proposed. Residential development capacity within Park Royal Centre has been identified using National Planning Practice Guidance Housing and Economic Land Availability Assessment guidance based on the Park Royal Development Framework Principles capacity assessment. In order to be identified as a site allocation a site has to meet the thresholds set out in paragraph 3.83 which includes phasing and minimum capacity requirements. Therefore, the site is not considered to meet these thresholds and has not been identified as a site allocation; however, this would not prohibit development of the site. Also, paragraph PRC5 notes that further work is required to understand the deliverability of additional sites within Park Royal Centre, including the sites to the south east of the road junction.
Higher development heights and density should be supported in the Park Royal neighbourhood centre, including a 8-	Owner of 247 Acton Lane	No change proposed. It is not appropriate to identify individual site specific building heights or densities in the Local Plan. These will be assessed on a site by site basis in accordance with Policies SP9, D4 and all other relevant policies in the Local Plan, London Plan and other

10+ storey building on 247 Acton Lane site.		material considerations.
More interesting shops are needed to make Park Royal a town centre. These should welcome all residents, workers and visitors regardless of race or creed.	Wesley Estate Residents Association	No change proposed. Policy P6 supports a range of new town centre floorspace and uses (i.e. shops, services and food and drink uses) to help provide a mix of activities. The planning process cannot control or influence which businesses occupy the units.
Park Royal Centre has further potential to provide additional specialist older persons housing. Policy P6 should include the flexibility to enable a mix of housing to come forward, including specialist housing. Amendments to the text suggested.	London Borough of Brent	No change proposed. Supporting text has already been amended to reflect that planning permission has been granted for supported housing along Acton Lane. The Housing policies set out more detailed policies on supported housing.
The proposed amendment to the boundary of the Park Royal Strategic Industrial Location (SIL) which has been extended to the west of the Neighbourhood Centre to include a parcel of land on Western Road which is owned by RBKC is not justified, nor effective and as such is unsound. The proposals map for the emerging OPDC Local Plan should be corrected in line with the existing adopted Ealing Proposals Map. A change of use to a sui-generis to be utilised as a car pound would be the best future alternative use of the site.	Royal Borough of Kensington and Chelsea	No change proposed. OPDC notes that Ealing's Proposals Map did not identify the site as within the Park Royal Strategic Industrial Location (SIL). OPDC's Industrial Land Review was consulted on as part of the Regulation 18 and first Regulation 19 consultation. This showed the site as SIL. No representations were made contesting the designation. The pre-application discussions regarding proposed used of the site as a car pound is not a matter for the Local Plan to consider. Industrial type functions, services and activities may be permitted in SIL and any proposed use would be assessed on a case by case basis to ensure that it would not undermine the function of SIL or other SIL uses.

Concerned that the search for infrastructure costs to cover intensified development plans for Park Royal will lead to poor quality and overly dense and high developments coming forward in the Park Royal Centre area, Policy P6, in order to fund and support infrastructure developments and meet wider OPDC targets.	Grand Union Alliance	No change proposed. Local Plan policies SP9, D4, D5 and D6 with London Plan policies and national guidance will be used to delivery the highest standards of design quality and ensure existing residential areas benefit from appropriate standards of amenity.
Town centre proposals for Park royal are overambitious. Improved public transport, particularly linking areas within and outside the OPDC area, together with proximity to other facilities in local centres within walking distances and more modest, sensitively sited housing are supported in principle.	Grand Union Alliance	No change proposed. Policy P6 is informed by a range of evidence base which demonstrate the need and/or deliverability of the proposals, including the Park Royal Development Framework Principles document and Retail and Leisure Needs Study. Improvements to facilitate walking, cycling and public transport use and support for new town centre facilities housing are already covered in the policy.
Provision of key worker housing should be part of policy for housing development in Park Royal Town Centre.	Grand Union Alliance	No change proposed. To ensure the plan is in general conformity with the London Plan, the policy seeks to deliver the Mayor's preferred affordable housing tenures which are London Affordable Rent, London Living Rent and London Shared Ownership. London Living Rent in particular will help households on average income levels to save for a deposit. Key workers would be considered eligible for this type of accommodation. London Living Rent is referred to as part of OPDC's tenure mix in Policy H2 which would apply across the OPDC area.
Concerns over the quality of the public realm, adequacy of open space, play space, community	Grand Union Alliance	No change proposed. Development proposals will be required to provide or make appropriate contributions to ensure the delivery of high quality public realm, public open space, play space and social infrastructure in accordance

space and school place provision in the general area. Issues will be exacerbated by more housing. Should provide lifetime neighbourhood and a full range of supporting services should be within walking distance.		with Policy D2, D9, EU1 and TCC4. The Social Infrastructure Needs Study identifies infrastructure requirements for and the demands on delivery of social infrastructure, including schools, across the area taking into account projected growth over the plan period. Policy P6 supports additional town centre floorspace in Park Royal Centre so that it can better service local businesses, employees and residents on the Park Royal estate.
There should be early consultation with the community on the junction realignment and all public realm and movement proposals.	Grand Union Alliance	Noted. Consultation will be carried out in accordance with OPDC's Statement of Consultation and Policy D1.
New and or improved continuous walking and cycling routes need to be supported by having secure, visually acceptable cycle banks / hubs / racks at appropriate sites within the town centre.	Grand Union Alliance	No change proposed. Development proposals will be required to provide high quality, secure, well located, convenient and accessible cycle parking facilities in accordance with Policy T3. This policy will apply across the OPDC area.
Fig.4.19 should be amended to include at least those buildings of merit that were included in the draft Local Heritage Listings document, along with part of the proposed Local Character Area (see Policies Map). An adverse impact on the local street scene and heritage assets, together with a lack of sensitivity to the predominant low rise character of the area would result from a tall building at the Asda site. Way finding should not	Grand Union Alliance	No change proposed. Proposed Local Heritage Listings have yet to be adopted. Should these be adopted by OPDC prior to the Independent Examination, their depiction in Figure 4.19 will be proposed as a minor modification. Subject to the Planning Inspector's decision, these assets will be shown in the Local Plan.

justify tall buildings.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Air Quality Study	• Adopt a wide range of measures and policies to mitigate against threats to air quality and ensure air quality is comprehensively monitored and assessed when individual developments are proposed. • Manage new development so that it does not add extra emissions to the area. • The area is suitable for declaration as a TfL Low Emissions Neighbourhood. • Adopt policies to minimise travel by private vehicle and encourage transport by low emission modes (walking, cycling and public transport). • Adopt innovative solutions to avoid emissions including consolidation of freight and use of clean freight vehicles. • Support extension of Ultra Low Emissions Zone (ULEZ). • Require development to meet the tightest emissions for on-site plant. • Adopt full enclosure of waste sites in line with Environment Agency guidance. • Plan construction activity in detail to minimise dust emissions and adopt highest standards for emissions from all plant and vehicles during construction.
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities.

	Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Industrial Estates Study	Recommendations for how Park Royal can improve its competitive position, including: • protecting industrial land; • ensuring a greater diversity of unit sizes; • addressing infrastructure issues; and • improving access to amenities.
Industrial Land Review (and addendums)	The recommendations for policy and delivery focus on protecting and maximising the contribution of industrial uses in the OPDC area to support a robust local and regional economy. They are divided into four overarching groups to address the conclusions of the report: *Protect* – acknowledges the high demand for industrial land in the OPDC by focusing on how local planning policies should protect industrial land and industrial businesses within Park Royal. • Protect industrial uses in Park Royal SIL • Reduce non-conforming uses in Park Royal SIL • Return Park Royal HS2 construction sites to SIL • Development adjacent to Park Royal SIL *Intensify* - focuses on planning policies to use the remaining industrial land efficiently and provide industrial space to more businesses. • Efficient use of industrial land • Reduce road congestion

	• Intensification pilot projects *Expand* – recommends options for the Local Plan and broader strategies to expand the supply of industrial space in the area in response to increasing demand. • Adjust Park Royal SIL boundary • Light industrial floor space in Old Oak • Manage industrial floorspace within the region • Industrial space design and planning guidance *Support* - focuses on how the OPDC can support the local industrial economy and businesses by facilitating the relocation of displaced businesses within the area and supporting businesses to capture procurement opportunities from development at Old Oak. • Business relocation • Low carbon transition • Local procurement • Business listing and online forum
Park Royal Atlas	• There are a diverse range of businesses in the area • At the time of the survey, 19,934 active workspaces were identified. • A broad range of business sectors were identified, including breweries, bakeries, metal workshops, storage, contractors, joiners, hospitals, schools, publishers, film studios, software developers, garages, car sales, pubs, hotels, jewellers, cobblers, lawyers, accountants, spice merchants, medical suppliers, churches and artist studios. • 30% of workplaces are small office type spaces, though workplaces in large warehouses make up 63% of the total floor area. • The central areas of Park Royal stand out for having the greatest diversity of buildings and space types. Many of these are used by micro businesses which count for 75% of workplaces
Park Royal Development Framework Principles	• Park Royal Centre has the capacity to deliver 650 homes, 1,400 jobs and 3,000sqm of A-class uses but through an optimised approach, these targets could be significantly exceeded. • The town centre boundary requires revisions to accommodate required town centre use needs and support place-making. • The junction within the heart of Park Royal Centre should be re-aligned to optimise transport movement • The routes into Park Royal Centre require improvement for walking and cycling. The delivery of an alternative cycling route off the key routes should be explored. • There is an opportunity to deliver significantly enhanced public open space provision in the centre, particularly on the Central Middlesex Hospital site if existing bus routes can be rationalised.
Park Royal Intensification Study	There are a number of sites and locations across Park Royal where there may be opportunities for intensification, including through: • Vertical extension • Horizontal extension

	• Infill • Internal subdivision • New provision on vacant land • Comprehensive redevelopment
Park Royal Transport Study	Emerging recommendations include providing transport networks that enhance the communities they serve and help local business to operate and grow sustainably, both now and in the future.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.
Retail and Leisure Needs Study	• There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years). • A new town centre hierarchy is identified: - A new major town centre at Old Oak High Street; - A new neighbourhood town centre at North Acton; - A new neighbourhood town centre at Atlas Junction; and - Consolidating and expanding the existing neighbourhood town centre at Park Royal Centre. • Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Industrial Land Review	• Adjust Park Royal SIL boundary around Park Royal Centre	OPDC commissioned a Park Royal Development Framework Principles supporting study in February 2018. This has sought to reconcile issues or recommendations related to Park Royal Centre that are currently spread across a number of the Local Plan supporting studies, including the Industrial Land Review and Retail and Leisure Needs Study. The outputs from this work include an assessment of suitable sites for expansion of the town centre and, as a result, a revised town centre/SIL boundary.

Other evidence base

Supporting Study	Recommendations
London Industrial Intensification Primer (2017)	Summarises the main forms intensification can take, with case study examples. While some of the options presented are fairly straight forward, and some are possible with greater attention to

	detail, others will be more challenging, in terms of economic viability and deliverability, as well as ensuring the quality of industrial and residential space. In many cases intensification will have to be considered at the masterplan level as well as the level of individual developments. The document also suggests some typical basic specifications for large and small industrial units to ensure that any intensified or mixed space is suitable for industrial occupiers.
LLDC Employment Space Study (2015)	Providing a framework and examples of how employment provision can be designed.

P7. North Acton and Acton Wells

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
North Acton Vision	Future development at North Acton will continue to progress along the same lines as the recent successfully completed regeneration in this area. New and improved connections to Old Oak Common Station and the core development area will be important to ensure North Acton is integrated into the wider regeneration. New development in the area will need to deliver a mixture of new public and private amenity spaces. North Acton station will likely require improvements to increase its capacity and access arrangements.
North Acton Key objectives	Support mixed use intensification, including residential, student housing, offices, light industrial, educational uses and potential for retail, leisure and hotel uses closer to North Acton Underground station; 2. should seek to provide flexible space for SME businesses; 3. Be high density in the vicinity of North Acton station; 4. Achieve the highest standards of design when in close to surrounding sensitive locations including existing residential premises and North Acton Cemetery; 5. Improve pedestrian and cycle connections between North Acton, Old Oak and Wormwood Scrubs and provide improved connections to communities

	south of the A40; 6. Improve the road network within North Acton to provide better facilities for pedestrians, cyclists and bus users. Ealing Council are currently assessing the potential to improve the Gyratory system; 7. Secure wholesale improvements to the public realm across North Acton and in particular on the one-way system along Victoria Road and Wales Farm Road; 8. Provide a mix of public and private amenity spaces 9. Support new access and new amenity space at the entrance to North Acton Underground station; and 10. Explore the opportunity to upgrade North Acton station to provide additional capacity and improved access to accommodate increased passenger numbers

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Development in North Acton is devoid of any sense of place and has poor architectural quality	The Hammersmith Society	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
More green space needs to be provided in North Acton	Grand Union Alliance	Change proposed. Policy P7 identifies a number of new and improved publicly accessible open spaces across the area.
OPDC should restrict the amount of future student housing permissible in North Acton	The Hammersmith Society	Noted. The delivery of student housing is managed by policy H10.
Broadly support policy approach	City and Docklands Property Group, Diocese of London, Imperial College London, London Borough of Ealing	Noted.
Proposals for the site at 6 Portal Way should be taken into account in the development capacity work for North Acton.	City and Docklands Property Group	Noted. This information has informed the Development Capacity Study (2017) and resultant minimum housing figure for North Acton and Acton Wells.
Clarification is required on how proposals should support the delivery of Grand	Diocese of London	Noted. Delivery of new streets will be implemented in accordance with guidance

Union Street.		in the Delivery and Implementation Chapter.
North Acton has an overconcentration of student housing. Support for broader mix.	Diocese of London, Midland Terrace Resident's Group, Old Oak Interim Forum, workshop, workshop, commonplace, commonplace, commonplace	No change proposed. The delivery of student housing is managed by policy H10. This requires proposals for student housing to contribute to the vibrancy and diversity of an area and not result in an overconcentration in any one specific location.
PRS not supported/ should be limited	Midland Terrace Resident's Group, Old Oak Interim Forum, Wells House Road Resident's Association, workshop	No change proposed. Delivery of 'Build-to-rent' housing is managed through policy H6.
Student housing should be restricted	Diocese of London, Wells House Road Resident's Association, local resident, local resident, workshop, workshop	No change proposed. The delivery of student housing is managed by policy H10. This requires proposals for student housing to contribute to the vibrancy and diversity of an area.
Welcomes the requirement for new development to provide significant contributions towards and facilitate the delivery of improvements to North Acton station. Pre-feasibility study should be noted.	GLA, TfL	Noted. To support the future proofing of the Local Plan, reference to the pre-feasibility is not provided. The supporting text to policy P7 identifies the need for OPDC to work closely with TfL and Network Rail to deliver improvements.
The suggested new station entrance seems to contradict Ealing's plans to create a Station Square	Grand Union Alliance	Noted. Policy P7C1 requires development to coordinate enhancements of the station with the southern station square.
The plans for extra housing on TfL land needs to be made explicit.	Grand Union Alliance	No change proposed. OPDC considers referencing enabling development over and the around the station to be sufficiently clear.
Given lack of amenity space, Plan should provide justification on how further intensive development can contribute to the creation of a lifetime neighbourhoods in North Acton.	Grand Union Alliance	Change proposed. Policy P7 identifies a number of new and improved publicly accessible open spaces across the area. The supporting text to policy P7 sets out the justification for high density development and tall buildings in North Acton.
OPDC needs to clarify what would remain as a SIL	Grand Union Alliance	Change proposed. Policy SP5 and the Local Plan

location.		policies map define the boundary of SIL.
The issue of traffic calming needs to be addressed.	Grand Union Alliance	Change proposed. Policy P7 requires improvements to support walking and cycling across the area.
Student housing should not be restricted in this location. Appropriate safeguards to protect conventional housing are already included in H10 and impacts can be managed.	Imperial College London, commonplace, commonplace	Noted. The delivery of student housing is managed by policy H10.
The Plan shouldn't include a presumption that there is already an over concentration of student accommodation in North Acton.	Imperial College London, London Borough of Ealing	Noted. The delivery of student housing is managed by policy H10.
Support delivery of new education and community uses, R&D, and incubator space	Imperial College London	Noted
Supporting text should refer to and support the presence of Imperial College in the area	Imperial College London	Change proposed. Imperial College is referred to as a significant land owner within the supporting text to policy P7.
The links between North Acton and Old Oak should be more direct and legible.	London Borough of Ealing	Change proposed. Policy P7 now refers to Old Oak High Street continuing to North Acton from Old Oak South.
Plan should aim to ensure balanced housing provision	London Borough of Ealing, workshop	No change proposed. The delivery of student housing is managed by policy H10. This requires proposals for student housing to contribute to the vibrancy and diversity of an area and that proposals should not result in an overconcentration of student accommodation in any one specific location.
Need to be clear that encroachment of retail into SIL is not appropriate	London Borough of Ealing	Noted. Policy P1 and relevant London Plan policies provide guidance for protecting industrial type uses within SIL.
Active frontage should be a criterion for mixed uses in North Acton	London Borough of Ealing	Noted. Policy P7 identifies the required locations for active and positive frontages to provide a high quality public realm around mixed use developments.

Local residents are very disappointed with the way North Acton has been developed. Would like to see a creation of real community and more successful Place.	Midland Terrace Resident's Group, WARA, workshop	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
Would like further clarity on how issues with existing gyratory will addressed.	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. Policy P7 provides guidance to improve walking and cycling across the area including the portion of Victoria Road south of North Acton Station.
Would like to see planning decisions in North Acton to be taken by the OPDC	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, Wells House Road Resident's Association, WARA	Noted. OPDC will work closely with LB Ealing and the Greater London Authority to implement the policies of the Local Plan.
Potential for LB Ealing to take a more robust approach to London Plan policy 7.7.	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. OPDC will work closely with LB Ealing and the Greater London Authority to implement the policies of the Local Plan.
The Plan should preserve the character of North Acton station, and the buildings of historical interest such as Monarch House and Perfume Factory.	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, Wells House Road Resident's Association	Change proposed. Policy P7 seeks to strengthen local identity and character by responding to the locally listed Elizabeth Arden Factory and other proposed locally listed buildings in the design of new development.
Do not support density levels of 600 units per hectare anywhere in the OPDC area.	Midland Terrace Resident's Group, Old Oak Interim Forum	Noted. Density ranges have been removed from the Local Plan. Policy SP9 requires the height of proposals to respond to public transport access and sensitive locations. Policy P7 provides further local guidance for building heights including potential locations for tall buildings around North Acton station, neighbourhood town centre, Old Oak High Street and other key routes that do not result in an overbearing wall of development. Height may be used to mitigate impacts of air and noise pollution from railways and roads. Generally lower heights are expected adjacent to sensitive

		locations such as existing residential areas. Policy D5 provides specific guidance for tall buildings with policy D6 providing guidance to protect amenity.
Clarification required on the scheme of delegation with LB Ealing	Old Oak Interim Forum, Midland Terrace Resident's Group	Noted. This information is provided on OPDC's webpages.
Support social infrastructure policy objective	Old Oak Interim Forum, Midland Terrace Resident's Group, TITRA, Wells House Road Resident's Association	Noted.
Support certain transport infrastructure policy objectives	Old Oak Interim Forum, Midland Terrace Resident's Group	Noted.
The access road to Victoria Industrial Estate/Monarch House near North Acton must be maintained and not used as open space.	SEGRO	Change proposed. Policy P7 and supporting figures continue to support the location and role of this route.
Supports designation of North Acton centre	SEGRO	Noted.
Would like further detail on how Perfume Factory and Brunel Road sites will be brought forward for housing and employment uses and relocation strategies.	SEGRO	Change proposed. Policy P7 and policy P8 provide guidance for these locations.
Part k) should refer to the potential for over station development.	TfL	Change proposed. Policy P7 now refers to over station development.
Part q) should take account of the comprehensive masterplan for the North Acton station and the wider area, including the potential for over station development and the provision of new public spaces in the wider area. Flexibility is required as this work is Still ongoing.	TfL	Change proposed. Policy P7 identifies a number of new and improved publicly accessible open spaces across the area. This is based on the Victoria Road and Old Oak Lane Development Framework Principles document.
Concerned about building uses, heights and quality of development in North Acton	TITRA	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
Concerned about past poor design and non-delivery of family housing and community needs.	Wells House Road Resident's Association	Noted. Policy P7 provides guidance to improve the sense of place through new development for both

		buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations. Family housing is guided by policy H4. Community facilities are guided by policy TCC4.
There needs to be more mixed tenure housing.	Wells House Road Resident's Association	Noted. Policy H3 provides guidance for housing mix. Policy H10 regarding student housing will also be implemented in North Acton.
There needs to be more diversity in the range/quality of shops	Wells House Road Resident's Association, Local resident	Noted. Policy TCC1 continues to identify North Acton as a new neighbourhood town centre to help shape the retail offer.
There is a need for additional school places to accommodate the needs of new families moving into the area	Wells House Road Resident's Association	Noted. OPDC's Infrastructure Delivery Plan sets out the requirement for school places to meet the need of the development. Relevant place policies, including P7 provide guidance for the potential location of schools.
Concerned about the impact of tall buildings. Heights should be capped and cascade down	WARA	No change proposed. The London Plan directs tall buildings to Opportunity Areas. Policy SP9 requires the height of proposals to respond to public transport access and sensitive locations. Policy P7 provides further local guidance for building heights including potential locations for tall buildings around North Acton station, neighbourhood town centre and other key routes that do not result in an overbearing wall of development. Height may be used to mitigate impacts of air and noise pollution from railways and roads. Generally lower heights are expected adjacent to sensitive locations such as existing residential areas. Policy D5 provides further detailed guidance for managing tall buildings. The height of tall buildings will be determined on a case by

		case basis in accordance with the Local Plan, London Plan, NPPF and other relevant material considerations.
Adequate local infrastructure should be provided. Existing health care infrastructure in North Acton is under pressure. Developments in North Acton should be contributing more towards healthcare provision.	WARA	Noted. OPDC's Infrastructure Delivery Plan sets out the requirement for social infrastructure to meet the need of the development. Relevant place policies, including P7 provide guidance for the potential location of social infrastructure.
Existing residential streets should be identified as sensitive areas	WARA	Change proposed. Existing residential areas are identified as sensitive locations.
The Barratts Green Road - North Acton road crossroads area should be allowed to develop as a very small-scale retail and restaurant centre.	local resident	No change proposed. This location is within the SIL designation. OPDC continues to propose that town centre uses in Park Royal are focussed in Park Royal Centre (P6). Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres.
Agree with number of jobs/homes	local resident	Noted.
North Acton is currently 'self-enclosed'	workshop	Noted. Policy P7 provides guidance to connect North Acton with surrounding areas through new and improved streets.
Existing retail in this area is 'student focused'	workshop	Noted. Policy TCC1 continues to identify North Acton as a new neighbourhood town centre to help shape the retail offer.

Integrate East Acton with North Acton. Can link North Acton to rest of the area via Victoria Road	workshop	Noted. Policy P7 provides guidance to connect North Acton with surrounding areas through new and improved streets.
More local services are required so people don't have to travel out of the area	workshop	Noted. Policy TCC1 continues to identify North Acton as a new neighbourhood town centre to help shape the retail offer.
Would prefer hotel rather than more student housing	workshop	Noted. Hotels are defined as town centre uses and would be appropriate within North Acton neighbourhood town centre in accordance with policy P7.
Should provide more green space in North Acton. It is not clear if existing open space will be protected. Policy should cover greenspace, landscaping/tree planting.	workshop, workshop, commonplace	Change proposed. Policy P7 identifies a number of new and improved publicly accessible open spaces across the area.
Lifetime Neighbourhoods should be encouraged in north Acton, including family housing	workshop	Noted Policy SP2 requires proposals to contribute to the delivery of Lifetime Neighbourhoods across the OPDC area, including North Acton.
It is too late to save North Acton from more student housing	workshop	Noted. The delivery of student housing is managed by policy H10.
Support for access across North Acton station	workshop	Noted
Could consider mixing light industrial with residential on northern side of North Acton station	workshop	Noted. The delivery of the subsurface portion of High Speed 2 through the OPDC area requires the use of natural ventilation to support its functioning. This will require the provision of an open air ventilation box north of North Acton Station. This will have significant impacts on the development of this area. OPDC will work closely with HS2 to explore what uses will be appropriate for this site. Likely uses include a mix of employment and town centre uses at ground and lower floors with potential for housing above.
Should consider previous junction option which was	workshop	Noted.

planned		
Question whether schools will cater for new or existing households and where the current pressures are in terms of school places	workshop	Noted. OPDC's Infrastructure Delivery Plan sets out the requirement for school places to meet the need of the development. Relevant place policies, including P7 provide guidance for the potential location of schools.
Concerned about local school capacity (including Harlesden and Wembley) and potential travel times to schools	workshop	Noted. OPDC's Infrastructure Delivery Plan sets out the requirement for school places to meet the need of the development. Relevant place policies, including P7 provide guidance for the potential location of schools.
Question whether CIL contributions are sufficient given the value of the new properties	workshop	Noted. OPDC will be consulting its proposed CIL charging schedule later in 2017.
Area, particularly Horn Lane, is heavily polluted. The policy omits environmental factors/impact	workshop, workshop, workshop, commonplace	Change proposed. Policy P7 provides spatial guidance for mitigating the impacts of air pollution. Policy EU4 provides general guidance to improve air quality.
Concerns regarding student housing	workshop, workshop	Noted. The delivery of student housing is managed by policy H10.
The area suffers from overdevelopment.	workshop, workshop	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
Should get rid of the cement works	workshop	Noted.
Residential uses should not be encouraged in North Acton due to its poor environment (traffic, pollution, industrial uses). It should be commercial focussed.	workshop	No change proposed. Policy P7 supported a mixed use approach for North Acton reflecting its good public transport access. Policy P7 provides spatial guidance for mitigating the impacts of air pollution. Policy EU4 provides general guidance to improve air quality.
North Action is poorly designed/unattractive and plan does not deal with this major issue	workshop	Noted. Policy P7 provides guidance to improve the sense of place through new development for both

		buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
There are enough eating and drinking establishments	workshop	Noted.
Disagrees with development capacity figures	commonplace, commonplace	Noted. Updated development capacity figures have been produced in accordance with relevant PPG guidance.
Difficult to find a good solution for North Acton, so a do nothing approach might be better unless major plans/interventions are possible	commonplace	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
Would prefer to warehousing to the north etc. redeveloped with significantly more open space and lower rise housing and not replicate what has happened around the rest of North Acton	commonplace	Noted. Policy P7 provides guidance to improve the sense of place through new development for both buildings and public realm. OPDC will work closely with LB Ealing to deliver these aspirations.
North Acton would be better connection from Old Oak than East Acton. Concerned that links to East Acton would be detrimental to leisure use, nature conservation and heritage assets.	Hammersmith and Fulham Historic Buildings Group	Noted. Policy P7 identifies the continuation of Old Oak High Street to North Acton from Old Oak South. There is potential to provide a new walking and cycling route between the Victoria Estate and Westway Estate subject to feasibility.
There are a few buildings in Victoria Road which could be retained.	Hammersmith and Fulham Historic Buildings Group	Noted.
The pedestrian route from opposite the Castle Pub to Old Oak lane near the railway bridge, which is currently closed, could be reopened.	Hammersmith and Fulham Historic Buildings Group	Noted. Policy P7 identifies the potential to provide a new walking and cycling route between the Victoria Estate and Westway Estate subject to feasibility.
Would like the “rocket” made of scrap metal outside the waste company to be retained.	Hammersmith and Fulham Historic Buildings Group	Noted.
Imperial College have a keen interest in the North Acton area.	Imperial College London	Noted.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Imperial supports policies for both student accommodation and new homes in this place, especially affordable, for both students and staff. Imperial also recognises the role well designed tall buildings can play in this and other areas.	Imperial College	Noted.
General support for policy P7	Osbourne Investments Limited and Quattro Holdings Limited, Citrus Group and Fuller Smith & Turner, London Borough of Ealing, Friary Park Preservation Group	Noted.
Land take for Old Oak High Street should be minimised so that the developability of adjacent sites is not compromised.	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. Land required to deliver Old Oak High Street will be defined based on identified need to support transport modes and delivery of Healthy Street aspirations and a high quality place.
Policy should be more specific on location for tall buildings, and should identify the Boden House site as suitable for tall buildings.	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. Policy SP9 had been amended to accord with requirements of London Plan policy D8 to define locations of tall buildings. The figure supporting this policy defines Boden House as a location appropriate for tall building in principle.
The Boden House site has the potential to deliver significantly higher housing numbers than identified in the site allocations table.	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. OPDC considers the capacity identified for the site is appropriate and accords with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. The methodology for identifying this capacity is set out in OPDC's Development Capacity Study which is based on indicative capacities provided by the Victoria Road and Old Oak Lane Development Framework Principles development capacity

		assessment. The homes capacity figures are minimum figures and additional capacity may be appropriate subject to proposals according with national guidance, London Plan Policies and Local Plan Policies.
The Elizabeth Line rail spur has not been proved feasible or financially viable, and is not safeguarded by appropriate bodies. Safeguarding of the line has major impacts on the developability of the site, and clarify is required on its feasibility.	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. Proposals to deliver a link between the Elizabeth Line and West Coast Main Line have been withdrawn following the decision to explore the delivery of the West London Orbital Line. As these two elements are mutually exclusive, references to safeguarding land to facilitate delivery of the spur have been removed from the Local Plan. To reflect emerging transport proposals text has been provided to safeguard land for West London Orbital Route Line in Acton Wells.
The safeguarding of the Quattro Site for waste management purposes following release by HS2 is not compatible with the vision for the Place and Old Oak High Street. Policy should refer to the possibility of the waste site being relocated.	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. The current version of the West London Waste Plan safeguards the site. This is Development Plan policy. However, OPDC will be working with the West London Waste Authorities to update the West London Waste Plan to align with the draft London Plan waste apportionment figures and the continued designated of this site for waste apportionment purposes will be reviewed as part of this.
The policy and the text in the table (page 101) should be amended to be consistent with representations on Policy P7C2 and Policy P8.	Castlepride Limited	Noted. Refer to OPDC's responses to these issues.
Greater detail should be provided on the potential Elizabeth Line-WCML spur to aid understanding.	Transport for London (Group Planning)	Change proposed. Proposals to deliver a link between the Elizabeth Line and West Coast Main Line have been withdrawn following the decision to explore the

		delivery of the Chiltern Line. As these two elements are mutually exclusive, references to safeguarding land to facilitate delivery of the spur have been removed from the Local Plan. To reflect emerging transport proposals text has been provided to safeguard land for the Chiltern Line in Acton Wells.
Strongly object to proposed local listing of The Castle. The Castle pub has not previously been identified worthy of local listing and nothing has occurred recently to suggest it should be. Change to surrounding areas does not affect the historic significance of The Castle Pub. The building is unremarkable and there are many other examples of buildings typical of this era.	Citrus Group and Fuller Smith & Turner	No change proposed. OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that The Castle Pub exhibited sufficient local heritage significance to warrant its proposed designated as a non-designated heritage asset on OPDC's forthcoming Local List. This is based on the recognition that it has historic, townscape, architectural and social significance. It is one of the few character buildings remaining in the area. The corner turret is a local landmark that contributes to the building providing a positive juxtaposition to the surrounding built form. OPDC consulted on the Local List in early 2018.
Change in the area from one of industry and rail and road networks should not be cited as a reason for retaining buildings with little or no historic value which could undermine delivery of development	Citrus Group and Fuller Smith & Turner	No change proposed. OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that The Castle Pub exhibited sufficient local heritage significance to warrant its proposed designation as a non-designated heritage asset on OPDC's Local List. This is based on the recognition that it has historic, townscape, architectural and social

		significance. It is one of the few character buildings remaining in the area. The corner turret is a local landmark that contributes to the building providing a positive juxtaposition to the surrounding built form.
Support for a mixed use town centre.	London Borough of Ealing	Noted.
It is necessary to be explicit that the routes connecting North Acton and Old Oak need to be direct and legible and ensure North Acton is integrated with Core Old Oak Common area.	London Borough of Ealing	Noted. Policies SP7, T1 and T2 also provide guidance to ensure routes are high quality.
Support the policy of ensuring a balanced approach to student housing.	London Borough of Ealing	Noted.
Proposals for public realm are welcomed.	London Borough of Ealing	Noted.
Policy should set clear objectives for the upgrade of North Acton Station.	London Borough of Ealing	No change proposed. OPDC considers the guidance set out in P7C1 to be sufficiently detailed for the role of a Local Plan to support future upgrades to North Acton Station
Publicly accessible open space policies need to provide clearer guidance for the roles of open spaces to deliver playing fields.	Sport England	Change proposed. Policies SP8 and EU1 provide guidance for delivering multifunctional open spaces. Policy EU1 has been amended to include the need for playing fields as part of open space provision. Policy P7 provides place specific guidance for open spaces appropriate to the role of a Local Plan.
The promotion of tall and high density development on the Victoria Industrial Estate, and reference to a minimum rather than target/maximum number of homes is supported.	SEGRO	Noted.
These comments have not been published due to inappropriate content.	Ron Thorp	N/A
Dull and dismal in the extreme.	Ron Thorp	Noted. Policy P7 provides place specific guidance to deliver a high quality built

		environment.
Towers in North Acton should be knocked down and replaced with buildings of lower heights.	Ron Thorp	No change proposed. North Acton has already been established as a place for tall buildings and this approach will continue to be supported reflecting existing and future improved public transport access. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations.
Recently developed housing units are too small.	Ron Thorp	Noted. Policy H3 requires all self-contained housing to meet London Plan and national housing space standards.
Para NA.14 regarding improving air quality should be strengthened, and the text should be included in policy.	Joanna Betts, Francis, Marc and Caroline Sauzier, Lily Gray, Wells House Road Residents Association, Catherine Sookha, Thomas Dyton	No change proposed. Policy P7 provides guidance for improving air quality based on OPDC's Air Quality Study.
Site for secondary school should be allocated/safeguarded within North Acton even if it is not required until after the plan period.	Diocese of London	No change proposed. Policy P7 requires development to contribute to the delivery of infrastructure requirements as set out in the OPDC's Infrastructure Delivery Plan.
Development in North Acton has been of poor quality.	Hammersmith Society, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Ron Thorp	Noted. London Plan policies and Local Plan policies SP8, D1, D4, D5 and P7 provide guidance to deliver a high quality built environment.
Additional student housing in North Acton is not supported as there is already an overconcentration.	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents Association, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	Noted. Policy P7 seeks to deliver appropriate levels of student accommodation in accordance with Policy H10. Policy H10 sets out guidance to ensure student accommodation contributes positively to an area by requiring proposals to

	Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	contribute to the vibrancy and diversity of an area, by locating development in areas of high PTAL, to not undermining the delivery of conventual self-contained housing supply and to not result in an overconcentration in any one specific location.
It is important that the connection between Acton Wells and Old Oak South and the Old Oak Common Lane Station are designed well	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies SP7, P1, T1 and T2 also provide guidance to ensure routes are high quality.
The Plan should not identify P7 as a strategic policy, allowing a neighbourhood plan's policies to take precedence.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they

		set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
Policy does not discourage a mono-type of housing (student housing) being delivered in North Acton	Harlesden Lets	Noted. Policy P7 seeks to deliver appropriate levels of student accommodation in accordance with Policy H10, which requires schemes to not result on an overconcentration of student accommodation in one location.
Figure 4.33 Use of Kings Cross as a precedent as it is not well planned or generous in terms of open space provision.	Regents Network	No change proposed. OPDC considers Kings Cross to be an appropriate precedent which provides a range of high quality publicly accessible open spaces.
Figure 4.34 Information supporting the precedent is nondescript and a better photo is needed.	Regents Network	No change proposed. OPDC considers the description of figure 4.34 to be appropriately detailed and of a sufficient quality.
North Acton tall buildings do not relate to surrounding context. Additional residents will have an impact on social infrastructure	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. North Acton has already been established as a place for tall buildings and this approach will continue to be supported reflecting existing and future improved public transport access. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations. Requirements for developers to contribute to social infrastructure are set out in Policy TCC4.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support for safeguarding land for the West London Orbital Line Station.	London Borough of Brent	Noted.

Guidance for safeguarding of land for the WCML Crossrail Spur should be reinstated.	London Borough of Brent	No change proposed. DfT and TfL have formally withdrawn support for this proposal. Exploration of delivering the Chiltern Line to Old Oak Common Station is underway. This would prohibit the delivery of the WCML spur.
OPDC should work with the London Borough of Ealing to stop tall buildings and preserve the Castle Public House.	West Acton Residents Association	No change proposed. North Acton has already been established as a place for tall buildings and this approach will continue to be supported reflecting existing and future improved public transport access. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations. This is reflect in policy D5. As part of the Scheme of Delegation with the London Borough of Ealing, Ealing continues to determine planning applications in North Acton. Ealing's planning officers should be making use of OPDC's Local Plan policies D8: Heritage and TCC7 to manage any application affecting the Castle Public House.
Equality Impact Assessments have not been carried out to assess impact of high density development in North Acton	West Acton Residents Association	No change proposed. The Local Plan's Integrated Impact Assessment integrates an Equalities Impact Assessment, including the policies for building heights in North Acton.
Support for safeguarding land for the West London Orbital Line Station.	London Borough of Brent	Noted.
Request for continued safeguarding of Elizabeth Line Spur	London Borough of Brent	No change proposed. DfT and TfL have formally withdrawn support for this proposal. Exploration of delivering the Chiltern Line to Old Oak Common Station is

		underway. This would prohibit the delivery of the WCML spur.
Policy P7 should state TfL owned land surrounding North Acton Station is suitable for high quality residential led development including tall buildings.	Transport for London Commercial Development	No change proposed. Policy P7 supports mixed use high density residential development across the area. Policy SP9 identifies North Acton and Acton Wells as an appropriate location for tall buildings in principle.
Figure 3.15 conflicts with Policy P7 guidance for building heights.	Osbourne Investments Limited and Quattro Holdings Limited	Change proposed. To reflect the building heights illustrated in the Victoria Road and Old Oak Lane Development Framework Principles, Policy P7(l) will be amended to clarify the location of where 10-12 storeys will generally be appropriate along Victoria Road.
Welcome removal of safeguarding for the Elizabeth Line Spur	Osbourne Investments Limited and Quattro Holdings Limited	Noted.
Size and location of Acton Wells Square should be confirmed as indicative.	Osbourne Investments Limited and Quattro Holdings Limited	No change proposed. Local Plan Appendix identifies that figures in the Local Plan are indicative.
Boden House is appropriate for the highest density of development and tall building heights.	Osbourne Investments Limited and Quattro Holdings Limited	Noted. Development densities and building heights will be determined using all relevant Local Plan and London Plan policies alongside any relevant material considerations.
Suggest that text is added noting that “TfL is currently undertaking work with stakeholders to further develop the proposal, including reviewing the feasibility of the scheme and updating the business case.”	Transport for London	Change proposed. The suggested wording will be added to supporting text to Policy P7.
Guidance for delivering generally lower heights adjacent to existing residential neighbourhoods to be inadequate	TITRA	No change proposed. This guidance is considered to be appropriate for the role of a Local Plan and reflects recommendations in the Victoria Road and Old Oak Lane Development Framework. Tall buildings will need to take into account the surrounding sensitive

		locations and accord with national, London Plan policies, Local Plan policies and other material considerations. Relevant Local Plan policies include D4, D5, D6 and D8 and place policies.
Object to tall buildings in North Acton and Acton Wells	TITRA	No change proposed. This guidance is considered to be appropriate for the role of a Local Plan and reflects recommendations in the Victoria Road and Old Oak Lane Development Framework. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations. Relevant Local Plan policies include D4, D5, D6 and D8 and place policies.
Support for building heights guidance.	Aberdeen Standard Investments	Noted.
Cluster policies should repeat place policies	Aberdeen Standard Investments	No change proposed. The National Planning Practice Guidance states that Local Plans should avoid undue repetition. It is not considered appropriate to repeat place policies within cluster policies.
North Acton is a poor example for Old Oak. Overstation development will negatively impact the SINC designation of the railway corridor.	Grand Union Alliance	Noted. The Local Plan provides strategic guidance to deliver a high quality built environment of new development in the OPDC area. Any development affecting SINC designations will need to accord with policy EU2.
Support for P7 Vision, land use, public realm and movement and building heights guidance.	Citrus Group and Fuller Smith & Turner	Noted.
Object to the proposed Local Listing of The Castle Public House.	Citrus Group and Fuller Smith & Turner	No change proposed. Please refer to response to First Regulation 19 Consultation comment P7/10.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 6,000 new homes within North Acton and Acton Wells. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 4,600 new jobs in North Acton and Acton Wells. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations
Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including: • 5 broad historic themes: o Grand Union Canal; o Rail heritage; o Industrial heritage; o Residential enclaves; and

	○ Scrubland and open space. • a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets. • heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.
North Acton District Energy Network Study	• The assessment concludes that it is not commercially or economically viable to deliver a strategic heat network • The review concludes that providing a network using gas fired CHP would be problematic as fossil fuel based systems are less carbon efficient than conventional grid electricity supply and high efficiency boilers. • To deliver carbon savings and meet Mayoral objectives, new development will have to use heat pumps and low carbon heat sources. This is more technically challenging and riskier commercially. • It may be possible for a small heat network to provide 2 or 3 new developments with low carbon heat and hot water. It may be possible to use a local aquifer to support this and to locate the energy centre in the basement of one of the developments. • Further work is required to test the flow rate and temperature of any aquifer. • The developers need to be approached to secure their support for a shared small scale local network and to agree where to cite a small energy centre. • Funding will need to be secured to develop a scheme. • An alternative zero carbon pathway for North Acton will be needed if a low carbon heat network cannot be provided.

Retail and Leisure Needs Study	• There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years).
	• A new town centre hierarchy is identified:
	  - A new major town centre at Old Oak High Street;
	  - A new neighbourhood town centre at North Acton;
	  - A new neighbourhood town centre at Atlas Junction; and
	  - Consolidating and expanding the existing neighbourhood town centre at Park Royal Centre.
	• Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre
	• A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.

Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.
Victoria Road and Old Oak Lane Development Framework Principles	• Manage the transition between Old Oak and Park Royal by coordinating the mix of uses, built form and different character of the two areas. • Support the functioning of Strategic Industrial Locations (SIL).

	• Deliver mixed-use development in areas outside of SIL to support the local economy and deliver housing.
	• Focus active retail, social infrastructure, community and leisure uses in clusters around stations and town centres.
	• Retain and enhance existing residential areas.
	• Working positively and proactively with High Speed 2 Limited to address impacts on the public realm, open spaces, movement and residential amenity.
	• Support north-south movement along Victoria Road and Old Oak Lane through improvements to walking and cycling routes and the carriageway that mitigate impacts during the construction of High Speed 2 and in the longer-term.
	• Deliver a well-defined street with generous footpaths, segregated cycle lanes on main routes and positive and active frontages across the area.
	• Coordinate public realm enhancements to North Acton;
	• Deliver new walking and cycling focused streets in new neighbourhoods.
	• Deliver a network of multifunctional green infrastructure comprising of new publicly accessible open and street greening.
	• Conserve and enhance the local character, specifically Old Park Royal, the residential, industrial and canalside character and the Grand Union Canal Conservation Area.
	• Deliver a high quality built environment that responds to the surrounding sensitive locations and supports local legibility by delivering a range of building heights to provide:
	  ○ Increased height, including tall buildings, around stations, in town centres and along railways in appropriate locations;
	  ○ lower heights adjacent to sensitive locations of existing residential neighbourhoods and publicly accessible open spaces.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal. This includes four key routes in Old Oak. These are: Old Oak High Street, Grand Union Street, Park Road and Wormwood Scrubs Street.	This recommendation has been superseded by the key route network recommended by the Old Oak North Development Framework Principles.

Other evidence base

Supporting Study	Recommendations
	• None

P7C1. North Acton Town Centre

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
North Acton Vision	Future development at North Acton will continue to progress along the same lines as the recent successfully completed regeneration in this area. New and improved connections to Old Oak Common Station and the core development area will be important to ensure North Acton is integrated into the wider regeneration. New development in the area will need to deliver a mixture of new public and private amenity spaces. North Acton station will likely require improvements to increase its capacity and access arrangements.
North Acton Key objectives	Support mixed use intensification, including residential, student housing, offices, light industrial, educational uses and potential for retail, leisure and hotel uses closer to North Acton Underground station; 2. should seek to provide flexible space for SME businesses; 3. Be high density in the vicinity of North Acton station; 4. Achieve the highest standards of design when in close to surrounding sensitive locations including existing residential premises and North Acton Cemetery; 5. Improve pedestrian and cycle connections between North Acton, Old Oak and Wormwood Scrubs and provide improved connections to communities

	south of the A40; 6. Improve the road network within North Acton to provide better facilities for pedestrians, cyclists and bus users. Ealing Council are currently assessing the potential to improve the Gyratory system; 7. Secure wholesale improvements to the public realm across North Acton and in particular on the one-way system along Victoria Road and Wales Farm Road; 8. Provide a mix of public and private amenity spaces 9. Support new access and new amenity space at the entrance to North Acton Underground station; and 10. Explore the opportunity to upgrade North Acton station to provide additional capacity and improved access to accommodate increased passenger numbers

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Regulation 18 Local Plan did not include cluster policies.		

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Policy should emphasise the importance of station improvements at North Acton in providing and the role it should play in the areas enhancement.	Transport for London (Group Planning)	No change proposed. OPDC considers Policy P7C1 provides significant emphasis for delivering improvements to North Acton Station.
North Acton Station Square should be referred to as "potential", not existing.	Transport for London (Group Planning)	No change proposed. North Acton Station Square is due to be completed in 2018. As such OPDC does not consider it appropriate to refer to the open space as potential.
General support for policy P7C1	Friary Park Preservation Group	Noted.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support for local heritage	Ealing Civic Society	Noted.

listing of The Castle Public House.		
Wording should be amended to provide flexibility for the delivery of a range of public realm typologies for the station square based on future detailed design.	Transport for London	Change proposed. Supporting text to P7C1 will be updated to make reference to alternative station public realm layout to ensure the design of public realm responds to future detailed design of improvements to North Acton Station.
Support for guidance for improvements to North Acton Station	Transport for London	Noted.
Guidance for green infrastructure in P7C1 is brief.	London Borough of Hammersmith and Fulham	No change proposed. Guidance for green infrastructure for North Acton and Acton Wells is provided in policy P7.
The Castle Public house is somewhat dilapidated with a future decline in business expected. New developments in the area include A3/A4 uses.	Citrus Group and Fuller Smith & Turner	No change proposed. Any loss of the Public House Use will be determined using Local Plan policy TCC5 and London Plan policy HC7 alongside all other relevant policies and material considerations.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	**Recommendations**
Supporting Study	**Recommendations**
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 6,000 new homes within North Acton and Acton Wells. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 4,600 new jobs in North Acton and Acton Wells. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic

	sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

North Acton District Energy Network Study	• The assessment concludes that it is not commercially or economically viable to deliver a strategic heat network • The review concludes that providing a network using gas fired CHP would be problematic as fossil fuel based systems are less carbon efficient than conventional grid electricity supply and high efficiency boilers. • To deliver carbon savings and meet Mayoral objectives, new development will have to use heat pumps and low carbon heat sources. This is more technically challenging and riskier commercially. • It may be possible for a small heat network to provide 2 or 3 new developments with low carbon heat and hot water. It may be possible to use a local aquifer to support this and to locate the energy centre in the basement of one of the developments. • Further work is required to test the flow rate and temperature of any aquifer. • The developers need to be approached to secure their support for

	a shared small scale local network and to agree where to cite a small energy centre. • Funding will need to be secured to develop a scheme. • An alternative zero carbon pathway for North Acton will be needed if a low carbon heat network cannot be provided.
North Acton Station Feasibility Study	• North Acton station is expected to be subject to significant additional demand due to the large-scale development that will surround the station. • The existing station is already straining under current demand and the current structures are ageing and in need of replacement/renewal; • As such reconfiguration to provide both additional capacity and step free access is key. • Providing access to the station from the north is fundamental as development comes forward. • Explore commercial opportunities • Ensuring DDA compliant access is provided • Increasing the capacity of the station

Retail and Leisure Needs Study	• There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years).
	• A new town centre hierarchy is identified:
	  - A new major town centre at Old Oak High Street;
	  - A new neighbourhood town centre at North Acton;
	  - A new neighbourhood town centre at Atlas Junction; and
	  - Consolidating and expanding the existing neighbourhood town centre at Park Royal Centre.
	• Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre
	• A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.

Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.
Victoria Road and Old Oak Lane Development Framework Principles	• Manage the transition between Old Oak and Park Royal by coordinating the mix of uses, built form and different character of the two areas. • Support the functioning of Strategic Industrial Locations (SIL). • Deliver mixed-use development in areas outside of SIL to support the local economy and deliver housing. • Focus active retail, social infrastructure, community and leisure uses in clusters around stations and town centres. • Retain and enhance existing residential areas. • Working positively and proactively with High Speed 2 Limited to address impacts on the public realm, open spaces, movement and residential amenity. • Support north-south movement along Victoria Road and Old Oak Lane through improvements to walking and cycling routes and the

	carriageway that mitigate impacts during the construction of High Speed 2 and in the longer-term. • Deliver a well-defined street with generous footpaths, segregated cycle lanes on main routes and positive and active frontages across the area. • Coordinate public realm enhancements to North Acton; • Deliver new walking and cycling focused streets in new neighbourhoods. • Deliver a network of multifunctional green infrastructure comprising of new publicly accessible open and street greening. • Conserve and enhance the local character, specifically Old Park Royal, the residential, industrial and canalside character and the Grand Union Canal Conservation Area. • Deliver a high quality built environment that responds to the surrounding sensitive locations and supports local legibility by delivering a range of building heights to provide: o Increased height, including tall buildings, around stations, in town centres and along railways in appropriate locations; o lower heights adjacent to sensitive locations of existing residential neighbourhoods and publicly accessible open spaces.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	**N/A**	N/A

Other evidence base

Supporting Study	Recommendations
	• None

P7C2. Old Oak Common Lane Station

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access

	arrangements at different times.
Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and

	housing choice for Londoners 3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban

	greening to create attractive resilient places that can also help the management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph	Policy and paragraph text

reference	
Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important

	and need to be considered in their own right and not just as edges of a place. Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in

	the first instance, within the OAPF area, then the West London sub-region.
PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
North Acton Vision	Future development at North Acton will continue to progress along the same lines as the recent successfully completed regeneration in this area. New and improved connections to Old Oak Common Station and the core development area will be important to ensure North Acton is integrated into the wider regeneration. New development in the area will need to deliver a mixture of new public and private amenity spaces. North Acton station will likely require improvements to increase its capacity and access arrangements.
North Acton Key objectives	Support mixed use intensification, including residential, student housing, offices, light industrial, educational uses and potential for retail, leisure and hotel uses closer to North Acton Underground station; 2. should seek to provide flexible space for SME businesses; 3. Be high density in the vicinity of North Acton station; 4. Achieve the highest standards of design when in close to surrounding sensitive locations including existing residential premises and North Acton Cemetery;

	5. Improve pedestrian and cycle connections between North Acton, Old Oak and Wormwood Scrubs and provide improved connections to communities south of the A40; 6. Improve the road network within North Acton to provide better facilities for pedestrians, cyclists and bus users. Ealing Council are currently assessing the potential to improve the Gyratory system; 7. Secure wholesale improvements to the public realm across North Acton and in particular on the one-way system along Victoria Road and Wales Farm Road; 8. Provide a mix of public and private amenity spaces 9. Support new access and new amenity space at the entrance to North Acton Underground station; and 10. Explore the opportunity to upgrade North Acton station to provide additional capacity and improved access to accommodate increased passenger numbers

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Regulation 18 Local Plan did not include cluster policies.		

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Plan should require the provision of an underground tunnel linking Old Oak Common station and the Old Oak Common Lane Overground station. This could be used for removal of spoil and then as a pedestrian connection between the two stations	West London Line Groups	No change proposed. Policy P7C2 requires proposals to continue Old Oak High Street, integrate with the station and with the station square to the west of the station. The exact nature of this connection could be over or under the London Overground Lines. It should be noted that TfL have explored both an underpass and overbridge option and recently consulted on their preferred option as an overbridge.
Midland Gate site can help deliver the Old Oak High Street Link	Castlepride Limited	Noted.
Final station design proposals for proposed Old Oak Common Lane	Transport for London (Group Planning)	Change proposed. The word 'potential' has been inserted into the text.

Overground station are still to be developed, and the station should be referred to as "potential".		
The supporting text (OCL.5) should not be too prescriptive and should recognise that development at Midland Gate could proceed in advance of Old Oak Common Lane Station.	Castlepride Limited	Change proposed. This wording has been removed.
Text needed to reflect that works on surface links between Old Oak Common Station and the potential Overground station is subject to ongoing work. Welcome reference seeking to ensure feasibility of route between Old Oak South and Acton Wells.	Transport for London (Group Planning)	Change proposed. Has been amended to reflect that works on surface links between Old Oak Common Station and the potential Overground station is subject to ongoing work.
Lack of government funding a concern.	Friary Park Preservation Group	Noted. Policy DI1 sets out the proposed approach to secure funding, including public sector funding.
Object to TfL proposals for a cycle/pedestrian bridge crossing, rather than a tunnel, at Old Oak Common Lane Station.	Nicky Guymer, Bruce Stevenson, Mark Walker, Dave Turner, Midland Terrace Residents, TITRA, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC is continuing to work with TfL to reflect outputs of the ongoing studies and consultation processes for the design and delivery of Old Oak Common Lane Station and associated connection between Acton Wells and Old Oak South.
Support proposed Old Oak Common Lane Overground Station	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Midland Terrace, Shaftesbury Gardens and Wells House Road are within the Old Oak Neighbourhood Area. Over-detailed policies will conflict with NPPF	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood

guidance on avoiding 'duplication' and also risks including policies that are inappropriate for a Local Plan which would not normally be revised within 5 years. P7 and P7C2 should not be strategic policies.	Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.

Regulation 19(2) consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Welcome changes made to policy in response to Regulation 19(1) consultation.	Castlepride Limited	Noted.
Midland Gate site should be identified as a location appropriate for a tall building in principle in figure 3.15	Castlepride Limited	No change proposed. The locations where tall buildings will be an appropriate form in principle have been identified through the methodology set out in OPDC's Tall Buildings Statement. This states that the location of existing residential neighbourhoods and public transport accessibility levels have

		been used to inform the locations where tall buildings will be an appropriate form in principle. Given the proximity of the existing residential areas, for the purposes of the Local Plan, Midland Gate has not been identified. However, all relevant policies and material considerations will be used to inform any planning application discussions, including viability considerations.
Infrastructure requirements placed on Midland Gate site will require the delivery of a tall building to ensure viable development of the site.	Castlepride Limited	No change proposed. Policies SP12 and DI1 provide guidance to ensure development contributes appropriately and proportionately towards required infrastructure. All relevant policies and material considerations will be used to inform any planning application discussions, including viability considerations.
Comments should be read in relation to Regulation 19(1) comments	Castlepride Limited	Noted.
Concerns regarding delivery of a bridge between Old Oak South and Acton Wells.	Thomas Dyton, Wells House Road Residents Association	Noted. Policy P7C2 provides guidance to deliver a continuous walking and cycling route between Old Oak South and Acton Wells which does not distinguish between a bridge of underpass. However, supporting text recognises that emerging feasibility studies by Transport for London identify that this connection may need to be delivered as cycling and footbridge. Should this be confirmed Local Plan policies D6 and EU5 will be used to ensure the bridge does not cause unacceptable harm to the amenity of existing residential uses.
Wording should be amended to provide flexibility for the delivery of a range of public	Transport for London	Change proposed. Supporting text to P7C2 will be updated to make

realm typologies for the station square based on future detailed design.		reference to alternative station public realm layout to ensure the design of public realm responds to future detailed design of improvements to North Acton Station.
Policy text should refer to the station as potential.	Transport for London	Change proposed. The word 'potential' has been inserted into the policy text.
Alternative supporting text wording describing the transport interchange role of Old Oak Common Lane Station should be provided.	Transport for London	No change proposed. OPDC considers the wording in the Local Plan to be sufficiently clear.
Support for recognition of the challenges to delivering a walking and cycling link between Old Oak South and Acton Wells.	Transport for London	Noted.
Proposals for the walking and cycling link between Old Oak South and Acton Well do not reflect the most up to date information.	TITRA	No change proposed. The guidance for the walking and cycling link set out in policy P7C2 is based on the most up to date information at time of writing.
P7C2 Vision should be amended to refer to Old Oak Common Lane Station being a gateway.	Aberdeen Standard Investments	No change proposed. P7 Vision is considered to appropriate set out the Local Plan aspirations for the cluster regarding connectivity.
Figure 4.25 is not clear and should include guidance from Acton Wells East site allocation.	Aberdeen Standard Investments	No change proposed. Acton Wells East site allocation does not provide spatial guidance so cannot be illustrated. Figure 4.25 is considered to be sufficiently clear for an illustrative diagram supporting policy P7C2.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 6,000 new homes within North Acton and Acton Wells. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 4,600 new jobs in North Acton and Acton Wells. • Phasing of development will likely begin in North Acton, Scrubs

	Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Old Oak Strategic Transport Study	• New London Overground Stations at Hythe Road and Old Oak Common Lane required.
Retail and Leisure Needs Study	• There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years).

	• A new town centre hierarchy is identified: - A new major town centre at Old Oak High Street; - A new neighbourhood town centre at North Acton; - A new neighbourhood town centre at Atlas Junction; and - Consolidating and expanding the existing neighbourhood town centre at Park Royal Centre. • Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.
Victoria Road and Old Oak Lane Development Framework Principles	• Manage the transition between Old Oak and Park Royal by coordinating the mix of uses, built form and different character of the two areas. • Support the functioning of Strategic Industrial Locations (SIL). • Deliver mixed-use development in areas outside of SIL to support the local economy and deliver housing. • Focus active retail, social infrastructure, community and leisure uses in clusters around stations and town centres. • Retain and enhance existing residential areas. • Working positively and proactively with High Speed 2 Limited to address impacts on the public realm, open spaces, movement and residential amenity. • Support north-south movement along Victoria Road and Old Oak Lane through improvements to walking and cycling routes and the carriageway that mitigate impacts during the construction of High Speed 2 and in the longer-term. • Deliver a well-defined street with generous footpaths, segregated cycle lanes on main routes and positive and active frontages across the area. • Coordinate public realm enhancements to North Acton; • Deliver new walking and cycling focused streets in new neighbourhoods. • Deliver a network of multifunctional green infrastructure comprising of new publicly accessible open and street greening. • Conserve and enhance the local character, specifically Old Park Royal, the residential, industrial and canalside character and the Grand Union Canal Conservation Area. • Deliver a high quality built environment that responds to the surrounding sensitive locations and supports local legibility by delivering a range of building heights to provide: o Increased height, including tall buildings, around stations, in town centres and along railways in appropriate locations; o lower heights adjacent to sensitive locations of existing residential neighbourhoods and publicly accessible open spaces.
Supporting Study	**Recommendations**

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	**N/A**	N/A

Other evidence base

Supporting Study	Recommendations
	• None

P8. Old Oak Lane and Old Oak Common Lane

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access

	arrangements at different times.
Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and

	housing choice for Londoners 3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban

	greening to create attractive resilient places that can also help the management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph	Policy and paragraph text

reference	
Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important

	and need to be considered in their own right and not just as edges of a place. Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in

	the first instance, within the OAPF area, then the West London sub-region.
PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Old Oak Lane Vision	Old Oak Lane will be a line of transition between the protected Strategic Industrial Location (SIL) of Park Royal and the mixed use regeneration area of Old Oak. The street will continue to be a busy connecting street between the A40 and Harlesden Town Centre. Immediately west of Old Oak Lane there are two large sites set to be used as HS2 work sites. Once HS2 has finished work, there is an opportunity to encourage the design and development of SIL appropriate uses here that help to buffer the existing Park Royal industrial area from existing and future mixed-use development to the east. Whilst Preferred Industrial Locations would still be supported, the delivery of Industrial Business Park uses along Old Oak Lane would help improve the character and types of use along this street. These two sites should be joined by a new bridge over the canal to allow better movement between both sites. Where the fronts of these sites meet Victoria Road there is an opportunity for uses that help to

	activate and define the street and improve the street environment. There should be new and enhanced access to the core Old Oak regeneration area from Old Oak Lane. This should be coupled with physical improvements to the street to better manage vehicle, pedestrian and cycle movements. There is a need to work with HS2 to mitigate construction logistics, where possible, impacts along this route.
Old Oak Lane Key Objectives	1. Continue to function as an important north-south connection road 2. Industrial land to the west of Old Oak Lane will continue to be protected as a Strategic Industrial Location (SIL); 3. Development brought forward on the HS2 works sites after their requirement for HS2 construction ceases should comply with the SIL land use policy requirements. There may be an opportunity to encourage the use of these sites as Industrial Business Park uses in the east of the sites, which could help act as a buffer between Old Oak and the wider Park Royal area such. The sites could form a location for research and development, high tech and/or clean tech uses. The redevelopment of these sites should investigate the potential for an alternative vehicular connection to the west of Old Oak Lane, to minimise traffic impact on the Old Oak Lane Conservation Area; 4. Enhanced access routes should be provided from Old Oak Lane to the Old Oak development area; 5. Improvements to the street may be required to mitigate increased transport use; 6. Proposals should be sensitive in scale to existing residential premises and Conservation Areas; 7. Enhancements should be made to the public realm on Old Oak Lane; and 8. Development should intensify employment uses along Old Oak Lane. There is an opportunity to secure active frontages as part of new development fronting onto Old Oak Lane

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Old Oak West place policy should encourage SIL uses but push for more appropriate light industrial or preferably commercial/office/business/studio use rather than dirty heavy industry	Resident	Noted. Policies P9 and P8 now provide guidance for Old Oak West. P9 identifies Channel Gate to continue to be designated as SIL but as an industrial innovation area at higher densities. These may include provision for small

		businesses, including start-ups, to help support innovation and enterprise.
Old Oak West (P9) should be identified as being appropriate for housing	1 Resident	No change proposed. Policies P9 and P8 now provide guidance for Old Oak West. P9 identifies Channel Gate to continue to be designated as SIL but as an industrial innovation area at higher densities. These may include provision for small businesses, including start-ups, to help support innovation and enterprise.
Mitre Bridge Industrial Estate should be merged into the Scrubs Lane place. It's not clear why this relatively modern estate is being proposed for housing development	Old Oak Interim Forum, 1 resident	Change proposed. The Mitre Bridge Industrial Estate is now part of the Scrubs Lane place, managed by policy P10. This proposes a mix of uses for the area reflecting the site's proximity to future public transport services.
The adopted West London Waste Plan includes future contingency for waste plants to be sited at nearby sites such as the HS2 / Atlas Road compound which we also regard as unacceptable.	TITRA	No change proposed. OPDC has adopted the West London Waste Plan. This is reflected in policy EU6. Policies D6, P8 and P9 require impacts of SIL uses, including waste management, to be mitigated in terms of residential amenity.
Northern HS2 compound could be used for social infrastructure in the long term	Workshop	No change proposed. Policies P9 and P8 now provide guidance for Old Oak West. P9 identifies Channel Gate to continue to be designated as SIL but as an industrial innovation area at higher densities.
Support uses that have a more positive relationship with the canal than standard industrial uses.	Canal and River Trust	Noted. Policies P3 and P9 provide guidance for delivering industrial uses that have a positive relationship with the canal through the delivery of positive frontages and improved public realm.
Figure 51 does not show Metroline Depot.	Harlesden Neighbourhood Forum	Noted. Figure supporting policy P8 identifies the

		Metroline Depot.
The Plan should recognise that Metroline bus depot site is detached from Park Royal and Old Oak - it should be treated as part of Harlesden.	Harlesden Neighbourhood Forum	No change proposed. The Metroline Depot is identified to be part of Old Oak Lane and Old Oak Common Lane place. Policy P8 provides guidance for the Depot and its relationship with surrounding areas in Harlesden.
Consider use of design codes to support sensitive development within context the conservation area	Historic England	Noted. Inclusion of a design code within the Local Plan is not considered to be appropriate given the Local Plan's strategic role. However, policies D8 and P8 provide guidance for managing the impact of development on heritage assets and their settings.
Encouraged to have an up to date conservation area appraisal as part of the evidence base	Historic England	Noted. OPDC has identified the need to review existing conservation area designations to consider potential updates. This will be carried out in 2018.
Illustrations in the Plan do not relate to London or show how development will help create a sense of place	Historic England	Noted. Illustrations are being removed from the Regulation 19 version of the Local Plan.
Support approach to Old Oak West	London Borough of Ealing	Noted. This approach is continued in policies P8 and P9.
The principal consideration must be protecting the amenity of current residents and maximising the potential of improved accessibility.	London Borough of Ealing	Change proposed. Policies D6 and P8 provides guidance for managing the impact of development on residential amenity. Policy P8 sets out improvements to the street network reflecting long-term development phasing.
Proposals should make every effort to limit traffic growth, divert lorries and mitigate its effects on Old Oak Lane to help make it a valued pedestrian environment	London Borough of Ealing, local resident	Change proposed. Policies D6 and P8 provides guidance for managing the impact of development on residential amenity. Policy P8 sets out improvements to the street network reflecting long-term development phasing.

Support Old Oak West as an exemplar for high value SIL intensification and in making a successful transition/buffer between industrial zones and conservation area, and rest of Old Oak	London Borough of Ealing	Noted. Policies P9 and P8 now provide guidance for Old Oak West. P9 identifies Channel Gate to continue to be designated as SIL but as a industrial innovation area at higher densities. These may include provision for small businesses, including start-ups, to help support innovation and enterprise.
Old Oak West is also a key to the realisation of the strategy for Grand Union Canal	London Borough of Ealing	Noted. Policies P3 and P9 provide guidance for delivering industrial uses that have a positive relationship with the canal through the delivery of positive frontages and improved public realm along the towpath.
The interaction of this site with Old Oak will be relatively limited and links to North Acton and the Shield site should be recognised	London Borough of Ealing	Noted. Policies P7 and P8 provide guidance for improving walking and cycling links along Old Oak Lane and Victoria Road to Acton Wells and North Acton. It also provides guidance for new east west links to Old Oak and Park Royal.
Maximisation/intensification is difficult to achieve in practice	London Borough of Ealing	Noted. OPDC's Park Royal Intensification Strategy identifies deliverable typologies for high density industrial development.
Conservation Area is facing prospect of long term freight consolidation centre.	Midland Terrace Resident's Group	Noted. Policies D8 and P8 provides guidance for managing the impact of development on heritage assets and their settings. OPDC has identified the need to review existing conservation area designations to consider potential updates. This will be carried out in 2018.
Alternative Places suggested, including a transitional zone. Revisions are requested to Old Oak West, North and South. Detailed policies could be developed to shape these.	Midland Terrace Resident's Group, Old Oak Interim Forum	Change proposed. The place of Old Oak West has been replaced by new places of Old Oak Lane and Old Oak Common Lane and Channel Gate. Policies P8 and P9 provide

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

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

impacts, including minimising construction traffic		impact of development on residential amenity.
Support for residential uses outside of SIL areas where it supports the functioning of commercial (but not heavy industrial) uses within the SIL	TITRA	Noted.
Should include an option that investigates allowing some traffic through Old Oak High Street or the north-south routes needed to develop the HS2 sites to relieve congestion on A4000.	TITRA	No change proposed. Policy SP4 provides guidance for the location of new and improved routes. HS2 construction routes are set out in relevant material of the HS2 London- West Midlands Act.
Support improvements to public realm, frontages, greening and built environment.	TITRA	Noted.
Should identify a series of smaller scale neighbourhoods that could develop their own character	TITRA, local resident	Change proposed. Policies P8C1 provides guidance for a smaller cluster at Atlas Junction.
Local residents' areas should be protected. Site should be better used for residential and/or mixed use development rather than heavy industrial uses.	TITRA, Wells House Rd Residents Association, local resident	Noted. Policies D6 and P8 provides guidance for managing the impact of development on residential amenity. Policies SP5 and P9 continues to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016).
Object to the siting of construction and freight consolidation centre. Plan should recognise impacts of SIL uses and attract uses which are compatible with residential uses.	TITRA, local resident, local resident	Noted. Policy P9 no longer refers to the development of a transport consolidation centre.
Should increase the green buffer strip between Old Oak Lane Conservation Area and SIL	Local resident	Change proposed. Policies P8 and P9 now seek to expand Old Oak Community Gardens.
Support development being sensitive and responsive to existing conservation areas.	Local resident	Noted.
Other possible uses at this location in Old Oak West should relate to film/TV industry uses.	Local resident	No change proposed. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting

		the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
Business park is preferred over heavy industrial uses (but not like Chiswick Park). This should be mixed use/finer grain and blend with existing character.	Local resident, workshop, local resident	No change proposed. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
Planning team should involve and work closely with the Island Triangle Residents Association on planning and conservation matters.	Local resident	Noted. OPDC continues to engage with community groups in accordance with OPDC's Statement of Community Involvement.
Old oak Lane's pollution levels continue to breach EU legal limits.	Local resident	Noted. OPDC's Air Quality Study provides spatial guidance for improving air quality within the OPDC area. Policy P8 reflects this for Old Oak Lane.
Atlas Road is becoming a lively hub. Want to promote vibrant uses on Old Oak Lane and Victoria Road by adding retail units and cultural centres.	Local resident	Change proposed. Atlas Junction is now proposed to be designated as a neighbourhood town centre in policies SP6 and P8.
The Station Road area is an important link area with Harlesden and should either become part of the new P11 suggested above, or be treated separately with as a specific non-industrial site to link with Harlesden.	Local resident	Change proposed. The Station Road area is now identified to be within the place of Old Oak Lane and Old Oak Common Lane. The Harlesden Bus Depot continues to be designated as SIL.
I am unclear how traffic would access a consolidation centre in the current location without creating even more traffic congestion.	Local resident	Noted. Policy P9 no longer refers to the development of a transport consolidation centre.
Edge of Old Oak West should be	workshop	No change proposed.

more mixed use with small units which are compatible with the area.		Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
Chiswick Park not be used as precedent	workshop	Change proposed. Chiswick Park is no longer identified as a precedent for Channel Gate.
Existing communities should be integrated in one Place	workshop	Change proposed. Policy P8 now provides a single place for existing residential communities along Old Oak Lane, Victoria Road and Old Oak Common Lane.
Old Oak West as transitional area	workshop, local resident	Noted.
SIL should be protected	workshop	Noted.
HS2 work sites development should be reconsidered after 2026, requirements/need will be clearer over time	workshop	No change proposed. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
Placemaking difficult on a large scale	workshop	Noted. The Local Plan provides guidance at a smaller station scale to support successful place-making.
Can proposed tunnel on Dutton (Dudding) Hill Line be moved	workshop	No change proposed. This is outside of the scope of the Local Plan.
Concern that new residents will not stay long or be integrated, feel/become part of the	workshop	Noted. Policy H3 provides guidance for delivering a housing mix to meet need.

community (i.e. there is a shuttle bus to Willesden Junction, First Central)		Policy P8 and P9 provide guidance for the location of new and improved open spaces to support social interaction.
Would like to see independent stores in North Acton	workshop	Noted. Policy SP6 and P7 designate a new neighbourhood town centre at North Acton to help deliver a range of retail uses and sizes.
Need social infrastructure to help people to meet/ integrate.	workshop	Noted. Policy TCC4 provides guidance for the delivery of social infrastructure.
Student accommodation can bring activity to an area i.e. new shops	workshop	Noted. Policy H10 provides guidance for delivering student accommodation to deliver sustainable communities.
Designate smaller estates in the area as part of one Conservation Area.	workshop	No change proposed. Designation of conservation areas is outside the scope of the Local Plan. OPDC's Heritage Strategy sets out proposals for new and updated conservation areas.
Concerned about the impact and length of construction period	workshop	Noted. Policies D6 and P8 provides guidance for managing the impact of development on residential amenity.
Midland Terrace should be included in Old Oak South or North so that communities can be more connected	workshop	Change proposed. Policy P8 now provides a single place for existing residential communities along Old Oak Lane, Victoria Road and Old Oak Common Lane.
Industrial area could be more mixed use	workshop, workshop, workshop	Noted. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support

		innovation and enterprise.
New bridge over the canal allows an opportunity for traffic to bypass Old Oak Lane	workshop	No change proposed. Policy P8 sets out improvements to the street network reflecting long-term development phasing. This continues to delivery Old Oak Lane as the main north-south route within the area.
Use Victoria Road to connect communities	workshop	Noted. Policies P7 and P8 provide guidance for improving walking and cycling links along Old Oak Lane and Victoria Road to Acton Wells and North Acton. It also provides guidance for new east west links to Old Oak and Park Royal.
Support for young professionals living in the Collective concept	workshop	Noted.
Extend Old Oak West further norht to Hillside, Acton Lane and Park Parade	Local resident	No change proposed. These areas are outside of the OPDC area.
Support land uses in Old Oak West	Local resident	Noted.
Support IBP uses on HS2 sites	Local resident	Noted.
HS2 work sites are a suitable location for freight consolidation	Local resident	Noted.
Agree with homes and jobs target for Old Oak West	Local resident	Noted.
HS2 sites are better suited to office uses and green spaces.	Local resident	Noted. Policies SP5 and P9 continue to designate the Channel Gate area as SIL for high quality high density industrial uses reflecting the need set out in OPDC's Industrial Land Review (2016). Supporting text to the policy recognises that this may include provision for small businesses, including start-ups, to help support innovation and enterprise.
Support criteria on conserving and enhancing the Conservation Areas	Local resident	Noted.
Policy is missing criteria on improving air quality	Local resident	Noted. OPDC's Air Quality Study provides spatial guidance for improving air quality within the OPDC

		area. Policy P8 reflects this for Old Oak Lane.
Suppor intensive SIL development with offices, innovation economy rather than heavy industrial uses	Local resident	Noted.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Should require HS2 to provide acoustic glazing and air conditioning for all houses on Wells House Road	Wells House Road Residents Association, Joanna Betts, Nsadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. HS2's mitigation and compensation arrangements are governed through HS2 Ltd's own arrangements and are not a matter for the Local Plan.
Retaining wall next to Wells House Road should be rebuilt as a green wall	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The exact nature of the reprovision of any wall is too detailed an issue for the Local Plan, but could be something covered through a Neighbourhood Plan.
The plan should note that Wells House Road will be at the centre of HS2 and other construction activities for the next 20-30 years	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan references the need to mitigate construction impacts in this Place. Other residential communities will also be at the centre of construction activities in this Place. It is not considered necessary to identify that a particular road will be adversely affected.
Development opportunity at Midland Gate should be recognised in the policy text.	Castlepride Limited	Change proposed. The supporting text has been amended to reflect development potential of Midland Gate.
Policy should be amended to not preclude potential for tall buildings on the Midland Gate site.	Castlepride Limited	Noted. OPDC has developed the Tall Buildings Statement to accord with Draft New London Plan policy D8. This sets out the process for how locations where tall buildings will be appropriate in principle. Midland Gate is not

		currently identified as an appropriate location. The Statement recognises that these locations may change and will inform future updates to the Local Plan.
Correct reference is Willesden Junction Bus Garage. Support retention of SIL designation and bus garage use for Willesden Junction Bus Garage.	Transport for London (Group Planning)	Change proposed. Wording in the Local Plan refers to Willesden Junction Bus Garage
Old Oak Lane/Victoria Road is currently the only road link between east and west parts of OPDC.	London Borough of Ealing	Noted.
Island Triangle area should not be surrounded by high rise development.	Bernie Timmins	Noted. Policy P8 identifies that generally lower heights directly adjacent to the Island Triangle are appropriate. This policy will be implemented alongside national guidance, London Plan policies and Local Plan policies SP9, D4, D5 and D6.
More attention should be paid to preservation of the railway cottages, and planning should not be granted for extensions or other proposals which damage the built character of the buildings.	Bernie Timmins	Noted. Policy P8 provides guidance to ensure the Old Oak Lane Conservation Area is conserved and enhanced. OPDC is also working with The Island Triangle Residents Associated to refresh the guidance for the Old Oak Lane Conservation Area in due course.
There is a need for new green spaces around the Island Triangle to act as a buffer between the HS2 works and residential buildings.	Bernie Timmins	Noted. Policy P8 seeks to enhance and expand the Old Oak Community Gardens adjacent to The Island Triangle and seeks to deliver linear spaces along Old Oak Lane.
Implementation of the Oaklands scheme and its contribution to the delivery of P8's vision should be referenced in supporting text paragraph OOL.3.	Queens Park Rangers Football Club and Stadium Capital Developments, Genesis	No change proposed. Following completion of the Oaklands development it will be depicted as an existing residential neighbourhood.
Former Railway Institute building, Goodhall industrial units and adjacent Network Rail land can be a gateway into Old Oak delivering mixed use development. This would	Raban Goodhall Ltd	Change proposed. Following development of further evidence base, the Goodhall industrial units have been removed from SIL. This will facilitate mixed use

require demolition of locally listed FRI building and existing industrial buildings		development.
General support for policy P8	Raban Goodhall Ltd, Victoria Hollertz, Friary Park Preservation Group	Noted.
P8 should made reference to its proximity future transport investment at Willesden Junction.	Raban Goodhall Ltd	No change proposed. Policy P8 vision makes reference to the place connecting Willesden Junction Station with Wormwood Scrubs and East Acton.
FRI building still requires improvement but costs of further improvements are expensive and affect viability of developing the site. Retention of the FRI building is more likely if adjacent sites are developed for mixed use.	Raban Goodhall Ltd	Noted. The Former Railway Institute building is located within the Old Oak Lane Conservation Area. As such it is part of a designated heritage asset. Proposals to develop designated assets are required to accord with NPPF paragraph 133 which requires local planning authorities to refuse total loss or substantial harm of designated heritage assets unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or viable reuse cannot be achieved. The building is also proposed for inclusion on OPDC's Local List.
Improvements to Old Oak Lane, should be particularly focused on improving public realm for walking and cycling and slowing/deprioritising vehicle movements such as a green buffer/large planters, wider pavements, cycle lane).	Victoria Hollertz	Noted. Policy P8 seeks to deliver a high quality public realm with improved walking and cycling infrastructure.
The route into the Channel Gate area should be via Atlas Road and a bridge over the canal. Channel Gate Road currently carves historic Goodhall Street in two. Old street pattern should be restored.	Victoria Hollertz, Nicky Guymer, Bruce Stevenson, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, TITRA, Midland Terrace Residents, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark	Noted. OPDC will work with HS2 and TfL to explore the potential to redirect construction traffic to help minimise impacts on to the Island Triangle residential neighbourhood.

	and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
Strongly support deliver of new and expanded green open spaces Old Oak Lane and Old Oak Common Lane	Victoria Hollertz	Noted.
Support improving air quality but policy needs to be stronger. Increasing the amount of waste Powerday can manage would be disastrous for residents and their health. Regulation has failed to address issues with local air quality, dust and odour.	Victoria Hollertz	Noted. Policy EU4 and table 6.1 provide policy for minimising air pollution and making a positive contribution to overall improvement in air quality. Policy EU5 provides policy for mitigating impacts of noise and vibration.
Strongly support this policy of lower building height near Old Oak Lane/Island Triangle and/or green buffer	Victoria Hollertz	Noted.
The promotion of building heights and high density development on the Westway Estate, and reference to a minimum rather than target/maximum number of homes is supported.	SEGRO	Noted.
Policy is unsound	Sarah Abrahart	No change proposed. OPDC considers the policy is sound.
Support having a separate place for Old Oak Lane and Old Oak Common Lane.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Support the recognition that there needs to be sensitive integration between existing and new development.	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy	Noted.

	Aspinall, Thomas Dyton	
A buffer zone is needed between the existing residential areas and new development in Old Oak South	Old Oak Interim Neighbourhood Forum, TITRA, Midland Terrace Residents, Lori Wiechec, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The policy identifies that generally lower heights directly adjacent to existing residential areas are appropriate. This policy will be implemented alongside national guidance, London Plan policies and Local Plan policies SP9, D4, D5 and D6.
Support the identification of Atlas Junction Neighbourhood town centre	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Should remove the restriction of town centre uses to sites only within the town centre. This approach is overly rigid.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The definition of a town centre hierarchy and provision of policies to deliver a sequential approach for the location of town centre uses accords with NPPF paragraph 24. This supports a town centre first approach. Taking an alternative approach would not be consistent with the NPPF or in general conformity with the London Plan.
P8c) for the Harlesden Bus Depot should not be considered strategic so that a neighbourhood plan can set the appropriate land uses for the site	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood

	Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
Designation of SIL has not been applied consistently. Explanation for releasing the Westway Estate from SIL but retaining Old Park Royal as SIL is required.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The release of SIL designation with the wider Old Oak area, including the Westway Estate is set out in London Plan Opportunity Area guidance, the Old Oak and Park Royal Opportunity Area Planning Framework and the Industrial Land Review supporting study. This reflects the development opportunities presented by Old Oak Common Station. This opportunity is reflected in OPDC's Industrial Lane Review which sets out an evidence based approach for the release of SIL.
If plans to widen Victoria Road are carried out, mitigating action should be	Douglas Hunt	Noted. Policy P8 seeks to mitigate the impacts of HS2 and construction within the

taken to replace lost trees and vegetation.		design of public realm. Policy EU1 and EU2 also seek to manage the loss of street planting and open spaces.
The costs and complexities of the Victoria and Westway estates means that viability will be more important on these sites than perhaps other sites in the area which have already been obtained for the purpose of redevelopment for an alternative use.	SEGRO	Noted.
A key challenge in the delivery of Victoria and Westway site allocations is the ability to provide new industrial space within the OPDC area, so that existing businesses at the estates can be decanted into new premises.	SEGRO	Noted. OPDC will work closely with land owners and tenants to retain or reprovide employment floorspace in new development.
Harlesden Bus Depot should be dedesignated as SIL due to: Isolation from wider Park Royal Considered to be part of Harlesden Adjacent to residential areas Adajcent to Harlesden Town Centre Shop units fronting onto Station Road within SIL Derelict building in west of depot Enviromental impact on surrounding areas Site needs to support movement to/from Old Oak along Station Road. Dedesignation of Harlesden Bus Depot from SIL would allow for site to be redeveloped in the long term if the bus depot could be satisfactorily relocated nearby. OPDC should allocate land elsewhere for the bus depot.	Harlesden Neighbourhood Forum	No change proposed. The Harlesden Bus Depot is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 to continue to provide strategic functions as a bus depot and rail freight site. This will help to deliver the following benefits: Secures sustainable transport services to serve existing and planned growth; Robust service provision supported accessibility provided by close proximity to Willesden Junction Station; Employment of over 300 people with training facilities. OPDC has met with Harlesden Neighbourhood Forum during the development of the Revised Draft Local Plan to respond to concerns regarding adjacency to residential uses, environmental impacts and provide a high quality

		frontage to Station Road. Policy P8 has been updated to address these concerns while continuing to retain the SIL designation. Revelant policy components include: - requiring active and positive frontages on to the public realm - ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.
Policy E1 would prevent delivery of shops or cafes on to Station Road. Positive frontages won't contribute to supporting movement to Old Oak.	Harlesden Neighbourhood Forum	No change proposed. Supporting text to policy P8 clarifies the form of town centre uses appropriate to delivery active frontages which will ensure consistency with E1 and conformity with London Plan SIL policies.
Recognise loss of SIL across west London is an issue and that the Mayor will be restricting this. Suggest dedesignation is a balancing act between uses and priorities. There should not be a blanket refusal to refuse dedesignation. Loss of 1.2 hectares of SIL would not significantly impact industrial land supply.	Harlesden Neighbourhood Forum	No change proposed. The Harlesden Bus Depot is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 to continue to provide strategic functions as a bus depot and rail freight site. This will help to deliver the following benefits: Secures sustainable transport services to serve existing and planned growth; Robust service provision supported accessibility provided by close proximity to Willesden Junction Station; Employment of over 300 people with training facilities. OPDC has met with Harlesden Neighbourhood Forum during the

		development of the Revised Draft Local Plan to respond to concerns regarding adjacency to residential uses, environmental impacts and provide a high quality frontage to Station Road. Policy P8 has been updated to address these concerns while continuing to retain the SIL designation. Revelant policy components include: - requiring active and positive frontages on to the public realm - ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.
The Mayor supports the SIL designation and retention of the Willesden Junction bus garage.	Mayor of London	Noted.
Sites at Goodhall Street should also be taken out of SIL to enable the comprehensive redevelopment of the area	Boyer Planning	Change proposed. The Industrial Land Review and Addendums have undertaken a review of additional sites within SIL to assess to determine whether additional changes to the SIL boundary are appropriate. The Goodhall Street sites are proposed to be released from SIL for mixed use development.
High Street connection across Old Oak Common Lane would have massive impact on neighbouring communities and tunnelled option would be a preference.	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan promotes an east-west connection between North Acton, the proposed Old Oak Common Lane station and the HS2 station. The Local Plan does not specify whether this would be a bridge or tunnel connection but any proposal would need

		to accord with planning policy, being well designed and appropriately responding to the surrounding context.

Regulation 19(2) consultation

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

Overview of Wells House Road Residents Association and recognition of support for other community group responses.	Thomas Dyton, Wells House Road Residents Association	Noted.
Channel Gate Road should be closed.	Bruce Stevenson	Noted. OPDC will work with HS2 and TfL to explore the potential to redirect construction traffic to help minimise impacts on to the Island Triangle residential neighbourhood. Policies D6, EU4, EU5 and P8 provides specific guidance to mitigate the impacts of noise and air pollution.
OPDC should work with HS2 to provide acoustic glazing and air filtering systems to all houses in Wells House Road. The sustaining wall should be rebuilt. OPDC should work with residents to discuss ideas to mitigate impacts.	Thomas Dyton, Wells House Road Residents Association	No change proposed. HS2's mitigation and compensation arrangements are governed through HS2 Ltd's own arrangements and are not a matter for the Local Plan. No change proposed. The exact nature of the reprovision of any wall is too detailed an issue for the Local Plan, but could be something covered through a Neighbourhood Plan.
Strong support for retention of SIL designation of the Willesden Junction Bus Depot	Transport for London	Noted.
Figure 4.27 should not show any new access onto Wormwood Scrubs.	Wormwood Scrubs Charitable Trust	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old

		Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land. Any amendments from future studies will be used to inform future versions of the Local Plan.
Wormwood Scrubs is more than a roadside space.	Wormwood Scrubs Charitable Trust	Noted. The Local Plan recognises the roles of Wormwood Scrubs in policy P12.
The heritage of Wormwood Scrubs should be referred to in Policy P8.	Wormwood Scrubs Charitable Trust	No change proposed. Policy D8 requires proposals to demonstrate how they

		respond to the OPDC heritage themes. This would apply to Wormwood Scrubs regardless of it not having a heritage designation.
Should be noted that early delivery of new housing and commercial space is being achieved at Oakland and the other sites offer an opportunity to deliver early development and assist wider development, including EMR site.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Policy SP9 provides guidance that supports the delivery of early development. A reference to a single specific site within the spatial vision is not considered to be required.
Support for green infrastructure guidance	London Borough of Hammersmith and Fulham	Noted.
Policy wording should be provided for SuDs	London Borough of Hammersmith and Fulham	No change proposed. Policy EU3 provides guidance for SuDS
Triangle site should be used of open space.	Grand Union Alliance	Noted. Policy P8C1 proposed the site for publicly accessible open space.
Continued designation of SIL at Willesden Junction Bus Depot restricts connections north and south of railways.	Grand Union Alliance	No change proposed. The Harlesden Bus Depot is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 to continue to provide strategic functions as a bus depot and rail freight site. This will help to deliver the following benefits: - Secures sustainable transport services to serve existing and planned growth; - Robust service provision supported accessibility provided by close proximity to Willesden Junction Station; - Employment of over 300 people with training facilities. OPDC has met with Harlesden Neighbourhood Forum during the development of the Revised Draft Local Plan to respond to concerns regarding adjacency to residential uses, environmental impacts and provide a high quality frontage to Station Road.

		Policy P8 has been updated to address these concerns while continuing to retain the SIL designation. Relevant policy components include: - requiring active and positive frontages on to the public realm - ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 2,800 new homes in Old Oak Lane and Old Oak Common Lane. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 1,600 new jobs in Old Oak Lane and Old Oak Common Lane. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes:

	• Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations
Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including: • 5 broad historic themes: o Grand Union Canal; o Rail heritage; o Industrial heritage; o Residential enclaves; and o Scrubland and open space. • a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets. • heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.
Industrial Land Review (and addendums)	• Protect SIL designation at the Willesden Junction Bus Depot • Release SIL designation at Goodhall Street Industrial Estate and Ursula Lapp Industrial Estate and require no-net loss of industrial floorspace.
Retail and Leisure Needs Study	• There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years). • A new town centre hierarchy is identified: - A new major town centre at Old Oak High Street; - A new neighbourhood town centre at North Acton; - A new neighbourhood town centre at Atlas Junction; and - Consolidating and expanding the existing neighbourhood town centre at Park Royal Centre. • Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.
Victoria Road and Old Oak Lane	• Manage the transition between Old Oak and Park Royal by coordinating the mix of uses, built form and different character of

Development Framework Principles	the two areas. • Support the functioning of Strategic Industrial Locations (SIL). • Deliver mixed-use development in areas outside of SIL to support the local economy and deliver housing. • Focus active retail, social infrastructure, community and leisure uses in clusters around stations and town centres. • Retain and enhance existing residential areas. • Working positively and proactively with High Speed 2 Limited to address impacts on the public realm, open spaces, movement and residential amenity. • Support north-south movement along Victoria Road and Old Oak Lane through improvements to walking and cycling routes and the carriageway that mitigate impacts during the construction of High Speed 2 and in the longer-term. • Deliver a well-defined street with generous footpaths, segregated cycle lanes on main routes and positive and active frontages across the area. • Coordinate public realm enhancements to North Acton; • Deliver new walking and cycling focused streets in new neighbourhoods. • Deliver a network of multifunctional green infrastructure comprising of new publicly accessible open and street greening. • Conserve and enhance the local character, specifically Old Park Royal, the residential, industrial and canalside character and the Grand Union Canal Conservation Area. • Deliver a high quality built environment that responds to the surrounding sensitive locations and supports local legibility by delivering a range of building heights to provide: o Increased height, including tall buildings, around stations, in town centres and along railways in appropriate locations; o lower heights adjacent to sensitive locations of existing residential neighbourhoods and publicly accessible open spaces.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	**N/A**	N/A

Other evidence base

Supporting Study	Recommendations
	• None

P8C1. Atlas Junction town centre

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Old Oak Lane Vision	Old Oak Lane will be a line of transition between the protected Strategic Industrial Location (SIL) of Park Royal and the mixed use regeneration area of Old Oak. The street will continue to be a busy connecting street between the A40 and Harlesden Town Centre. Immediately west of Old Oak Lane there are two large sites set to be used as HS2 work sites. Once HS2 has finished work, there is an opportunity to encourage the design and development of SIL appropriate uses here that help to buffer the existing Park Royal industrial area from existing and future mixed-use development to the east. Whilst Preferred Industrial Locations would still be supported, the delivery of Industrial Business Park uses along Old Oak Lane would help improve the character and types of use along this street. These two sites should be joined by a new bridge over the canal to allow better movement between both sites. Where the fronts of these sites meet Victoria Road there is an opportunity for uses that help to activate and define the street and improve the street environment.

	There should be new and enhanced access to the core Old Oak regeneration area from Old Oak Lane. This should be coupled with physical improvements to the street to better manage vehicle, pedestrian and cycle movements. There is a need to work with HS2 to mitigate construction logistics, where possible, impacts along this route.
Old Oak Lane Key Objectives	1. Continue to function as an important north-south connection road 2. Industrial land to the west of Old Oak Lane will continue to be protected as a Strategic Industrial Location (SIL); 3. Development brought forward on the HS2 works sites after their requirement for HS2 construction ceases should comply with the SIL land use policy requirements. There may be an opportunity to encourage the use of these sites as Industrial Business Park uses in the east of the sites, which could help act as a buffer between Old Oak and the wider Park Royal area such. The sites could form a location for research and development, high tech and/or clean tech uses. The redevelopment of these sites should investigate the potential for an alternative vehicular connection to the west of Old Oak Lane, to minimise traffic impact on the Old Oak Lane Conservation Area; 4. Enhanced access routes should be provided from Old Oak Lane to the Old Oak development area; 5. Improvements to the street may be required to mitigate increased transport use; 6. Proposals should be sensitive in scale to existing residential premises and Conservation Areas; 7. Enhancements should be made to the public realm on Old Oak Lane; and 8. Development should intensify employment uses along Old Oak Lane. There is an opportunity to secure active frontages as part of new development fronting onto Old Oak Lane

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Regulation 18 Local Plan did not include cluster policies.		

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support paragraph AJ.7	Victoria Hollertz	Noted.

General support for policy P8C1	Friary Park Preservation Group	Noted.
Policy P8C1 it too detailed to be a strategic policy within a Local Plan in light of NPPF para 185 as this location falls within the Old Oak Neighbourhood Area and will have guidance provided within a future neighbourhood plan. Policy P8C1 should be removed from the Local Plan.	Old Oak Interim Neighbourhood Forum, Midland Terrace Residents, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
The Old Oak Neighbourhood Forum will be working with the new occupants of the Collective building, the Oaklands development (construction starting 2018) and the Harlesden Neighbourhood Forum on plans for an area in which existing and new residential and commercial buildings need to be integrated sensitively.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. OPDC will support the development of any neighbourhood planning guidance for the area in accordance with national guidance and Policy DI3.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Should be noted that early delivery of new housing and commercial space is being achieved at Oakland and the other sites offer an opportunity to deliver early development and assist wider development, including EMR site.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. Policy SP9 provides guidance that supports the delivery of early development. A reference to a single specific site within the spatial vision is not considered to be required.
Support for green infrastructure guidance	London Borough of Hammersmith and Fulham	Noted.
Old Oak Common Lane Station does not have a supporting diagram.	Grand Union Alliance	No change proposed. Figure 4.25 is the diagram for policy P7C2.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 2,800 new homes in Old Oak Lane and Old Oak Common Lane. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 1,600 new jobs in Old Oak Lane and Old Oak Common Lane. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making

	• Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations
Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including: • 5 broad historic themes: o Grand Union Canal; o Rail heritage; o Industrial heritage; o Residential enclaves; and o Scrubland and open space. • a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets. • heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.
Retail and Leisure Needs Study	• There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years). • A new town centre hierarchy is identified: - A new major town centre at Old Oak High Street; - A new neighbourhood town centre at North Acton; - A new neighbourhood town centre at Atlas Junction; and - Consolidating and expanding the existing neighbourhood town centre at Park Royal Centre. • Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.
Victoria Road and Old Oak Lane Development Framework Principles	• Manage the transition between Old Oak and Park Royal by coordinating the mix of uses, built form and different character of the two areas. • Support the functioning of Strategic Industrial Locations (SIL). • Deliver mixed-use development in areas outside of SIL to support the local economy and deliver housing. • Focus active retail, social infrastructure, community and leisure uses in clusters around stations and town centres.

	• Retain and enhance existing residential areas.
	• Working positively and proactively with High Speed 2 Limited to address impacts on the public realm, open spaces, movement and residential amenity.
	• Support north-south movement along Victoria Road and Old Oak Lane through improvements to walking and cycling routes and the carriageway that mitigate impacts during the construction of High Speed 2 and in the longer-term.
	• Deliver a well-defined street with generous footpaths, segregated cycle lanes on main routes and positive and active frontages across the area.
	• Coordinate public realm enhancements to North Acton;
	• Deliver new walking and cycling focused streets in new neighbourhoods.
	• Deliver a network of multifunctional green infrastructure comprising of new publicly accessible open and street greening.
	• Conserve and enhance the local character, specifically Old Park Royal, the residential, industrial and canalside character and the Grand Union Canal Conservation Area.
	• Deliver a high quality built environment that responds to the surrounding sensitive locations and supports local legibility by delivering a range of building heights to provide:
	  ○ Increased height, including tall buildings, around stations, in town centres and along railways in appropriate locations;
	  ○ lower heights adjacent to sensitive locations of existing residential neighbourhoods and publicly accessible open spaces.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	**N/A**	N/A

Other evidence base

Supporting Study	Recommendations
	• None

P9. Channel Gate

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Old Oak Lane Vision	Old Oak Lane will be a line of transition between the protected Strategic Industrial Location (SIL) of Park Royal and the mixed use regeneration area of Old Oak. The street will continue to be a busy connecting street between the A40 and Harlesden Town Centre. Immediately west of Old Oak Lane there are two large sites set to be used as HS2 work sites. Once HS2 has finished work, there is an opportunity to encourage the design and development of SIL appropriate uses here that help to buffer the existing Park Royal industrial area from existing and future mixed-use development to the east. Whilst Preferred Industrial Locations would still be supported, the delivery of Industrial Business Park uses along Old Oak Lane would help improve the character and types of use along this street. These two sites should be joined by a new bridge over the canal to allow better movement between both sites. Where the fronts of these sites meet Victoria Road there is an opportunity for uses that help to activate and define the street and improve the street environment.

	There should be new and enhanced access to the core Old Oak regeneration area from Old Oak Lane. This should be coupled with physical improvements to the street to better manage vehicle, pedestrian and cycle movements. There is a need to work with HS2 to mitigate construction logistics, where possible, impacts along this route.
Old Oak Lane Key Objectives	1. Continue to function as an important north-south connection road 2. Industrial land to the west of Old Oak Lane will continue to be protected as a Strategic Industrial Location (SIL); 3. Development brought forward on the HS2 works sites after their requirement for HS2 construction ceases should comply with the SIL land use policy requirements. There may be an opportunity to encourage the use of these sites as Industrial Business Park uses in the east of the sites, which could help act as a buffer between Old Oak and the wider Park Royal area such. The sites could form a location for research and development, high tech and/or clean tech uses. The redevelopment of these sites should investigate the potential for an alternative vehicular connection to the west of Old Oak Lane, to minimise traffic impact on the Old Oak Lane Conservation Area; 4. Enhanced access routes should be provided from Old Oak Lane to the Old Oak development area; 5. Improvements to the street may be required to mitigate increased transport use; 6. Proposals should be sensitive in scale to existing residential premises and Conservation Areas; 7. Enhancements should be made to the public realm on Old Oak Lane; and 8. Development should intensify employment uses along Old Oak Lane. There is an opportunity to secure active frontages as part of new development fronting onto Old Oak Lane

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
See Regulation 18 consultation in Policy Formulation Report for P8 Old Oak Lane & Old Oak Common Lane regarding the previous Old Oak West place.		

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Principal consideration in developing Channel Gate should protecting amenity of current residents and	London Borough of Ealsisng	No change proposed. Policy P9 vision and policy seek to respond to and mitigate impacts on adjacent

maximising potential.		residents. Policy D6 also provides guidance to provide an appropriate standard of amenity.
Channel Gate can act as an exemplar for SIL intensification and in making a successful transition between industrial zones and the core of Old Oak.	London Borough of Ealing	Noted. Policy P9 vision reflects this aspiration.
Policy acknowledges key responsibility to conservation area at Old Oak Lane.	London Borough of Ealing	Noted.
Policies to preserve and enhance Plantagenet House are unsound as HS2 Ltd was granted powers demolish this building as part of the HS2 Act.	HS2 Ltd.	Change proposed. OPDC's Heritage Strategy identifies Plantagenet House to have heritage significance that warrants its proposed designation as a locally listed heritage asset. Establishment of the Local List was subject to public consultation in 2018. OPDC is aware of the powers resulting from the HS2 Act and continue to consider that Policy P9 and D8 are consistent with NPPF paragraph 135 regarding non-designated heritage assets. However, OPDC has amended the supporting text to policy P9 to provide further information for how conserving and enhancing Plantagent house could be implemented to reflect powers of the HS2 Act.
Policy should explicitly state that the area will be subject to a specific planning framework when released by HS2.	London Borough of Ealing	No change proposed. OPDC will consider whether additional supplementary planning guidance is suitable for Channel Gate in due course. OPDC's Local Development Scheme will reflect this work.
Island Triangle should be improved and public open space should be provided. Railway cottages should be enhanced to add character to the area.	Tim Potter	Noted. Policy P8 provides guidance to enhance the Island Triangle.

Strongly support policy to activate area for meanwhile uses	Victoria Hollertz	Noted.
There should be improved noise and air quality mitigation and screening to reduce impact from retained strategic freight use.	Victoria Hollertz	Noted. Policies D6, P9 and P8 provide guidance to this effect.
Designation of parts of Channel Gate place as SIL is inflexible and conflicts with other policies.	Nicky Guymer, Bruce Stevenson, Mark Walker, Old Oak Interim Neighbourhood Forum, Dave Turner, Midland Terrace Residents, TITRA, Nye Jones, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Channel Gate is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 and to continue to provide strategic functions as a rail freight site. This is reflected in OPDC's Industrial Land Review which sets out an evidence based approach for the release and retention of SIL.
The eastern part of Channel Gate forms part of the designated Old Oak Neighbourhood Area. Over-detailed policies will conflict with NPPF guidance on avoiding 'duplication' and also risks including policies that are inappropriate for a Local Plan which would not normally be revised within 5 years.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering

		the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
P9 is not justified as it lacks guidance for building heights.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Guidance for building heights is provided in Policy P9. This reflects the evidence base for buildings heights set out in the Grand Union Canal Heights and Massing Note and the Park Royal Intensification Strategy. It also reflects the development timescales for Channel Gate. HS2 currently safeguards the area for construction activities until 2026. In preparation for the release of safeguarding, OPDC may consider the need for additional evidence base and building heights guidance.
Support for the creation of a permeable street network in Channel Gate	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Question if waste sites on Channel Gate have been properly regulated.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Any waste management facilities will need to accord with policy EU6.
Support designation of part of Channel Gate place within the Old Oak Neighbourhood Area.	TITRA, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	Noted.

	Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Plantagenet House and Windsor House will be handed back these as cleared sites following end of construction. Policies should be flexible. Mixed use development would bring benefits and should be supported. The sites fronting Victoria Road should be released from SIL.	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	No change proposed. The Strategic Industrial Location designation for the place of Channel Gate, including Plantagenet House and Windsor House, is critical to delivering OPDC's Local Plan's Spatial Vision to strengthen and intensify Park Royal. This importance is illustrated by its designation as a site allocation and is key to enabling OPDC in meeting its employment targets with the provision of 7,600 new jobs. This significant level of employment reflects the current need for industrial floorspace as set out in OPDC's Industrial Land Review. The Industrial Land Review Addendum has also undertaken a robust assessment for managing the release of Strategic Industrial Location. This sets out a number of criteria which OPDC does not consider the sites of Plantagenet House and Windsor House would meet. Therefore Plantagenet House and Windsor House are proposed to continue to be designated as SIL for the plan period.
Want to see firm plans for the closure of Channel Gate Road and access to the railway yard solely by Atlas Road after HS2's work is complete. This is single most important way to protect and enhance the Old Oak Conservation Area.	Nye Jones; Gail Robinson; Natasha Salkey; Rachel Ritfield; Ciara Solmi; Bernie Timmins; Jane Dreaper; M.Szoke; James Trew; Stephanie Hewett; Eileen Hannington; Marta Donaghey; Jamie Sutcliffe; TITRA; Pablo Navarrette; Midland Terrace Residents; Mark Walker; Jason Salkey; Elaine Gristock; David Turner; Nicky Guymer; Grand Union Alliance	Noted. OPDC will work with HS2 and TfL to explore the potential to redirect construction traffic to help minimise impacts on to the Island Triangle residential neighbourhood. Policies D6, EU4, EU5 and P8 provides specific guidance to mitigate the impacts of noise and air pollution.
Welcome the Policy P9 vision for a strengthened connection / bridge between Atlas Road and the Channel Gate Yard.	Rachel Ritfield; James Trew; Eileen Hannington; Mark Walker	Noted.

Issues link to lorries, parking enforcement, flytipping, danger of crossing on Channel Gate Road.	Jane Dreaper; Stephanie Hewett	Noted. No change proposed. The Victoria Road and Old Oak Lane Development Principles document has considered measures to mitigate impacts of traffic and improve pedestrian and cycling movement. These recommendations have been incorporated into the revised Local Plan. OPDC's remit is limited to its role as a local planning authority. Parking Enforcement and waste collection remain the responsibility of the relevant local authority.
Children have no place to play safely and are at risk playing on the side of the road, we have no local park space. Channel Gate road should be permanently closed and transformed into a park.	Stephanie Hewett	Noted. Policy P8 seeks to deliver a high quality, well connected, network of multifunctional publicly accessible open spaces, including enhancements to and expansion of the Old Oak Community Gardens adjacent to The Island Triangle. Proposals for development should also contribute positively to maximising opportunities for high quality multifunctional play in line with Policy D9.
The policy does not state what the lower heights are. TITRA regards this section of Policy P9 as inadequate until guideline heights are discussed openly, consulted on and then included.	TITRA	No change proposed. Development of Channel Gate will take place in the longer term. Therefore provision of detailed heights guidance is not considered appropriate at this point in time.
There is an opportunity to create a buffer between Park Royal and the heritage residential areas by fine grained employment activities and new residential as appropriate.	Grand Union Alliance	Noted. Policy P8 seeks to enhance and expand the Old Oak Community Gardens adjacent to The Island Triangle. Any development would need to accord with Policy D8 to conserve and enhance the Old Oak Lane Conservation Area.
The planned bridge over the Grand Union Canal should be moved to the east, so the line of its road more naturally becomes part of a A4000 bypass, to the west of the Island Triangle estate.	John Cox	Noted. OPDC will work with HS2 and TfL to explore the potential to redirect construction traffic to help minimise impacts on to the Island Triangle residential neighbourhood. Policies D6 and P8 provides specific guidance to mitigate the impacts of noise and air pollution.
Policies should provide sufficient flexibility for the site (Plantagenet, Stuart, Windsor House) to contribute positively to OPDC's strategic objectives.	Inner City Properties Limited; Cedarlane Limited; Consort Property Limited; Heartwell Limited and Ravensdown Limited	No change proposed. The Strategic Industrial Location designation for the place of Channel Gate, including Plantagenet House and

A mix of uses including employment, residential and other uses will facilitate intensification and meet other Local Plan objectives. Request that frontage is de-designated from SIL		Windsor House, is critical to delivering OPDC's Local Plan's Spatial Vision to protect, strengthen and intensify Park Royal. This importance is illustrated by its designation as a site allocation and is key to enabling OPDC in meeting the employment targets set by the Mayor, with the potential to deliver 7,600 new jobs. There is likely to be an ongoing demand for industrial space as set out in OPDC's Industrial Land Review. The Industrial Land Review Addendum has also undertaken a robust assessment for assessing further SIL boundary changes based on a number of criteria. OPDC does not consider the sites of Plantagenet House and Windsor House is suitable for release when assessed against this criteria, therefore Plantagenet House and Windsor House are proposed to continue to be designated as SIL for the plan period.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period with 7,600 new industrial jobs provided within Channel Gate after 2026. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science

	activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  o Grand Union Canal;
	  o Rail heritage;
	  o Industrial heritage;
	  o Residential enclaves; and
	  o Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Industrial Estates Study	Recommendations for how Park Royal can improve its competitive position, including: • protecting industrial land; • ensuring a greater diversity of unit sizes; • addressing infrastructure issues; and • improving access to amenities.
Industrial Land Review (and addendums)	The recommendations for policy and delivery focus on protecting and maximising the contribution of industrial uses in the OPDC area to support a robust local and regional economy. They are divided into four overarching groups to address the conclusions of the report: *Protect* – acknowledges the high demand for industrial land in the OPDC by focusing on how local planning policies should protect industrial land and industrial businesses within Park Royal. • Protect industrial uses in Park Royal SIL • Reduce non-conforming uses in Park Royal SIL • Return Park Royal HS2 construction sites to SIL • Development adjacent to Park Royal SIL *Intensify* - focuses on planning policies to use the remaining industrial land efficiently and provide industrial space to more businesses. • Efficient use of industrial land

	• Reduce road congestion • Intensification pilot projects *Expand* – recommends options for the Local Plan and broader strategies to expand the supply of industrial space in the area in response to increasing demand. • Adjust Park Royal SIL boundary • Light industrial floor space in Old Oak • Manage industrial floorspace within the region • Industrial space design and planning guidance *Support* - focuses on how the OPDC can support the local industrial economy and businesses by facilitating the relocation of displaced businesses within the area and supporting businesses to capture procurement opportunities from development at Old Oak. • Business relocation • Low carbon transition • Local procurement • Business listing and online forum
Park Royal Atlas	• There are a diverse range of businesses in the area • At the time of the survey, 19,934 active workspaces were identified. • A broad range of business sectors were identified, including breweries, bakeries, metal workshops, storage, contractors, joiners, hospitals, schools, publishers, film studios, software developers, garages, car sales, pubs, hotels, jewellers, cobblers, lawyers, accountants, spice merchants, medical suppliers, churches and artist studios. • 30% of workplaces are small office type spaces, though workplaces in large warehouses make up 63% of the total floor area. • The central areas of Park Royal stand out for having the greatest diversity of buildings and space types. Many of these are used by micro businesses which count for 75% of workplaces
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal. This includes a long-term aspirational crossing over to Park Royal West.
Victoria Road and Old Oak Lane Development Framework Principles	• Manage the transition between Old Oak and Park Royal by coordinating the mix of uses, built form and different character of the two areas. • Support the functioning of Strategic Industrial Locations (SIL). • Deliver mixed-use development in areas outside of SIL to support the local economy and deliver housing. • Focus active retail, social infrastructure, community and leisure uses in clusters around stations and town centres. • Retain and enhance existing residential areas. • Working positively and proactively with High Speed 2 Limited to address impacts on the public realm, open spaces, movement and residential amenity. • Support north-south movement along Victoria Road and Old Oak Lane through improvements to walking and cycling routes and the carriageway that mitigate impacts during the construction of High Speed 2 and in the longer-term.

	• Deliver a well-defined street with generous footpaths, segregated cycle lanes on main routes and positive and active frontages across the area.
	• Coordinate public realm enhancements to North Acton;
	• Deliver new walking and cycling focused streets in new neighbourhoods.
	• Deliver a network of multifunctional green infrastructure comprising of new publicly accessible open and street greening.
	• Conserve and enhance the local character, specifically Old Park Royal, the residential, industrial and canalside character and the Grand Union Canal Conservation Area.
	• Deliver a high quality built environment that responds to the surrounding sensitive locations and supports local legibility by delivering a range of building heights to provide:
	  ○ Increased height, including tall buildings, around stations, in town centres and along railways in appropriate locations;
	  ○ lower heights adjacent to sensitive locations of existing residential neighbourhoods and publicly accessible open spaces.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	N/A	N/A

Other evidence base

Supporting Study	Recommendations
London Industrial Land Demand (2017)	Update Industrial Land release benchmarks suggest that for the period 2016-41 a total of 233 ha of industrial land can be released, or an average of 9.3 ha per annum. This is a significantly lower level of release than set out in the 2011 Industrial Land Benchmark study and can be explained by industrial land being released at faster than the benchmark guidance and by the fact that the current GLA projections show industrial employment in London declining at a much slower rate than those which informed the 2011 study. This implies much tighter policy is needed if industrial land releases are to be restricted to the Benchmark targets. If industrial land were to continue to be released at the same rate as in recent years then this would result in the loss of 1,630 ha on industrial land. There is already planned release of 838 ha of industrial land in the pipeline and if land identified for Crossrail 2 and the Bakerloo Line Extension were factored in this would rise to 1,277 ha. There is potential for the Benchmark release total to be raised through a combination of intensification, substitution and co-location of industrial activity. Our Intensification and Substitution scenario estimated that the Benchmark Release total could be increased from 233 ha to 783 ha if such approaches could be successfully implemented.

	Given the considerable tightening of the industrial land market in London the current categorisation of Boroughs into Managed, Limited and Restrictive should be revisited. Boroughs should seek to create additional capacity for industrial activity through intensification. This should apply to all Boroughs and in particular to those which are identified as having a positive net demand. Providing capacity does not necessarily mean providing additional land for industrial activity. It can be achieved through intensification of use, providing more capacity for industrial activity on the same site area. This applies equally to those Boroughs that seek release above the benchmark levels. This can be justified if it can be shown that additional capacity for industrial activity has been created through intensification. Secondly Boroughs need to work together and consider industrial demand at the level of their sub-regional property market area. Where one Borough has a positive demand for industrial land and a neighbouring Borough has a surplus of land to release, then there should be some reallocation between Boroughs to ensure demand is met at the property market level. Thirdly there may be some limited scope for demand to be met by transfers between property market areas. As noted in the report there are some signs that occupiers and developers who would previously only consider west London locations are now looking to the east. But any reallocations between Boroughs need to be included in both Borough's plans to ensure demand is met at the London level. Other policy recommendations: *Public Sector Enabling Role* A principal objective of industrial land policy in London, as set out above, should be to encourage intensification of use. There are signs that new innovative and more intensive forms of industrial development are emerging – and these should be promoted through policy. But there may be barriers that may limit the level of intensification that is delivered through the market alone. Many industrial estates have highly fragmented ownership patterns that hinder the type of comprehensive redevelopment that is needed to optimise industrial land use density on a site. Industrial developers may also lack the incentive to redevelop more intensively on a site by site basis as the full value of intensification (in terms of land released for non-industrial development) may not accrue to industrial developers. The public sector may therefore need to intervene in the land assembly process to ensure that the potential benefits that could be realised through intensification are actually realised. *Strengthen Policy and Release Guidance* The stock of industrial land in London is shrinking rapidly and existing policy does not seem to be controlling releases to benchmark levels. The 2011 Industrial Land Demand report recommended improving monitoring to ensure releases were not in excess of Benchmarks. That release has continued well in excess of benchmark guidance

	suggests this cannot be just down to poor monitoring. There therefore needs to be a strengthening of policy and a commitment from both the GLA and Boroughs at the highest level to ensure that the Benchmark Release guidance, with flexibility to allow for intensification, is actually adhered to. *Article 4* Local planning authorities are required to plan for "The locational and premises requirements of particular types of business". But it is increasingly difficult for local authorities to meet this requirement as the supply and range of premises is eroded by permitted development rights for change of use. Boroughs should therefore give consideration to the use of Article 4 Directions to preserve B1a, B1c and B8 from being changed to residential use. This is necessary to maintain
London Industrial Land Supply and Economy Study (2015)	Key results and findings include: *Industrial Land Baseline* • In 2015 there is 6,976 hectares (ha) of industrial land in London of which 4,553ha is core industrial use (65%); 1,887ha is in wider industrial use (27%) and 547ha is vacant land (8%). There was approximately 21 million m2 of industrial floorspace in London in 2012. • From 8,282ha recorded in 2001, the stock of industrial land has declined steadily to 7,841ha in 2006, 7,505 in 2010 and 6,976ha in 2015; This equates to a contraction of 1,306ha or 16% over the whole period and a 7% contraction in the last five years. • Notably, at sub-regional level the Central subregion recorded a significantly higher rate of release of / decline in industrial land in the last five years at 25% compared with the other subregions which recorded declines of around 6% in each case. • The development pipeline and proposed future release rates of industrial land appear to correspond with recent London-wide trend rates of release, suggesting that these rates will persist in future years. • Past trends in industrial land release show an accelerated rate of release significantly above the SPG target rates of release. The trend rate of release for 2010 to 2015 is 105ha per annum, compared with the SPG recommended rate of release of 36.6ha per annum. If these trends continue then the total stock of industrial land in London will decline from around 6,980ha in 2015 by a further 2,300ha to around 4,700ha in 2041, a 33% decline over this period. This is around 1,900ha more than the SPG 2031 industrial land target projected to 2041 (around 6,500ha). *Businesses and Employment* • Employment in industrial occupations in London was estimated at 560,000 jobs in 2014, 46% of which are in designated areas, with 76,000 industrial businesses being recorded. At 7.4 workers per business and with 90% of businesses employing 0-9 people, such a distribution is found to be similar to the distribution for all businesses in London. • It's estimated that 82% of all industrial businesses lie within designated areas, suggesting that either the size of industrial businesses in non-designated areas is significantly larger than in the

	designated areas and / or there are inaccuracies over the way that industrial employment is calculated. This would benefit from further investigation. • Industrial employment in London in the period 2010 to 2015 is estimated to have increased by around 4%, which could represent a reversal of the longer-term trend of decline in industrial employment. Property Market Areas and indicators • Of the approximately 21 million m2 of industrial floorspace in London in 2012, the Park Royal / A40 / Heathrow market contains the highest proportion at 32%. • Available industrial floorspace (2 million m2) represents 10% of total estimated floorspace, exceeding the widely accepted guideline frictional vacancy rate of 8% for effective operation of the market. The availability rate in Outer London also exceeds this at around 12%, with the Thames Gateway recording the highest rate of the property market areas at 14%. • London-wide industrial rental values average £110 per m2, peaking at an average of £123 per m2 in the Park Royal / A40 / Heathrow and Wandle Valley areas and falling to £91 per m2 in the Thames Gateway. • Industrial land values average £4.9m per ha London-wide, with the Wandle Valley having the highest average industrial property values at around £6.2m per ha. Reflecting rents, the Thames Gateway has the lowest at £1.0m per ha (£2.5 per acre). Residential land values reflect a similar pattern to that of industrial with the highest values in the South and West subregions / property market areas and lowest in the East and North. By property market, residential land values range from between 2.6 to 7.6 times industrial land values (Park Royal / A40 / Heathrow and Central Services Circle respectively) which means that there is considerable market pressure to release industrial land for residential development. Industrial Capacity in the Inner South East • The supply of industrial land in the inner South East is estimated to be around 4,882ha, or, in comparison, 70% of the total industrial land supply of London. The largest concentration of land is in the north quadrant, while the largest in London is in the Park Royal / A40 / Heathrow property market. • The rate of industrial land loss in the inner South East is slower than that seen in London. Release of industrial land has been slowest in the inner South East quadrants that are adjacent to the London property markets which have the highest rates. 173 • This could indicate that a process of out migration is occurring with businesses moving from London to locations in the inner South East. This is further represented by the large difference in the total rates of industrial land stock release for the inner South East (-4%) and for London (-16%) *Evidence on Market Failure and Flexibility* Research and conclusions on possible factors that could cause market failure and / or affect the flexibility and ability of industrial businesses to respond to a reduced supply of industrial land are as follows: • Generally there does not appear to be strong evidence so far to suggest that reductions in availability of land and property have a direct correlation with increases in rents at a local level.

	• Case studies suggest that at a local level significant shifts to non-industrial uses can undermine the integrity of industrial areas, and care is needed in planning for and managing change in industrial areas. • There is some evidence to suggest that industrial activities are responding to increased rents and reduced supply by increasing employment densities. • Analysis of changes in employment in recent years in industrial sectors suggests that there could be an emerging pattern of sectors that are more sensitive to London and / or central London locations tending to remain or grow in London, and other sectors that are less sensitive to location will tend to leave London. • In particular it is possible that the scale of a number of industrial activities will tend to be correlated to London's overall population as they directly serve the population. • Data on rates of change of industrial businesses in London suggests that there is a degree of flexibility in the economy and the industrial sector specifically that may not have been appreciated previously. • Broad-brush analysis suggests that overall there is potential for the adjacent South East region to (continue to) accommodate overspill demand from London (or demand transferring to the area as supply contracts in London). • It is likely that if activities servicing core London markets are forced to relocate out of London, either to the adjacent South East or further afield, then total travel miles, congestion and consequent carbon emissions will increase. • There is evidence that some industrial businesses require space for small-scale production and prototyping and rely on access to a skilled workforce, specialist manufacturing activities and agglomeration benefits found in London. These businesses may find it harder to be economically viable if forced to relocate outside London. 8.3.2 The research carried out for this report, together with other data and information, suggests that overall there is a degree of flexibility in the industrial land market and industrial activities to respond to contractions in industrial land supply. Key mechanisms allowing this include potential for some industry to relocate to the wider adjacent South East (or in suitable cases further afield) and probably to a lesser degree there may be potential for intensification of industrial activities on existing land. *Implications for Industrial Land Policy* Review of context, market failure and market mechanisms suggests that if sufficient industrial land can be provided / protected within and around London continued release of industrial land in London may be possible. However the rates of release seen over the last five years appear to be excessive and a more moderate rate of release is probably more appropriate. London appears to be heading towards a situation in which most of its activities located in industrial areas will be associated with servicing the rest of London's economy and population. With the projected significant growth in London's population and economy

	over coming decades and the likely strong positive correlation between these activities and London's population it appears likely that at some point, potentially within the life of the current London Plan, there will be a case to switch from releasing industrial land to retaining most of the remaining land. Whether such a shift is appropriate will depend upon the strategic value placed upon these activities. Care is needed at a local level to be clear on what industry is being protected and to ensure that policies are sufficiently robust and unambiguous, and then are protected with vigour, to reduce the potential for blight, hope values and issues over bad neighbour activities with other sensitive land uses damaging industrial activities and viability.
London Industrial Intensification Primer (2017)	Summarises the main forms intensification can take, with case study examples. While some of the options presented are fairly straight forward, and some are possible with greater attention to detail, others will be more challenging, in terms of economic viability and deliverability, as well as ensuring the quality of industrial and residential space. In many cases intensification will have to be considered at the masterplan level as well as the level of individual developments. The document also suggests some typical basic specifications for large and small industrial units to ensure that any intensified or mixed space is suitable for industrial occupiers.
LLDC Employment Space Study (2015)	Providing a framework and examples of how employment provision can be designed.

P10. Scrubs Lane

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Scrubs Lane Vision	Scrubs Lane is an important road connecting Harlesden, Old Oak, and White City which is well used and will continue to be well used. It also provides access to the A40. There is an opportunity to improve the physical environment of this street through robust building, traffic management, new access routes to Old Oak and existing amenity spaces, and the provision of quality public realm for pedestrians and cyclists. Along Scrubs Lane there may be opportunities for early development so long as these developments complement the aspirations of the wider masterplan and support the comprehensive regeneration of the area whilst also achieving suitably high design standards. To the north of the Grand Union Canal this should include new and improved connections from Scrubs Lane into Old Oak North, a significantly improved public realm, access to the canal, and there may also be opportunities to provide new access into the Cemetery.

	To the south of the Grand Union Canal this should include new and improved access to North Pole Depot East that would enable improved connections on to Kensal Canal side Opportunity Area. There should also be opportunities to improve pedestrian and cycle access to both Wormwood Scrubs and Little Wormwood Scrubs which would provide better opportunities for local people to access these important amenity and ecological spaces. Kensal Cemetery and the Grand Union Canal Conservation Areas sit to the east and south of Scrubs Lane. New development will need to be sensitive to these existing heritage assets. To create an attractive place the environment of Scrubs Lane will need to be significantly enhanced, through new high quality development and public realm improvements. These should also create a generous walking and cycle environment along its entire length. Uses in this area will be residential-led with opportunities for a mix of uses at lower levels. At ground level buildings will need to be predominantly either active, or have a mixture of residential entrances with front doors on street. The scale and massing of development along Scrubs Lane will need to be coordinated with that of nearby Opportunity Areas, specifically along the Grand Union Canal to the Kensal Opportunity Area
Scrubs Lane Key Objectives	1. Early regeneration along Scrubs Lane will be encouraged where it complements the aspirations of this planning framework and OPDC's energy policy plans. It will be important that early development achieves the highest quality design and architectural standards to set the right tone for the wider area 2. To the north of the Grand Union Canal new and improved access points should be provided into Old Oak North from Scrubs Lane; 3. To the south of the Grand Union Canal new and improved access to North Pole Depot East should be provided, along with opportunities for pedestrian and cycle access to Wormwood Scrubs and Little Wormwood Scrubs 4. Transport improvements are likely to be required along Scrubs Lane; 5. Public realm improvements including wider footways and high quality cycle infrastructure will be needed linking Scrubs Lane to Wood Lane and further south to White City; 6. Environmental and street greening will be required, including the potential for Sustainable Urban Drainage Systems (SUDS); 7. New development should create a coherent built form onto the street: *ƒ* Scrubs Lane should be a transition area between the surrounding area and the core development area; *ƒ* Along the eastern side of the street, development should sensitively respond to adjacent buildings (including the Former Cumberland Park Factory) and to St. Mary's Cemetery; *ƒ* Along the western side (behind the street front) there will be opportunities for increased massing and taller elements that respond

	to the scale of new development within the core development area. 8. New development to the south of Scrubs Lane will need to respect the existing Grand Union Canal conservation area; 9. There is also an opportunity to investigate the potential for a safe and secure access to the Cemetery; and 10. Development should be predominantly residential led with opportunities for other uses on the lower levels. New development should include a mix of active commercial uses and residential front doors on street. Where early development is proposed, lower level uses will need to be flexible to respond to a changing environment.

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Residential led development supported	104-106 Scrubs Lane & 108 Scrubs Lane	Noted.
Higher density development west of Scrubs lane supported	104-106 Scrubs Lane & 108 Scrubs Lane	Noted.
Comprehensive will support wider OPDC aspirations for coordinated development	104-106 Scrubs Lane & 108 Scrubs Lane	Noted.
Broad support for vision and policy. Some amendments provided.	Aurora Developments Ltd, Ballymore Group, Historic England, Midland Terrace Residents Group, Old Oak Interim Forum, Old Oak Park	Noted.
North Kensington Gate is suitable for a tall building	Aurora Developments Ltd	Noted.
Tall buildings that contribute to place making and provide much needed housing should be considered in addition to heritage considerations	Aurora Developments Ltd	Noted.
Development capacity - state as minimums	Aurora Developments Ltd	Change proposed. Policy P10 sets out minimum indicative targets for new homes and jobs.
UK Tyres Exporters site suitable for redevelopment	Boropex Holdings Limited	Noted. Mitre Wharf is identified as a potential development site in the Development Capacity Study (2017) and in policy P10.
The ‘sensitive edge’ notation is unclear.	Diocese of London	Change proposed. Policy SP9 identifies and depicts sensitive locations. This

		includes existing residential areas, open spaces and heritage assets.
Access to Scrubs Lane from Wormwood Scrubs is adequate	Friends of Wormwood Scrubs	No change proposed.
Support for improvement of the fencing and general maintenance of the Scrubs Lane margin. Charitable Trust should lead this.	Friends of Wormwood Scrubs	No change proposed. To accord with the Wormwood Scrubs Act, policy P10 seeks to improve access to the Scrubs for all Londoners through new and improved sensitive walking and cycling routes from surrounding areas.
Utilise TfL indicative costings for width increase to Mitre Bridge.	GLA, TfL	Noted. This information will be used to inform the Scrubs Lane Supplementary Planning Document.
Concern evidence base does not sufficient consider impact of tall buildings on heritage assets.	Historic England, local community representative	Change proposed. The Scrubs Lane Development Framework Principles sets out an updated evidence base for building heights along Scrubs Lane include a Strategic Views Assessment considering the impact on heritage assets.
Consider greater flexibility in housing and jobs targets to manage impact on character of Scrubs Lane	Historic England	No change proposed. Development capacity is based on the analysis set out in the Development Capacity Study (2017) and the Scrubs Lane Development Framework Principles (2017). This provides indicative information suitable for inclusion in the Local Plan as a strategic planning document.
Policy should refer to 'preserve or enhance' rather than 'conserve and/or enhance'.	LB Hammersmith and Fulham	No change proposed. To ensure consistency with the NPPF, the term conserve and enhance is utilised.
Settings of listed buildings within St Mary's Cemetery and Kensal Green Cemetery should also be 'preserved or enhanced'. Setting of Historic Park and Garden at Kensal Green Cemetery should also be 'preserved or enhanced'.	LB Hammersmith and Fulham	Change proposed. Policy D8 refers to conserving and enhancing settings of heritage assets.
Refer to large scale advertisements hoardings	LB Hammersmith and Fulham	No change proposed. OPDC considers that policy D2

that line the frontages of many sites on Scrubs Lane detracting from the appearance of the street scene. The removal of advertisement hoardings causing substantial injury to visual amenity should be an objective.		provides sufficient guidance for ensuring advertisements have a neutral or positive contribution to amenity and public safety.
Policy should be clear that the entire corridor would need to be considered and not just the OPDC portion	LB Hammersmith and Fulham	No change proposed. The Local Plan cannot set policy outside of the OPDC area. The supporting text of policy P10 identifies the need to work with relevant stakeholders outside of the OPDC area.
Proposed taller elements are not compatible with the 'vision' of Scrubs Lane.	Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA	Change proposed. The Scrubs Lane Development Framework Principles sets out an updated evidence base for building heights along Scrubs Lane. This includes a range of heights include four tall buildings located at new and improved east-west routes into Old Oak to support local legibility.
Suggest a small 'creative hub'. Specific live/work policies could be developed, applying to a set of permanent moorings as well as to studio workspace.	Midland Terrace Resident's Group, Old Oak Interim Forum	Change proposed. This is now covered at the cluster for Atlas Junction (P8C1). Work-live is dealt with through Policy E4.
Concerns regarding business displacement and services	Old Oak Interim Forum, Scrubs Lanes businesses, local community representative	Change proposed. P10C4 provide guidance for the delivery of clusters of activity at these locations.
Concerns regarding deliverability of a continuous cycle route. Suggest delivery of route along eastern edge of Wormwood Scrubs and then into Old Oak North.	Old Oak Interim Forum	No change proposed. Policy P10 sets out the proposal for a continuous segregated cycle lane and improved foot path along the west of Scrubs Lane. The Scrubs Lane Supplementary Planning Document will provide further detail in relation to delivering these improvements along the eastern edge of Wormwood Scrubs. This will be carried out in accordance with policies EU1, EU2 and P12.
Query regarding	Old Oak Interim Forum	Change proposed. Mitre

development potential of Mitre Industrial Estate and request relocation to Scrubs Lane place.		Industrial Estate is now included within the place of Scrubs Lane. This is reflected in policy P10. The Scrubs Lane Development Framework Principles sets out potential long-term development aspirations for the Mitre Industrial Estate. Any proposals will need to accord with policy E1 regarding existing employment floorspace.
Location of B1 uses guidance is too prescriptive and should reflect potential for workspaces at lower floors of buildings. Remove reference to 'B1 (b) and B1 (c) within the preferred policy option for Land Use. Refer to only B1 uses.	Old Oak Park	Change proposed. Policy P10 requires employment floorspace to be provided along the ground and lower floors of development fronting on to Scrubs Lane. This includes small business space, B1a, B1c, B2 and B8 uses.
Vehicular routes into Old Oak North - further detail on requirements needed. Two new vehicular routes are not required.	Old Oak Park	Change proposed. Policy P10 sets out the provision of four new and improved walking and cycling routes and one all modes route into Old Oak North.
Figure 49 - define as illustrative	Old Oak Park	Change proposed. The Local Plan appendix identifies that maps in the document are indicative.
Support for mid and high density guidance. Define Scrubs Lane as location for early delivery, including Willesden Junction.	QPR (NQP Development Services), Westkite Limited	Noted.
Query lowering of density figures from OAPF to Local Plan in Scrubs Lane	QPR (NQP Development Services)	Noted. Development capacity has been updated and is based on the analysis set out in the Development Capacity Study (2017) and the Scrubs Lane Development Framework (2017).
Support new connections to Old Oak. Highlight importance of connections to Willesden Junction and Hythe Road	QPR (NQP Development Services)	Noted.
Recognise the important contribution of small businesses along Scrubs	Scrubs Lane businesses	Change proposed. Policy P10 provides guidance for the provision of small

Lane		business floorspace in accordance with policy E3.
Maintenance is poor at Cumberland business Park.	Scrubs Lane businesses	Noted.
Support for cycle way	TITRA	Noted. Policy P10 requires development to contribute to the delivery of a segregated cycle way along the west of Scrubs Lane.
A higher density mixed use development could be located in the Cumberland Park business area including retail uses.	Westkite Limited	Noted. Policy P10 identifies the site for potential development including lower heights fronting the street and potential for tall heights adjacent to the railway. Retail floorspace on Scrubs Lane is focused at the four clusters. This site is located outside of a cluster. As such ground floor employment floorspace is supported.
2,600 dwellings should be shown as a minimum	Westkite Limited	Change proposed. Policy P10 sets out minimum indicative targets for new homes and jobs.
Support for segregated cycle lane	Local resident	Noted. Policy P10 requires development to contribute to the delivery of a segregated cycle way along the west of Scrubs Lane.
Use former railway track for access to Mitre Industrial Estate	Local resident	Noted. This information will be used to inform the Scrubs Lane Supplementary Planning Document.
Support new entrance into Wormwood Scrubs from the north linking to a central north/south spine, green spaces and canal crossing through Old Oak. Wormwood scrubs must retain wild character and must not be counted towards green space provision for new homes.	Local resident	Noted. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area as publicly accessible open space. This excludes Wormwood Scrubs and Kensal Green Cemetery.
Support two new connections into Old Oak and walking and cycling routes.	Local resident	Change proposed. Policy P10 sets out the provision of four new and improved walking and cycling routes and one all modes route into Old Oak North.
Support Conservation Area designation	Local residents	Noted. The Cumberland Park Factory Conservation Area was designated on 27

		February 2017.
Willesden Junction to be a new place	Local resident	Change proposed. Policy P11 now provides specific place guidance for Willesden Junction.
Conservation area restrictions on properties	Local community representative	Noted.
Conservation area extension from St. Marys Conservation Area	Local community representative	Noted. This information will be used to inform future heritage workstreams outside of the scope of the Local Plan.
Mitre Bridge Industrial estate development plans information request and concerns of impacts of development on Little Wormwood Scrubs and St. Marys Cemetery	Local community representatives	Noted. The Scrubs Lane Development Framework Principles provides guidance for development to the north and west of Little Wormwood Scrubs and area adjacent to St. Mary's Cemetery. This is reflected in policy P10.
Northern end of Scrubs Lane should not be high density	Local community representative	Noted. Policy P10 identifies that the northern area of Scrubs Lane is appropriate for a range of densities, including high densities reflecting its proximity to the proposed Old Oak High Street and public transport access.
Strengthen links to Harlesden High Street	LB Brent, Local residents	Change proposed. Policy P10C1 provides guidance for improving the public realm to support access to Harlesden town centre.
Conservation Areas provide stronger management powers than Locally Listed Buildings	LB Brent	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.
Support for low density	Local community representative	Noted. Place policies no longer provide specific density guidance. Policy SP9 provides broad guidance for delivering high densities in area of high levels of public transport access. Policy P10 and cluster policies provide guidance for building heights to respond to sensitive locations and support local legibility.
Support for light industrial uses	Local resident	Noted. Policy P10 continues to support a range of B1 floorspace including B1c light industrial.

Cumberland Park Factory warehousing is well maintained	Local community representative	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.
Northern end of Scrubs Lane is suitable for early development	Local resident, student	Noted. This information is reflected in OPDC's Development Capacity Study (2017)
Willesden Junction Station should be decked to help connections to Harlesden	LB Brent	Noted. Policy P11 supports optimising development on and/or adjacent to the station and tracks.
OPDC should engage with communities along Scrubs Lane	Local community representative	Noted. OPDC has carried out two workshops with local residents and businesses to inform the Scrubs Lane Development Framework Principles.
Clarity regarding form of connections to Old Oak needed	Local resident, local business	Change proposed. Policy P10 sets out the provision of four new and improved walking and cycling routes and one all modes route into Old Oak North.
Concern regarding need to designation Cumberland Park Factory Conservation Area.	Local resident	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.
Cumberland Park Factory could be reused for creative industries	Local resident	Noted.
Define smaller scale neighbourhoods in Scrubs Lane	Local resident	Change proposed. Policies P10C1 to P10C4 provide guidance for smaller clusters along Scrubs Lane.
Retail and leisure uses should be delivered	Local resident	Noted. Policy P10 directs retail and leisure uses to clusters along Scrubs Lane.
Support for housing and jobs targets	Local resident	Noted.
Support for density guidance	Hammersmith and Fulham Historic Buildings Group	Noted.
Some buildings could/should remain. Providing access to Little Wormwood Scrubs should be considered.	Hammersmith and Fulham Historic Buildings Group	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017. This is reflected in policy P10. P10 also seeks to deliver to walking and cycling access to Little Wormwood Scrubs.
Welcome proposals for a Scrubs Lane masterplan	Midland Terrace Residents Association	Noted. The Scrubs Lane Development Framework Principles fulfils this purpose.

The Local Plan should also emphasise that such mixed-use development will also be encouraged at Scrubs Lane to provide a gateway to the new neighbourhood.	Westkite Ltd	Noted. Policy P10 provides guidance for the location of land uses along Scrubs Lane. This includes non-residential development at ground and lower floors facing on to Scrubs Lane with residential above. Within clusters non-residential uses are envisaged to be a mix of employment, leisure, retail and community uses. Outside of clusters, non-residential uses are envisaged to be employment uses.
There are inconsistencies on the document for the boundary of the Scrubs Lane place, which is shown differently in Figures 49 and 23	Hammersmith and Fulham Historic Buildings Group	Noted. Policy P10 provides a definitive amended boundary for the Scrubs Lane place.
Support Policy P8	Ballymore Group	Noted. Policy P10 now provides guidance for Scrubs Lane.
Should protect the old warehouse buildings on Scrubs Lane	Resident	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.
Should protect Westmoreland House as a heritage asset	Resident	No change proposed. OPDC's Heritage Strategy has undertaken a detailed analysis of existing and potential heritage assets within the OPDC area. Westmoreland House was not identified as a potential heritage asset.
Support designation of Cumberland Park Factory Conservation Area	Hammersmith and Fulham Historic Buildings Group	Noted. The Cumberland Park Factory Conservation Area was designated on 27 February 2017.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
An extra 350m of active frontage at Harrow Road/Scrubs Lane could result in over 5,000sqm of town centre floorspace, which could impact	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	Change proposed - the requirement for a Harlesden Enhancement Strategy has been amended so that it applies to all places. It is now covered in Policy TCC1.

significantly on Harlesden Town Centre	Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	
OPDC should use the Old Oak Masterplan process to deliver a suitable contextual response; a consideration of potential less damaging alternatives; measures to minimise or mitigate potential harm, and; shape a coherent building heights strategy along Scrubs Lane.	Historic England	Noted. OPDC considers that the Scrubs Lane Development Framework Principles provides appropriate guidance, including a coherent building heights strategy, that is informed by the local context and considers the impact on the significance of heritage assets within and around the OPDC area.
It isn't clear if suggested cycle and pedestrian routes along Scrubs Lane are existing or proposed. If proposed, then such improvements would be difficult to deliver without encroaching on the Scrubs which is highly objectionable. Current entrance points to Wormwood Scrubs from Scrubs Lane are appropriate and no additional access points are required.	The Friends of Wormwood Scrubs, Hammersmith Society, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. OPDC has amended the policy to provide flexibility in its implementation.
Further recognition is required for flexibility in planning policy when seeking to bring forward early development including when seeking to deliver housing above the ground floor.	Remavon	No change proposed. OPDC considers Policy P10 and other Local Plan policies to be sufficiently flexible to support early development.
Flexibility is required for policies seeking sites to deliver new/improved pedestrian and cycle routes so that they do not unduly impact on the development potential of specific sites.	Boropex Holdings Limited	No change proposed. The location and form of walking and cycling routes set out in P10 is justified by the Scrubs Lane Development Framework Principles and informed by transport supporting studies. OPDC considers that the level of detail provided within P10 is appropriate to the role of a Local Plan to guide development proposals.
Support P10(g)	Boropex Holdings Limited	Noted.
Support P10(i)	Boropex Holdings Limited	Noted.

Policy restricting one tall building in each cluster on Scrubs Lane is too restrictive, does not accord with London Plan policy 7.7 and has already been contravened by recently permitted schemes.	Boropex Holdings Limited	No change proposed. The approach to tall buildings along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. This approach accords with London Plan policy 7.7(A) by ensuring the guidance for tall buildings is part of a plan-led approach to developing Scrubs Lane by identifying appropriate, sensitive and inappropriate locations for tall buildings. Currently permitted schemes accord with the guidance set out in P10.
Figure 4.49 is overly prescriptive, in particular the requirements illustrated for public open space and public access routes. It should be revised to show a reduced amount of public open space, and a statement should be inserted clarifying that the diagram is indicative only.	Boropex Holdings Limited	No change proposed. The London Plan Appendix states that all figures in the Local Plan should be treated as indicative. The introduction to the Places Chapter confirms that place policy figures are diagrams. Figure 4.49 and the indicative amount of publicly accessible open space is based on recommendations set out in the Scrubs Lane Development Framework Principles. As such OPDC considers the indicative amount of publicly accessible open space depicted in figure 4.49 is appropriately justified and appropriate for the role of a Local Plan.
Policy should be reworded so as not to specifically mention / show the public space at junction of 115-129 Scrubs Lane and remove green arrow through this space.	Boropex Holdings Limited	Change proposed. To provide clarity regarding the role of the space between 115-129 Scrubs Lane and Mitre Wharf, the diagram supporting Policy P10C4 will be amended to remove the public open space in this location. No change proposed. The

		locations of the green arrows depicting pedestrian/cycling routes are based on recommendations set out in the Scrubs Lane Development Framework Principles to support connectivity to the publicly accessible open space.
It may not be appropriate for the easterly block on Mitre Wharf site to include active uses.	Boropex Holdings Limited	Change proposed. To reflect the quieter character of this area, positive frontages have been shown in figure supporting Policy P10C4.
The identification for a 3.5m route for walking and cycling either side of the canal within the Grand Union Canal Massing and Enclosure Note is overly generous for the Mitre Wharf site, and should be integrated with open space provision.	Boropex Holdings Limited	No change proposed. The Grand Union Canal Massing and Enclosure Note sets out indicative cross sections, assuming 3.5 metres on either side of the Grand Union Canal across its length. This is used to inform appropriate height to width ratio to define general heights for development facing on to the canal. It does not set out guidance requiring 3.5 metre wide walking/cycling along the northern edge of the canal. Guidance for delivering this route is provided in Policy P3 which does not define an envisaged width.
Support P10C4(d)(e)	Boropex Holdings Limited	Noted.
As currently worded, policy suggests views through the mitre wharf site to/from the Cemetery and Mitre Bridge should be protected. While the setting of these assets should be respected, the connecting view does not merit a need respected and policies suggesting that they should should be deleted. Evidence has been provided setting out rationale for removing parts (e)(ii) and (iii).	Boropex Holdings Limited	Change proposed. To ensure correct referencing, Policy P10C4 has been amended to make reference to Scrubs Lane overbridge. Change proposed. Policy P10C4 has been amended to remove references to views between heritage assets.
Support intention to provide improved cycle facilities and bus corridor reliability.	Transport for London (Group Planning)	Noted.
Policy wording should be clearer regarding delivering	Transport for London (Group Planning)	No change proposed. Policy SP9 sets out phasing of

development after the plan period and that any proposals for future development of the North Pole Depot will need to take account of future operational needs.		development reflecting the North Pole East Depot being delivered after the plan period.
Support vision for early delivery at Scrubs Lane.	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
Support for 1,100 new jobs and a minimum of 2,000 new homes during the plan period including early development	Fruition Properties	Noted.
Support for small business employment uses fronting Scrubs Lane	Fruition Properties	Noted.
Retail uses could also be appropriate along the length of Scrubs Lane	Fruition Properties	No change proposed. To support the vitality of Scrubs Lane, delivery of employment floorspace and ensure retail units benefit from sufficient footfall, retail uses are focused within clusters at new and improved east-west routes.
Support residential uses on upper floors of Scrubs Lane	Fruition Properties	Noted.
There should be flexibility on building heights	Fruition Properties	No change proposed. The approach to building heights along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations.
Part (f) and paragraph SL.6 should make reference to Kensal Canalside Opportunity Area.	Royal Borough of Kensington and Chelsea	Change proposed. Amendments have been made to the policy.
Evidence base for tall buildings along Scrubs Lane is not sufficient should give more consideration to the impact of tall buildings along Scrubs Lane on the St Mary's and Kensal Green Cemeteries.	Royal Borough of Kensington and Chelsea, Old Oak Interim Neighbourhood Forum, Historic England, Hammersmith and Fulham Historic Buildings Group, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. The approach to building heights along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport

	Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	access and sensitive locations. A Strategic Views Assessment on the impact on relevant heritage assets was carried out to inform the Framework Principles recommendations. This approach accords with London Plan policy 7.7(A) and Draft New London Plan policy D8 in defining locations of tall buildings.
Scrubs Lane is currently unpleasent and has poor amenity.	A Somefun	Noted. Policy P10 provides place specific policies to address these issues.
Policy is unsound	Sarah Abrahart	No change proposed. OPDC considers the policy is sound.
More buses are needed along Scrubs Lane	ArtWest	Noted. Policy T6 requires proposals to facilitate, deliver and contribute to bus infrastructure.
Support policy.	ArtWest	Noted.
Guidance for a tall building in each clusters needs further detail.	ArtWest	No change proposed. The approach to building heights along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. A Strategic Views Assessment on the impact on relevant heritage assets was carried out to inform the Framework Principles recommendations. This approach accords with London Plan policy 7.7(A) and Draft New London Plan policy D8 in defining locations of tall buildings.
Plan to develop south of the Grand Union Canal on the Mitre Industrial Estate is illogical and is not positively prepared or justified.	St Quintin and Woodlands Neighbourhood Forum, Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. Proposals for redevelopment of the Mitre Industrial Estate is based on evidence base set out in the Scrubs Lane Development Framework Principles. Development capacity information for these sites was subsequently used to inform the Development

	Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Capacity Study in accordance with National Planning Practice Guidance for Housing and Economic Land Availability Assessments. This considers the improvements in public transport provided by Old Oak Common Station, Scrubs Lane bus services and proximity to the development of Kensal Canalside, including the potential Elizabeth Line Station. Development capacity also considers the adjacent sensitive locations of Little Wormwood Scrubs, Wormwood Scrubs and residential areas.
Without a commitment about the delivery of the Hythe Road station, the densities in Scrubs Lane are unjustified and ineffective	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Should Hythe Road Station not be delivered, high density development would be appropriate based on public transport accessiblity improvements offered by Old Oak Common Station, improvements to Willesden Junction Station and bus services along Scrubs Lane. Relevant policies support enhancements to public transport accessibility levels.
Support designation of Cumberland Park Factory Conservation Area	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Planning permissions along Scrubs Lane have been permitted based on the emerging policy of the Scrubs Lane Development Framework Principles Document and emerging Regulation 19 Local Plan. Draft Regulation 18 Local Plan policies have been	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy	Noted. Permissions have been determined following a plan led approach considering relevant national guidance, London Plan policies, Local Plan policies and other material considerations on a case by case basis.

disregarded. Objections to permissions refer to these decisions being premature. Permissions do not deliver the Regulation 18 vision to deliver a sensitive edge and "a pleasant street, respectful of surrounding heritage assets, with a high quality public realm".	Aspinall, Thomas Dyton	
Sub paragraphs of P10 are too detailed for a Local Plan. This reflect land ownerships of developers and does not provide a plan-led approach. Clusters are not justified due to lack of evidence of their locations being more active or distinctive thatn other locations.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
LBHF as Highways Authority has submitted strong objections to the series of planning applications for developments in Scrubs Lane, on the grounds that	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and	No change proposed. Permissions along Scrubs Lane accord with Policy P10 by providing sufficent space to enable the future delivery of high quality cycle lanes

these are premature until a comprehensive new road layout is delivered.	Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	and a generous footpath. This is recommended by the Scrubs Lane Development Framework Principles document. Detailed design schemes for the cycle land and footpath will be undertaken at the appropriate time reflecting delivery of development along Scrubs Lane.
Policy P10f)ii) is not considered to be deliverable and is too detailed for a Local Plan and should be removed and left for a SPD, Area Action Plan or neighbourhood plan	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
Policy for the clusters is too detailed and would be more appropriate in a site planning brief or neighbourhood plan.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas	No change proposed. Para 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area.

	Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	NPPG on Neighbourhood Plans sets out further guidance on the general conformity of Neighbourhood Plans with strategic policies. Para 076 sets out considerations for whether a policy is a strategic policy. One of these considerations is whether the Local Plan identifies the policy is strategic. It is therefore clear that Local Plans are supposed to set out which policies it considers to be strategic. In relation to the place policies, OPDC does consider these to be strategic. They set out the overarching direction and objectives for each place, they deal with strategic matters such as how many homes and jobs must be delivered in each place, they include site allocations which are important to delivering the spatial vision and homes and jobs targets, and they set out the important infrastructure required to support the sustainable regeneration of that place and of the wider plan.
Object to the proposal for a separate segregated cycleway over the Grand Union Canal and consider that the proposal for it is not clear in the Local Plan	Regents Network	No change proposed. A continuous segregated cycle lane along the full length of Scrubs Lane is required to support local permeability. Additional guidance will be provided withing the future Old Oak Norht and Scrubs Lane Supplementary Planning Document in due course.
Support for Pillbox precedent but it is not very descriptive	Regents Network	Noted.
All parks and green spaces in Kings Cross are linear as there is little space that is 'open'.	Regents Network	Noted.
Local Plan should allow flexibility for taller buildings outside of cluster locations,	Remavon	No change proposed. The approach to tall buildings along Scrubs Lane is

in particular gateway locations such as 151 Scrubs Lane.		supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. Building heights will also be informed by national guidance, London Plan policies and Local Plan policies including SP9 and D5. This accords with the requirements of Draft New London Plan policy D8 to define locations of tall buildings.

Regulation 19(2) consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Requirement for footpath width in Policy P10 is greater than those identified in pre application discussions.	Old Oak Park Limited	No change proposed. The proposed width of the footpath is recommended by the Scrubs Lane Development Framework Principles to support walking, green infrastructure and spill out space for adjacent land uses.
Lack of evidence for increased development capacity.	The Hammersmith Society	No change proposed. Development capacity is defined in OPDC's Development Capacity Study. This has been developed in accordance with the National Planning Practice Guidance on Housing and Economic Land Availability Assessments to demonstrate how the London plan targets can be delivered. The Development Capacity Study includes development capacity information set out in the Old Oak North Development Framework Principles, Scrubs Lane Development Framework and includes updated development

		management information. This information has led to an increased in development capacity within the Place of Scrubs Lane in relation to the release of an additional development site for development which previously was required for a new access route into Old Oak North.
Evidence base for tall buildings along Scrubs Lane is not sufficient and should give more consideration to the impact of tall buildings along Scrubs Lane on the St Mary's and Kensal Green Cemeteries. Policy is too prescriptive. Guidance for visual permeability should be reinstated. Policy retrofits approved decisions. Scrubs Lane Direction of Travel document was not consulted on as part of the Local Plan consultation.	Royal Borough of Kensington and Chelsea, Historic England, Grand Union Alliance	No change proposed. The approach to tall buildings, and level of detail of policies, along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. This approach accords with current London Plan and Draft New London Plan by ensuring the guidance for tall buildings is part of a plan-led approach to developing Scrubs Lane by identifying appropriate, sensitive and inappropriate locations for tall buildings. A Strategic Views Assessment on the impact on relevant heritage assets was carried out to inform the Scrubs Lane Development Framework Principles. The assessment considered the impact on locations outside of the OPDC area including Kensal Green Cemetery. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations. Change proposed. To provide clarity for the need for visual permeability, text

		from the first Regulation 19 Revised Draft Local Plan will be reinstated. This will complement Local Plan Policy D4 and Draft New London Plan policy D8. No change proposed. Permissions have been determined following a plan led approach considering relevant national guidance, London Plan policies, Local Plan policies and other material considerations on a case by case basis. No change proposed. The Scrubs Lane Development Framework Principles document supersedes the Scrubs Lane Direction of Travel document. This is a supporting study to the Local Plan and was subject to the first and second Regulation 19 consultations.
Further information defining a cluster of uses should be provided.	Historic England	No change proposed. The Scrubs Lane Development Framework Principles (Principle 4) sets out the approach to clustering uses. These are defined for each cluster and reflected in Policies P10, P10C1, P10C2, P10C3 and P10C4.
Supporting text paragraph regarding Cumberland Park Factory Conservation Area is welcomed. Guidance for the conservation should be included in the policy.	Historic England	No change proposed. The National Planning Practice Guidance states that Local Plans should avoid undue repetition. Guidance for designated heritage assets is provided in policy D8.
Support for delivering improved cycling facilities along Scrubs Lane that will support bus services.	Transport for London	Noted.
If widened footpath requires loss of publicly accessible open space or vegetation further detailed work will be required. Figure 4.34 should be clear where footpath improvements will be	Wormwood Scrubs Charitable Trust	Noted. P12 identifies that any proposals affecting Wormwood Scrubs will need to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith

located. No new access onto the Scrubs should be shown.		and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land. No change proposed. Local Plan Appendix identifies that figures in the Local Plan are indicative. The Scrubs Lane Development Framework Principles document provides further detail for the footpath. No change proposed. Sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations.
Support for early delivery of development along Scrubs Lane	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
Policy should reinstate SuDs guidance.	London Borough of Hammersmith and Fulham	No change proposed. Policy EU3 provides guidance for SuDS
Employment heritage is not sufficiently recognised. Affordable workspace is not adequately specified.	Grand Union Alliance	No change proposed. Scrubs Lane's employment heritage is referenced in P10 Vision, Policy P10 and supporting text. Specific references relate to the continued delivery of employment floorspace, typology of development and designation of the Cumberland Park Factory Conservation Area. Guidance for affordable workspace is provided in policy E3.
Transport infrastructure for new east west connections between Scrubs Lane and Old Oak North will create barriers for local communities.	Grand Union Alliance	No change proposed. Policies SP7, P2, P10, D2 and T1 provide guidance to deliver a high quality movement within Old Oak North and Scrubs Lane that

Potential Hythe Road Overground Station is uncertain. A new Overground Station at White City Roundabout would improve PTAL.		connects surrounding communities. This is delivered at a level appropriate to the role of a Local Plan. Detailed design of connections will need to accord with this guidance. Noted. TfL supports the preferred option of a viaduct and potential new station at Hythe Road. The benefits of this solution have been demonstrated through TfL's business case work and the public consultation carried out in autumn 2017 showed significant public support for the proposals. The Overground station at Old Hythe Road is planned to be delivered by 2026 to coincide with the opening of Old Oak Common station. OPDC is currently working with partners including HS2, Network Rail and TfL to confirm a funding package for the station. Noted.
Planning application response to Local Plan policies are premature and do not meet the Mayor's ambition for 50% affordable housing.	Grand Union Alliance	No change proposed. Permissions have been determined following a plan led approach considering relevant national guidance, London Plan policies, Local Plan policies and other material considerations on a case by case basis.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Scrubs Lane Development Framework Principles	• Deliver mixed-use development across the area to support the local economy and deliver housing. This should generally comprise employment floorspace on ground floors fronting onto Scrubs Lane and railways with housing above. • Focusing active retail, social infrastructure, community and leisure uses in clusters around each of the four new and improved east-west routes into Old Oak North. • Support north-south movement along the street through

	improvements to walking and cycling routes and the carriageway. • Deliver new and improved east to west routes to Old Oak North and potentially St. Mary's Cemetery • Deliver a well-defined street with generous footpaths, a segregated cycle lane on the western side and positive and active frontages along its length • Deliver multifunctional green infrastructure comprising of new publicly accessible open spaces in each cluster and street greening along the length of Scrubs Lane. • Conserve and enhance the local character, specifically St. Mary's Cemetery, Cumberland Park Factory and the Grand Union Canal conservation areas as well as Kensal Green Cemetery Grade 1 Listed Registered Park/Garden. • Deliver a high quality built environment that responds to the surrounding sensitive locations and supports local legibility by delivering a range of building heights to provide: o north of the Grand Union Canal, generally 6-8 storey heights onto Scrubs Lane; o south of the Grand Union Canal, generally 8-10 storey heights onto Scrubs Lane with lower heights adjacent to Little Wormwood Scrubs; o generally lower heights opposite the Cumberland Park Factory; o generally 6 to 8 storey heights fronting onto the Grand Union Canal; o increased heights of 8-10 storeys adjacent to the railway; o a single tall building in each cluster; and o visual permeability between taller buildings. •
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 2,600 new homes within Scrubs Lane. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 1,200 new jobs within Scrubs Lane. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities.

	Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Old Oak North Development Framework Principles	• Delivery and phasing of development to reflect updated location of key routes of Park Road and Old Oak Street. • Provide connections to Scrubs Lane that should be located at Park Road and Hythe Road. • Delivery of a two-way cycle lane to the west of Scrubs Lane is no longer likely to be deliverable. • Within the place of Willesden Junction, Old Oak Street will continue as a walking and cycling route connecting to Station Approach in the west. To the east a new walking and cycling link will also be delivered to Harrow Road.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal. This includes four key routes in Old Oak. These	This recommendation has been superseded by the key route network recommended by the Old Oak North Development Framework Principles.

	are: Old Oak High Street, Grand Union Street, Park Road and Wormwood Scrubs Street.	
Scrubs Lane Development Framework Principles	Deliver a segregated cycle lane on the western side and positive and active frontages along its length	This recommendation has been superseded by the Old Oak North Development Framework Principles which recommends a flexible approach is taken to delivering segregated cycles lanes potentially on either side of the street. The width requirement for the street is consistent with that defined in the Scrubs Lane Development Framework Principles.

Other evidence base

Supporting Study	Recommendations
	• None

P10C1. Harrow Road

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Scrubs Lane Vision	Scrubs Lane is an important road connecting Harlesden, Old Oak, and White City which is well used and will continue to be well used. It also provides access to the A40. There is an opportunity to improve the physical environment of this street through robust building, traffic management, new access routes to Old Oak and existing amenity spaces, and the provision of quality public realm for pedestrians and cyclists. Along Scrubs Lane there may be opportunities for early development so long as these developments complement the aspirations of the wider masterplan and support the comprehensive regeneration of the area whilst also achieving suitably high design standards. To the north of the Grand Union Canal this should include new and improved connections from Scrubs Lane into Old Oak North, a significantly improved public realm, access to the canal, and there may also be opportunities to provide new access into the Cemetery. To the south of the Grand Union Canal this should include new and improved

	access to North Pole Depot East that would enable improved connections on to Kensal Canal side Opportunity Area. There should also be opportunities to improve pedestrian and cycle access to both Wormwood Scrubs and Little Wormwood Scrubs which would provide better opportunities for local people to access these important amenity and ecological spaces. Kensal Cemetery and the Grand Union Canal Conservation Areas sit to the east and south of Scrubs Lane. New development will need to be sensitive to these existing heritage assets. To create an attractive place the environment of Scrubs Lane will need to be significantly enhanced, through new high quality development and public realm improvements. These should also create a generous walking and cycle environment along its entire length. Uses in this area will be residential-led with opportunities for a mix of uses at lower levels. At ground level buildings will need to be predominantly either active, or have a mixture of residential entrances with front doors on street. The scale and massing of development along Scrubs Lane will need to be coordinated with that of nearby Opportunity Areas, specifically along the Grand Union Canal to the Kensal Opportunity Area
Scrubs Lane Key Objectives	1. Early regeneration along Scrubs Lane will be encouraged where it complements the aspirations of this planning framework and OPDC's energy policy plans. It will be important that early development achieves the highest quality design and architectural standards to set the right tone for the wider area 2. To the north of the Grand Union Canal new and improved access points should be provided into Old Oak North from Scrubs Lane; 3. To the south of the Grand Union Canal new and improved access to North Pole Depot East should be provided, along with opportunities for pedestrian and cycle access to Wormwood Scrubs and Little Wormwood Scrubs 4. Transport improvements are likely to be required along Scrubs Lane; 5. Public realm improvements including wider footways and high quality cycle infrastructure will be needed linking Scrubs Lane to Wood Lane and further south to White City; 6. Environmental and street greening will be required, including the potential for Sustainable Urban Drainage Systems (SUDS); 7. New development should create a coherent built form onto the street: ƒ Scrubs Lane should be a transition area between the surrounding area and the core development area; ƒ Along the eastern side of the street, development should sensitively respond to adjacent buildings (including the Former Cumberland Park Factory) and to St. Mary's Cemetery; ƒ Along the western side (behind the street front) there will be opportunities for increased massing and taller elements that respond to the scale of new development within the core development area. 8. New development to the south of Scrubs Lane will need to respect the existing Grand Union Canal conservation area; 9. There is also an opportunity to investigate the potential for a safe and secure access to the Cemetery; and 10. Development should be predominantly residential led with opportunities for other uses on the lower levels. New development should include a mix of active commercial uses and residential front doors on street. Where early development is proposed, lower level uses will need to be flexible to respond to a changing environment.

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Regulation 18 Local Plan did not include cluster policies.		

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support principle of tall building on corner of Scrubs Lane/ Harrow Road	Fruition Properties	Noted.
The Harrow Road cluster can deliver a range of uses	Fruition Properties	No change proposed. OPDC considers the range of land uses proposed for the Harrow Cluster in Policy P10C1 to be appropriate and reflect its location, existing land uses and potential development capacity.
Retaining the Chandelier building would restrict the development potential of the cluster from a construction logistics perspective. Retention would also restrict delivery of 2-way cycle lane along Scrubs Lane. Floorspace could be reprovided within the cluster	Fruition Properties	No change proposed. OPDC considers the retention of the Chandelier Building supports the delivery of the P10 vision for Scrubs Lane, continuing the employment heritage of Scrubs Lane and supporting the local economy. This approach is supported by the Scrubs Lane Development Framework Principles which demonstrates the delivery of new cycle lanes are achieveable with the retention of the Chandelier building. The Chandelier Building is also a Building of Local Heritage Interest, identifying it as a non-designated heritage asset and benefiting from policy D8 to secure its conservation and enhancement.
Incorrect reference to complete listing as asset of community value	Fruition Properties	Change proposed. Reference to the correct Asset of Community Value

		listing has been made in P10C1.
Community and employment aspect of this policy is crucial. Development should be sensitive to existing residential development.	David Craine	Noted. London Plan policies and Local Plan policies P10, SP9, D4 and D5 provide guidance to ensure development responds to existing residential areas as sensitive locations.
Harrow Road Cluster could make greater contribution to jobs and homes targets	Fruition Properties	No change proposed. OPDC considers the capacity identified for the site is appropriate and accords with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. The methodology for identifying this capacity is set out in OPDC's Development Capacity Study which is based on indicative capacities provided by the Scrubs Lane Development Framework Principles development capacity assessment. Additional capacity may be appropriate subject to proposals according with national guidance, London Plan Policies and Local Plan Policies.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Specific comments were not provided on this policy.		

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Scrubs Lane Development Framework Principles	Vision A community and employment focused location framed by prominent corner of Harrow Road and Scrubs Lane and a new Old Oak High Street connecting to Willesden Junction.
Development	• Approximately 20,100 new homes can be delivered during the 20

Capacity Study	year plan period including 2,600 new homes within Scrubs Lane. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 1,200 new jobs within Scrubs Lane. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations
Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including: • 5 broad historic themes: o Grand Union Canal; o Rail heritage; o Industrial heritage; o Residential enclaves; and o Scrubland and open space. • a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets. • heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.
Old Oak North	• Within the place of Willesden Junction, Old Oak Street will

Development Framework Principles	continue as a walking and cycling route connecting to Station Approach in the west. To the east a new walking and cycling link will also be delivered to Harrow Road.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal. This includes four key routes in Old Oak. These are: Old Oak High Street, Grand Union Street, Park Road and Wormwood Scrubs Street.	This recommendation has been superseded by the key route network recommended by the Old Oak North Development Framework Principles. Following additional feasibility analysis, Old Oak Street is recommended to be delivered as a walking and cycling route to Station Approach, west of Willesden Junction Station. A walking a cycling route is proposed to be delivered connecting to Harrow Road.

Other evidence base

Supporting Study	Recommendations
	• None

P10C2. Laundry

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

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SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
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	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
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PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Scrubs Lane Vision	Scrubs Lane is an important road connecting Harlesden, Old Oak, and White City which is well used and will continue to be well used. It also provides access to the A40. There is an opportunity to improve the physical environment of this street through robust building, traffic management, new access routes to Old Oak and existing amenity spaces, and the provision of quality public realm for pedestrians and cyclists. Along Scrubs Lane there may be opportunities for early development so long as these developments complement the aspirations of the wider masterplan and support the comprehensive regeneration of the area whilst also achieving suitably high design standards. To the north of the Grand Union Canal this should include new and improved connections from Scrubs Lane into Old Oak North, a significantly improved public realm, access to the canal, and there may also be opportunities to provide new access into the Cemetery. To the south of the Grand Union Canal this should include new and improved

	access to North Pole Depot East that would enable improved connections on to Kensal Canal side Opportunity Area. There should also be opportunities to improve pedestrian and cycle access to both Wormwood Scrubs and Little Wormwood Scrubs which would provide better opportunities for local people to access these important amenity and ecological spaces. Kensal Cemetery and the Grand Union Canal Conservation Areas sit to the east and south of Scrubs Lane. New development will need to be sensitive to these existing heritage assets. To create an attractive place the environment of Scrubs Lane will need to be significantly enhanced, through new high quality development and public realm improvements. These should also create a generous walking and cycle environment along its entire length. Uses in this area will be residential-led with opportunities for a mix of uses at lower levels. At ground level buildings will need to be predominantly either active, or have a mixture of residential entrances with front doors on street. The scale and massing of development along Scrubs Lane will need to be coordinated with that of nearby Opportunity Areas, specifically along the Grand Union Canal to the Kensal Opportunity Area
Scrubs Lane Key Objectives	1. Early regeneration along Scrubs Lane will be encouraged where it complements the aspirations of this planning framework and OPDC's energy policy plans. It will be important that early development achieves the highest quality design and architectural standards to set the right tone for the wider area 2. To the north of the Grand Union Canal new and improved access points should be provided into Old Oak North from Scrubs Lane; 3. To the south of the Grand Union Canal new and improved access to North Pole Depot East should be provided, along with opportunities for pedestrian and cycle access to Wormwood Scrubs and Little Wormwood Scrubs 4. Transport improvements are likely to be required along Scrubs Lane; 5. Public realm improvements including wider footways and high quality cycle infrastructure will be needed linking Scrubs Lane to Wood Lane and further south to White City; 6. Environmental and street greening will be required, including the potential for Sustainable Urban Drainage Systems (SUDS); 7. New development should create a coherent built form onto the street: ƒ Scrubs Lane should be a transition area between the surrounding area and the core development area; ƒ Along the eastern side of the street, development should sensitively respond to adjacent buildings (including the Former Cumberland Park Factory) and to St. Mary's Cemetery; ƒ Along the western side (behind the street front) there will be opportunities for increased massing and taller elements that respond to the scale of new development within the core development area. 8. New development to the south of Scrubs Lane will need to respect the existing Grand Union Canal conservation area; 9. There is also an opportunity to investigate the potential for a safe and secure access to the Cemetery; and 10. Development should be predominantly residential led with opportunities for other uses on the lower levels. New development should include a mix of active commercial uses and residential front doors on street. Where early development is proposed, lower level uses will need to be flexible to respond to a changing environment.

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Regulation 18 Local Plan did not include cluster policies.		

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Green bridge linking Old Oak Gardens and Laundry Lane is not supported. Wording should be changed to a 'bridge'.	Old Oak Park Limited	Change proposed. To reflect recommendations of the Old Oak North Development Framework Principles the policy has been amended to support an all modes route to Old Oak North.
Policy is sound	A Somefun, David Craine	Noted.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Delivering Park Road as an all modes link will be challenging.	Old Oak Park Limited	Noted. The Old Oak North Development Framework Principles has been developed by OPDC based on the outputs of the AECOM masterplan consortium of consultants. The consultants undertook a robust assessment of the technical constraints of Old Oak North to identify deliverable connections to surrounding areas. This work has shown that at a strategic level appropriate for the Local Plan, Park Road is deliverable.
Question local listing of 26-30 Scrubs Lane	Old Oak Park Limited	No change proposed. OPDC's Heritage Strategy undertook an assessment of the OPDC area to identify potential heritage assets. The Strategy considered that

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

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Scrubs Lane Development Framework Principles	Vision A community focused green landscaped route fronted by housing and community uses linking Old Oak Gardens, Scrubs Lane and St. Mary's Cemetery.
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 2,600 new homes within Scrubs Lane. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 1,200 new jobs within Scrubs Lane. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations
Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including: • 5 broad historic themes:

	○ Grand Union Canal; ○ Rail heritage; ○ Industrial heritage; ○ Residential enclaves; and ○ Scrubland and open space. • a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets. • heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.
Old Oak North Development Framework Principles	• Park Road will be an all modes route connecting to Scrubs Lane in the former location of Laundry Lane.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Scrubs Lane Development Framework Principles	A community focused green landscaped route fronted by housing and community uses linking Old Oak Gardens, Scrubs Lane and St. Mary's Cemetery.	This recommendation has been superseded by the key route network recommended by the Old Oak North Development Framework Principles. Laundry Lane as a walking and cycling route is recommended to be replaced with Park Road as an all modes route. The Cluster policy now seeks to deliver a range of uses along this all modes street.

Other evidence base

Supporting Study	Recommendations
	• None

P10C3. Hythe Road

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

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PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Scrubs Lane Vision	Scrubs Lane is an important road connecting Harlesden, Old Oak, and White City which is well used and will continue to be well used. It also provides access to the A40. There is an opportunity to improve the physical environment of this street through robust building, traffic management, new access routes to Old Oak and existing amenity spaces, and the provision of quality public realm for pedestrians and cyclists. Along Scrubs Lane there may be opportunities for early development so long as these developments complement the aspirations of the wider masterplan and support the comprehensive regeneration of the area whilst also achieving suitably high design standards. To the north of the Grand Union Canal this should include new and improved connections from Scrubs Lane into Old Oak North, a significantly improved public realm, access to the canal, and there may also be opportunities to provide new access into the Cemetery. To the south of the Grand Union Canal this should include new and improved

	access to North Pole Depot East that would enable improved connections on to Kensal Canal side Opportunity Area. There should also be opportunities to improve pedestrian and cycle access to both Wormwood Scrubs and Little Wormwood Scrubs which would provide better opportunities for local people to access these important amenity and ecological spaces. Kensal Cemetery and the Grand Union Canal Conservation Areas sit to the east and south of Scrubs Lane. New development will need to be sensitive to these existing heritage assets. To create an attractive place the environment of Scrubs Lane will need to be significantly enhanced, through new high quality development and public realm improvements. These should also create a generous walking and cycle environment along its entire length. Uses in this area will be residential-led with opportunities for a mix of uses at lower levels. At ground level buildings will need to be predominantly either active, or have a mixture of residential entrances with front doors on street. The scale and massing of development along Scrubs Lane will need to be coordinated with that of nearby Opportunity Areas, specifically along the Grand Union Canal to the Kensal Opportunity Area
Scrubs Lane Key Objectives	1. Early regeneration along Scrubs Lane will be encouraged where it complements the aspirations of this planning framework and OPDC's energy policy plans. It will be important that early development achieves the highest quality design and architectural standards to set the right tone for the wider area 2. To the north of the Grand Union Canal new and improved access points should be provided into Old Oak North from Scrubs Lane; 3. To the south of the Grand Union Canal new and improved access to North Pole Depot East should be provided, along with opportunities for pedestrian and cycle access to Wormwood Scrubs and Little Wormwood Scrubs 4. Transport improvements are likely to be required along Scrubs Lane; 5. Public realm improvements including wider footways and high quality cycle infrastructure will be needed linking Scrubs Lane to Wood Lane and further south to White City; 6. Environmental and street greening will be required, including the potential for Sustainable Urban Drainage Systems (SUDS); 7. New development should create a coherent built form onto the street: ƒ Scrubs Lane should be a transition area between the surrounding area and the core development area; ƒ Along the eastern side of the street, development should sensitively respond to adjacent buildings (including the Former Cumberland Park Factory) and to St. Mary's Cemetery; ƒ Along the western side (behind the street front) there will be opportunities for increased massing and taller elements that respond to the scale of new development within the core development area. 8. New development to the south of Scrubs Lane will need to respect the existing Grand Union Canal conservation area; 9. There is also an opportunity to investigate the potential for a safe and secure access to the Cemetery; and 10. Development should be predominantly residential led with opportunities for other uses on the lower levels. New development should include a mix of active commercial uses and residential front doors on street. Where early development is proposed, lower level uses will need to be flexible to respond to a changing environment.

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Regulation 18 Local Plan did not include cluster policies.		

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Policy is sound	A Somefun, David Craine	Noted.

Regulation 19(2) consultation

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

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Scrubs Lane Development Framework Principles	Vision A retail, leisure and community focused cluster framed by railway and industrial heritage that connects Old Oak North, to Scrubs Lane and on to St. Mary's Cemetery. This cluster will provide new and improved walking, cycling and vehicular access into Old Oak North.
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 2,600 new homes within Scrubs Lane. • Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 1,200 new jobs within Scrubs Lane. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations
Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:

	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Old Oak North Development Framework Principles	• The delivery of the West London Line and potential Hythe Road Station on a viaduct within Old Oak North is supported. This requires Hythe Road to be enhanced as a high quality all modes link to Scrubs Lane and the previous proposed additional southern access to be removed.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Public Realm, Walking and Cycling Strategy	Delivery of a new vehicular connection into Old Oak North, north of Hythe Road.	The delivery of the West London Line and potential Hythe Road Station on a viaduct within Old Oak North is supported. This requires Hythe Road to be enhanced as a high quality all modes link to Scrubs Lane and the previous proposed additional southern access to be removed.

Other evidence base

Supporting Study	Recommendations
	• None

P10C4. Mitre Canalside

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Scrubs Lane Vision	Scrubs Lane is an important road connecting Harlesden, Old Oak, and White City which is well used and will continue to be well used. It also provides access to the A40. There is an opportunity to improve the physical environment of this street through robust building, traffic management, new access routes to Old Oak and existing amenity spaces, and the provision of quality public realm for pedestrians and cyclists. Along Scrubs Lane there may be opportunities for early development so long as these developments complement the aspirations of the wider masterplan and support the comprehensive regeneration of the area whilst also achieving suitably high design standards. To the north of the Grand Union Canal this should include new and improved connections from Scrubs Lane into Old Oak North, a significantly improved public realm, access to the canal, and there may also be opportunities to provide new access into the Cemetery. To the south of the Grand Union Canal this should include new and improved

	access to North Pole Depot East that would enable improved connections on to Kensal Canal side Opportunity Area. There should also be opportunities to improve pedestrian and cycle access to both Wormwood Scrubs and Little Wormwood Scrubs which would provide better opportunities for local people to access these important amenity and ecological spaces. Kensal Cemetery and the Grand Union Canal Conservation Areas sit to the east and south of Scrubs Lane. New development will need to be sensitive to these existing heritage assets. To create an attractive place the environment of Scrubs Lane will need to be significantly enhanced, through new high quality development and public realm improvements. These should also create a generous walking and cycle environment along its entire length. Uses in this area will be residential-led with opportunities for a mix of uses at lower levels. At ground level buildings will need to be predominantly either active, or have a mixture of residential entrances with front doors on street. The scale and massing of development along Scrubs Lane will need to be coordinated with that of nearby Opportunity Areas, specifically along the Grand Union Canal to the Kensal Opportunity Area
Scrubs Lane Key Objectives	1. Early regeneration along Scrubs Lane will be encouraged where it complements the aspirations of this planning framework and OPDC's energy policy plans. It will be important that early development achieves the highest quality design and architectural standards to set the right tone for the wider area 2. To the north of the Grand Union Canal new and improved access points should be provided into Old Oak North from Scrubs Lane; 3. To the south of the Grand Union Canal new and improved access to North Pole Depot East should be provided, along with opportunities for pedestrian and cycle access to Wormwood Scrubs and Little Wormwood Scrubs 4. Transport improvements are likely to be required along Scrubs Lane; 5. Public realm improvements including wider footways and high quality cycle infrastructure will be needed linking Scrubs Lane to Wood Lane and further south to White City; 6. Environmental and street greening will be required, including the potential for Sustainable Urban Drainage Systems (SUDS); 7. New development should create a coherent built form onto the street: ƒ Scrubs Lane should be a transition area between the surrounding area and the core development area; ƒ Along the eastern side of the street, development should sensitively respond to adjacent buildings (including the Former Cumberland Park Factory) and to St. Mary's Cemetery; ƒ Along the western side (behind the street front) there will be opportunities for increased massing and taller elements that respond to the scale of new development within the core development area. 8. New development to the south of Scrubs Lane will need to respect the existing Grand Union Canal conservation area; 9. There is also an opportunity to investigate the potential for a safe and secure access to the Cemetery; and 10. Development should be predominantly residential led with opportunities for other uses on the lower levels. New development should include a mix of active commercial uses and residential front doors on street. Where early development is proposed, lower level uses will need to be flexible to respond to a changing environment.

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Regulation 18 consultation

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Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Planning Statement in the Mitre Yard planning application did not consider the air quality of the location of the development	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The comment relates to a planning application's planning statement rather than to the Local Plan.
Improved connectivity wouldn't be achieved by delivering a route through the Mitre Wharf site as no through route exists east of the site, and no plans are in place for such a route.	Boropex Holdings Limited	No change proposed. Policy P10C4 does not seek to deliver a through route through Mitre Wharf to the east. References to improving connectivity seek to deliver improved and new connections to the site.
Support vision for P10C4, but the vision and P10C4(a) should include explicit reference to residential uses.	Boropex Holdings Limited	Change proposed. The vision for the Mitre Canalside Cluster and policy P10C4 have been amended to refer to residential uses.
Location is too sensitive with regard to impact on surrounding heritage assets for a tall building and high density on the eastern side of Scrubs Lane and along the canal. Tall buildings are not the only way to mark important locations/junctions and to support wayfinding. In this case, Mitre Bridge would be the important and characteristic landmark and to help wayfinding.	Royal Borough of Kensington and Chelsea	No change proposed. The approach to building heights along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. An assessment on the impact on relevant heritage assets was carried out to inform the Framework Principles recommendations.

		OPDC considers that building heights are one of the potential ways to support legibility appropriate to the role and scale of Old Oak.
Policy is sound	A Somefun	Noted.
Support the focus on leisure, eating and drinking and communal activity close to the canal.	David Craine	Noted.
Mary Seacole Gardens should be enlarged and enhanced.	Regents Network	Noted. Policy P10C4 seeks to increase the size, quality and accessibility of Mary Seacole Gardens.

Regulation 19(2) consultation

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

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	**Recommendations**
Scrubs Lane Development Framework Principles	Vision A leisure, eating and drinking and community focused canalside location that celebrates the striking relationship of infrastructure and canal heritage with active canal-side spaces and uses.
Development Capacity Study	• Approximately 20,100 new homes can be delivered during the 20 year plan period including 2,600 new homes within Scrubs Lane.

	• Floorspace for approximately 40,400 new jobs can be provided during the 20 year plan period including 1,200 new jobs within Scrubs Lane. • Phasing of development will likely begin in North Acton, Scrubs Lane and non-SIL locations within Park Royal. Development in Old Oak will take place throughout the plan period and beyond.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities. Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	**N/A**	N/A

Other evidence base

Supporting Study	Recommendations
	• None

P11. Willesden Junction

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE OO1	a. In conformity with the London Plan, proposals should contribute towards the comprehensive regeneration of the Old Oak area to help deliver: ƒ a minimum of 24,000 new homes including affordable homes with a mix of tenures and typologies; ƒ 55,000 jobs with a significant provision of this provided as new commercial space focussed around a new hub at the High Speed 2 station. Opportunities should be taken to diversify into new growth sectors and provision should be made for SMEs, micro businesses and affordable workspace; ƒ a full mix of town centre uses which could include the following; retail, leisure, community, health, cultural, entertainment, night-time economy uses, sports facilities, educational, arts, hotels, places of worship, commercial and offices; ƒ a level of new retail that caters for the needs of the development and that complements and enhances nearby centres, while recognising the role retail can play in the shaping of place; ƒ town centre uses should be focussed around public transport hubs, along the new Old Oak High Street and along other major thoroughfares where there are high flows of people; ƒ a highly integrated transport network; and ƒ a new well connected network of streets and amenity spaces that meet the principles of Lifetime Neighbourhoods. b. Proposals should explore the opportunity to attract a variety of catalyst uses, from the small to the large scale, which could help play a role in attracting people to the area and creating a destination. c. Proposals seeking to displace existing employment floorspace from the Strategic Industrial Location (SIL) within Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region.

PRINCIPLE OO2	Proposals should deliver the following movement hierarchy: a. Old Oak High Street and Old Oak Common Station b. Grand Union Street c. Secondary streets (including Grand Union Canal tow parth).
PRINCIPLE OO3	Proposals should deliver the following public amenity spaces in accordance with London Plan table 7.2, the All London Green Grid SPG and the indicative green grid locations outlined in Figure 34: a. Grand Union Square b. Old Oak Square c. Station squares d. Small open spaces
PRINCIPLE OO4	Building heights and densities should: a. accord with London Plan Policy 7.7 and the guidance set out in Principle D3; b. accord with the guidance set out in the table below and depicted in figure 45: i. Sensitive edges ii. Residential led areas iii. Old Oak High Street and at other key destinations iv. Underground and Overground Stations and local vicinity v. Old Oak Common Station and local vicinity c. demonstrate how they provide a transition in scale between adjacent building height and density locations; d. make a positive contribution to the local townscape, the setting of heritage assets and long distance views; e. deliver visual permeability and legibility; f. explore the use of orientation and position of massing elements to deliver a positive relationship to street enclosure and ground level activities taking into account daylight, sunlight and overshadowing issues; and g. take account through their arrangement, of their environmental impacts, in particular on micro-climate, daylight and sunlight and overshadowing of amenity spaces. Further environmental modelling work will be done through the OPDC Local Plan process to consider this in more detail.
PRINCIPLE OO5	Proposals should be informed by local views as shown in figure 29 to assist in shaping the built form, delivering variation in the skyline, conserving heritage assets and their setting and enhancing local legibility.
Old Oak North Vision	Development will be residential-led creating a new Lifetime Neighbourhood. The area will also need to include a level of commercial space focussed around activating Old Oak High Street, Willesden Junction and the Grand Union Canal as key destinations. This area will accommodate a much smaller number of jobs than Old Oak South, which will be the focus for new commercial space. The area requires significant new transport and utility infrastructure to ensure that it is both accessible and operational. Old Oak North will need to include a network of new streets and amenity spaces that meet the needs of all residents along with the provision of a sufficient level of new social infrastructure. Allongside the delivery of a new Hythe Road station, this area presents a fantastic opportunity for early delivery of homes and jobs. As part of this there could be a role for small and large scale catalyst uses to help create a destination and a place.
Old Oak North Key Objectives	1. Early delivery of new homes and infrastructure to encourage the regeneration of the wider area; 2. Development will be residential-led and will make a significant contribution to the overall housing target for the area; 3. Potential for small and large-scale catalyst uses such as a new

	educational facility, sports stadium, sports complex, health, arts, leisure and or cultural centre; 4. New and improved public transport connections, including a new Overground station at Hythe Road and improvements to Willesden Junction station; 5. A new and improved street network, permeable and attractive for social interaction, walking and cycling, providing better connections to the surrounding area including; an accessible bridge of at least 12 metres wide over the West Coast Mainline connecting the EMR site to Willesden Junction, new and improved connections to Scrubs Lane, and new connections over the Grand Union Canal; and 6. Significant provision of new amenity and leisure spaces, connected by a legible and coherent street network: 7. Development should be mindful of existing residential communities in Harlesden, Island Triangle and along Scrubs Lane: and 8. Work with the public sector on a strategy to decontaminate the land.
Old Oak High Street Vision	Old Oak High Street will be one of the main attractions in the core development area. It will provide a key north-south route connecting Harlesden to Wormwood Scrubs and further south. It will provide direct access to Willesden Junction station, Hythe Road station and Old Oak Common station. There will be a hub of Town Centre activities along its length with a mix of amenity spaces. The canal and its surrounding amenity spaces will become a focal point for this new street. There will be a need for new infrastructure to ensure the street is fully connected into its surroundings that must achieve the highest standards for public transport, social interaction and walking and cycling.
Old Oak High Street Key Objectives	Development should: 1. Provide a legible connection between Wormwood Scrubs and Old Oak Common station with Willesden Junction station and Harlesden Town Centre 2. Provide a street environment that is attractive for pedestrians and cyclists along its entire length. There may also be a need for vehicle movement, along either part of the street, or its full length, and these activities will need to be carefully integrated; 3. Provide clear and direct access into Old Oak Common station, Hythe Road Overground station and Willesden Junction station; 4. Deliver a mix of town centre uses typical of a busy London high street; 5. Seek to incorporate active uses (including residential entrances) along its full length of the street (where feasible); 6. Include public green spaces and public squares along its length. It should celebrate the canal as a focal point and include built in Sustainable Urban Drainage and greening measures to address drainage issues in the area; and 7. Explore opportunities for increases in building heights along the street, in recognition of its role and function as a mixed use high street.

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?

The Regulation 18 Local Plan did not include cluster policies.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The proposed links from Willesden Junction Station in the diagram for P11 will not assist in improving connection between Old Oak and Harlesden, and does not reflect Brent's ambition that the Station presents strong frontage to station road.	London Borough of Brent, Local residents	No Change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
Policies for Willesden Junction Station are broadly consistent with TfL's aspirations.	Transport for London (Group Planning)	Noted.
Any proposals for future development of Willesden Maintenance Depot will need to take account of future operational needs. Any dedesignation would be subject to standard rail industry procedures and consultation.	Transport for London (Group Planning)	Noted. No change proposed. OPDC will continue to discuss with TfL on this point.
It should be assumed that bus interchange and standing facilities should be retained, though longer term solution may be found meaning bus standing is not required.	Transport for London (Group Planning)	Noted. OPDC has retained the bus interchange and standing facilities at Willesden Junction station. OPDC will support future work investigating longer term solutions.
Station improvements and delivery of new bridge link should be early priorities.	HGH Planning	Noted. OPDC will the support the earliest delivery feasible for these transport improvements.
Should include public realm improvements for pedestrians walking between Willesden Junction via Station Approach over bridge to Old Oak Lane	Victoria Hollertz	No change proposed. The figure for the Willesden Junction place policy (P11) identifies improvements to the bridge. This is supported by the Victoria Road/ Old Oak Lane supporting study. This is included in OPDC's Infrastructure Delivery Plan.

Support the development and timely delivery of Willesden Junction.	London Borough of Hammersmith and Fulham, David Craine	Noted.
Policy is sound (no justification provided)	Friary Park Preservation Group	Noted.
Lack of clarity about improvements to Willesden Junction station	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No Change proposed. Three improvement options were developed and are outlined in the Wilesden Junction station supporting study. Further work is underway to investigate this further.
Support the views of the Harlesden Neighbourhood Forum on the Willesden Junction place	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
The proposed links from Willesden Junction Station in the diagram for P11 will not assist in improving connection between Old Oak and Harlesden, and does not reflect Brent's ambition that the Station presents strong frontage to station road.	London Borough of Brent, Harlesden Neighbourhood Forum	No change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
Any proposals for future development of Willesden Maintenance Depot will need to take account of future operational needs.	Transport for London (Group Planning)	Change proposed. OPDC will add to the supporting text to make clear the the proposals for future development of Willesden Maintenance Depot will need to take account of future operational needs. The depot is not shown as being deliverable within the plan period any longer.
Station improvements and delivery of new bridge link should be early priorities.	HGH Planning	Noted. No change proposed
should include public realm	Not logged	No change proposed. This is

improvements for pedestrians walking to Old Oak Lane		indicated within Policy P8 and P11
Support the development and timely delivery of Willesden Junction.	London Borough of Hammersmith and Fulham	Noted.
At Willesden Junction, the proposed new High Street should connect to the west via Station Road, rather than to the east to Harrow Road.	Not logged	No Change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
Directing the High Street to connect to Station Road rather than Harrow Road would bring greater benefits to Harlesden Town Centre and in providing appropriate commercial uses along the High Street link.	Not logged	No Change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local plan; one to the east and one to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
Policy is sound (no justification provided)	Friary Park Preservation Group	Noted.
Strongly support improvement to Willesden Junction.	David Craine	Noted.
Support the views of the Harlesden Neighbourhood Forum on the Willesden Junction place	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Primary concern is that Harlesden will not be integrated with the development of Old Oak. The Local Plan does not go far enough in promoting	Harlesden Neighbourhood Forum	No change proposed. There are two links to Willesden Junction station proposed to route north to Harlesden Town Centre in the Local Plan; one to the east and one

improved links.		to the west. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden Town Centre
The RLNS identifies the need to manage impacts of Old Oak on Harlesden Town Centre. The Harlesden Neighbourhood Plan has focused on improvements to Station Road and to regenerating the core of the town centre.	Harlesden Neighbourhood Forum	Noted. The improvements to Station Road are indicated within the place policy.
The Local Plan should revert to the principal link through to Station Road shown in the regulation 18 Local Plan with active frontages adjacent to it.	Harlesden Neighbourhood Forum	Change proposed. The figure has been amended to reflect updated evidence base to show Old Oak Street as a walking and cycling route connecting to Station Approach and another walking and cycling route to the east. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden.
Discrepancy between Fig 3.8, which shows the High Street connecting westwards to Station Road and Figure 4.50	Harlesden Neighbourhood Forum	Change proposed. The figure has been amended to reflect updated evidence base to show Old Oak Street as a walking and cycling route connecting to Station Approach and another walking and cycling route to the east. OPDC are promoting two entrances to the station to ensure that both routes are equally used and the connections to Old Oak benefit Harlesden.
Policy should be that the High Street is proposed to be diverted west in front of the station to join with Station Road and this should be shown in the diagram.	Harlesden Neighbourhood Forum	No change proposed. Station Approach is identified as a key route in the diagram. The high street is an alternative link serving the west desire line.
Development principles for wider area of Willesden Junction should not be driven by station design. Access to	Harlesden Neighbourhood Forum	Noted. No change proposed. The Willesden Junction area is identified as a site for long termdevelopment.

Harlesden Town Centre will be key. Overstation development at the western end with active frontages and the provision of a new entrance facing onto Station Road would bring benefits to Harlesden and its community.		Development will have to take acount of the technical requirements for this station. Access to Harlesden Town centre is key. Overstation development is supported in the policy.

Regulation 19(2) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Willesden Junction Station should be included in earlier phases of development. Willesden Junction Station should be a site allocation. The Plan should state support for over-station development.	London Borough of Brent	Change proposed. The phasing of development is defined in OPDC's Development Capacity Study (DCS) and does not preclude the delivery of new connections between Harlesden, Willesden Junction Station and Old Oak North. The DCS has been developed in accordance with National Planning Practice Guidance for Housing and Employment Land Availability Assessments. This considers deliverability and developability of sites to inform phasing. Based on current information, potential development over and adjacent to the station is challenging due to the inter-related complexities created by railway infrastructure, restricted accessibility and complex land ownerships. These issues are considered to impact on the developability of development above and adjacent to the station resulting in development to currently be envisaged outside of the plan period. However, OPDC has established the Willesden Junction Steering Group involving key stakeholders,

		including the London Borough of Brent, and has commissioned additional work to identify development feasibility and potential capacity. Policy P11 explicitly supports the earlier delivery of new homes and jobs within the plan period by optimising development on and/or adjacent to the station and tracks. Policies SP10 and DI2 also support the timely delivery of development, potentially in advance of identified phasing. In light of the area's potential longer term development capacity, the area to the west of Willesden Junction Station will be shaded to represent development capacity beyond the plan period. No change proposed. Site allocations within the Local Plan are used to help OPDC demonstrate its supply of land for new housing and commercial floorspace. They are not used to identify transport infrastructure. This is the role of OPDC's Infrastructure Delivery Plan. Policy P11 supports the timely delivery of upgrades to Willesden Junction Station.
Location of borough boundaries through Willesden Junction Station has prevented improvements.	John Cox	Noted. Policies P11 and T4 provide guidance for improving Willesden Junction Station.
Wording should be amended to provide flexibility for the delivery of a range of public realm typologies for the station square based on future detailed design.	Transport for London	Change proposed. Supporting text to P11 will be updated to make reference to alternative station public realm layout to ensure the design of public realm responds to future detailed design of improvements to Willesden Junction Station.
Supporting text to Policy P11 should make reference to the	Transport for London	Change proposed. Supporting text to P11 will be

need for stakeholders to agree an approach to station enhancements.		updated to make reference to the need for stakeholders to agree an approach to station enhancements
Welcome the Train Maintenance Depot being delivered outside of the plan period.	Transport for London	Noted.
Transport Orientated Development – should note that the provision of a new bridge link between the Station and the regeneration area to the south, landing in the European Metals Recycling (EMR) site, will bring about significant benefits.	Queens Park Rangers Football Club and Stadium Capital Developments	No change proposed. The supporting text to Policy P2 sets out the benefits and challenges to delivering a new walking and cycling route between Willesden Junction and Old Oak North.
Support for green infrastructure guidance	London Borough of Hammersmith and Fulham	Noted.
The Local Plan does not provide adequate connections to Harlesden town centre. Guidance for the Harlesden Enhancement Strategy is insufficient.	Grand Union Alliance	No change proposed. The Local Plan recognises the importance of connecting with surrounding areas, including Harlesden. Policies SP7, T6 and Place Policies P2, P8, P10 and P10 set out guidance to connect Harlesden through bus services, walking and cycling to Old Oak. No change proposed. Guidance for delivering measures that support the continuing vitality and viability of Harlesden District Town Centre has been consolidated to Policy TCC1. The guidance for the delivering such measures is appropriate to the role of a Local Plan and provides the flexibility to consider proposals on a case by case basis in consultation with the London Borough of Brent and OPDC.
Continued designation of SIL at Willesden Junction Bus Depot restricts connections north and south of railways and should be removed from SIL.	Grand Union Alliance	No change proposed. The Harlesden Bus Depot is required to continue to be designated as SIL in accordance with London Plan Policy 2.17 to continue

		to provide strategic functions as a bus depot and rail freight site. This will help to deliver the following benefits: - Secures sustainable transport services to serve existing and planned growth; - Robust service provision supported accessibility provided by close proximity to Willesden Junction Station; - Employment of over 300 people with training facilities. OPDC has met with Harlesden Neighbourhood Forum during the development of the Revised Draft Local Plan to respond to concerns regarding adjacency to residential uses, environmental impacts and provide a high quality frontage to Station Road. Policy P8 has been updated to address these concerns while continuing to retain the SIL designation. Relevant policy components include: - requiring active and positive frontages on to the public realm - ensuring impacts of SIL uses are mitigated for surrounding housing and publicly accessible open space OPDC will work with landowners and the Harlesden Neighbourhood Forum to explore delivery of improvements to edges of the bus depot.
Consideration needs to be given to promoting early development and conserving and enhancing heritage assets, protecting existing amenity and the impact of Old Oak Sidings (Powerday) on development.	Grand Union Alliance	Noted. The approach to conserving and enhancing heritage assets is set out in Policy D8. A range of policies within the Local Plan and London Plan will be implemented to

		ensure that new development would not cause unacceptable harm to the amenity of existing uses. The Local Plan policies include SP9, D6, EU4, EU5, EU6, P2 and P8. Policies EU6 and P2 provide guidance to ensure that waste management facilities mitigate their impact on amenity.
Figure 4.44 does not depict a cycling route to Harrow Road.	Grand Union Alliance	No change proposed. A walking and cycling route to Harrow Road is illustrated in Figure 4.44 and referenced in the key.
Connections to Harlesden should be clearly defined.	Harlesden Neighbourhood Forum	Noted. The Local Plan recognises the importance of connecting with surrounding areas, including Harlesden. Policies SP7, T6 and Place Policies P2, P8, P10 and P10 set out guidance to connect Harlesden through bus services, walking and cycling to Old Oak.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Capacity Study	• Currently Willesden Junction is not identified for new homes and jobs development in the plan period. However, OPDC will work closely with stakeholders to secure early delivery of development.
Future Employment Growth Sectors Study	There are a number of growth sectors which could be supported in Old Oak and Park Royal including: • Opportunities to retain, strengthen and diversify existing economic strengths. These are focussed on industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent, motor trade activities. The area also appears to have growing strengths in a range of creative industries. • Opportunities to grow, attract and innovate other economic sectors. The nature of development at Old Oak means that future growth is likely to be focused around office uses with key sectors being professional and financial services; and ICT and digital media services. There are also potential opportunities within the low carbon (including clean tech), advanced manufacturing sectors and med-tech/life-science activities.

	Key ways to support these fit into 4 broad themes: • Sector Development • Workspace, Infrastructure and Place making • Skills and Social Inclusion • Evidence and Strategy Examples of recommended measures include setting up specific networking opportunities and sub-groups; targeted business support; supporting the delivery of flexible and affordable workspace for smaller businesses; links with education providers; and maximising transport and accessibility to and within the OPDC area. Some sectors are better suited to particular locations within OPDC's boundary so the spatial recommendations also show potential suitable locations

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Old Oak North Development Framework Principles	• Within the place of Willesden Junction, Old Oak Street will continue as a walking and cycling route connecting to Station Approach in the west. To the east a new walking and cycling link will also be delivered to Harrow Road.
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal. This includes delivering Old Oak High Street as an all modes routes connecting to Harrow Road and enhancements to a walking and cycling connection to Station Approach.
Willesden Junction Station Feasibility Study	The study provides 10 key recommendations: • Capacity enhancements required to accommodate future growth; • Major improvements to station required to meet passenger expectations as an interchange and as a destination in Old Oak area; • Step free access from all entrances to platforms should be provided; • Enhanced intermodal facilities are required with adequate bus, cycle parking and taxi/kiss-and-ride provision located in close proximity to station entrances; • A new primary entrance to the east side of the station is required to provide convenient access to major development areas to the south in Old Oak; • Pedestrian and cycle links to Harlesden Town centre via

	Station Road and Harrow Road mist be enhanced; • Delivery of an east-west unpaid pedestrian and cycle route through, or adjacent to, the station; • Deliver capacity and public realm improvements early in order to enhance the viability of adjacent development plots; • The future use of Willesden Train Maintenance Depot needs to be determined to inform the next phase of station design; • Ensure proposals safeguard the ability to integrate a vehicular link over the West Coast Mainline.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal. This includes delivering Old Oak High Street as an all modes routes connecting to Harrow Road and enhancements to a walking and cycling connection to Station Approach.	This recommendation has been superseded by the key route network recommended by the Old Oak North Development Framework Principles. Following additional feasibility analysis, Old Oak Street is recommended to be delivered as a walking and cycling route to Station Approach, west of Willesden Junction Station. A walking a cycling route is proposed to be delivered connecting to Harrow Road.

Other evidence base

Supporting Study	Recommendations
	• None

P12. Wormwood Scrubs

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; • always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings; • take account of the different roles and character of different areas, • promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; • support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy); • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production); • conserve heritage assets 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; • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Title: Why does good design matter? Paragraph: 001 Reference ID: 26-001-20140306 Revision date: 06 03 2014	Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.
Title: Why does good design achieve? Paragraph: 002 Reference ID: 26-002-20140306 Revision date: 06 03 2014	Good design should: • ensure that development can deliver a wide range of planning objectives • enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being • address the need for different uses sympathetically.
Title: Planning should promote cohesive and vibrant neighbourhoods Paragraph: 014 Reference ID: 26-014-20140306 Revision date: 06 03 2014	Cohesion relies on a neighbourhood having a robust structure and identity. Local and neighbourhood plans can set aspirations for areas considering what is already successful about them and how they could be improved. This might include movement networks, the mix of uses and tenures, the amount and position of open space and local vernacular building materials and styles. The health, wellbeing and quality of life of those who will be using an area will be influenced by its cohesion. The vitality of neighbourhoods is enhanced by creating variety, choice and a mix of uses to attract people to live, work and play in the same area. Interesting and safe neighbourhoods often have a mix of uses which involves different people using the same parts of a building or place at different times of the day, as well as different uses happening in various parts of a building or space at the same time. Neighbourhoods should also cater for a range of demographic groups especially families and older people. A mix of uses will be successful when they are compatible one with another and interact with each other positively avoiding opportunities for conflict. To encourage a mix of uses that are both vibrant and safe buildings can be designed so as to facilitate different access arrangements at different times.

Title: What is a well designed place? Paragraph: 015 Reference ID: 26-015-20140306 Revision date: 06 03 2014	Well designed places are successful and valued. They exhibit qualities that benefit users and the wider area. Well designed new or changing places should: • be functional; • support mixed uses and tenures; • include successful public spaces; • be adaptable and resilient; • have a distinctive character; • be attractive; and • encourage ease of movement.
Title: Which planning processes and tools can we use to help achieve good design? Paragraph: 029 Reference ID: 26-029-20140306 Revision date: 06 03 2014	**In development plans:** The promotion of good design should be sought at all stages in the planning process. At the development plan stage this will be carried out through: • careful plan and policy formulation • the use of proper consultative and participatory techniques • where appropriate the preparation of masterplans, briefs and site specific policies

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
7.1	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
7.4	C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
SD1	Boroughs, through Development Plans and decisions, should: 1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas 2) Support development which creates employment opportunities and housing choice for Londoners

	3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary 4) recognise that larger areas can define their own character and density 5) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function 6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12 7) include ambitious transport mode share targets 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration 9) ensure planning frameworks are subject to public and stakeholder Consultation
D1	Development Plans, area-based strategies and development proposals should address the following: A The form and layout of a place should: 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the

	management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
D2	**Initial evaluation** A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements: 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2) housing type and tenure 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5) air quality and noise levels 6) open space networks, green infrastructure, and water bodies 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8) topography and hydrology 9) land availability 10) existing and emerging development plan designations 11) existing and future uses and demand for new development, including housing requirements and social infrastructure. **Determining capacity for growth** B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised. **Design analysis and visualisation** C Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process. **Design quality and development certainty** D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.

Supplementary Planning Guidance (SPG)

Character and Context SPG

Policy / paragraph reference	**Policy and paragraph text**

Para 3.9-3.10	**1 Place is all around us and everywhere has a distinctive character** Character exists at all scales from the site and neighbourhood level to city-wide. Character forms the setting of all processes and activities for people and communities and can contribute immensely to the quality of life of those communities. This SPG recommends a consistent approach to understanding the character and context of a place across the whole of Greater London that can be applied at any scale and in any location. The elements of character will be broadly common. What will differ is the combination and juxtaposition of elements which make up a place and the respective importance or sensitivities these have to a given type of change.
Para 3.11-3.13	**2 Character is about people and communities** People create places. How places have evolved, their function and the activities they support (both past and present) are pivotal to any understanding of the character of a place. This involves having an understanding of the activity, use and movement within and through a place and its connections and linkages to its surroundings. The experience of any place changes over time and may be very different between night and day vibrant, lively, quiet, empty. How it is used and experienced by all sections of the community including residents, visitors, businesses, young, older and disabled people and, different ethnic groups, etc may also vary significantly. It is important to understand **how places** are perceived, experienced and valued. Places are not just experienced visually but also through memory and association as well as through all the senses. People may value places for different reasons, often reflecting the services or benefits they provide for them. An awareness and appreciation of places in art, literature and music may also be valuable. All these values and experiences are essential to an understanding the character of a place. Those involved in commissioning or undertaking studies should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work. True stakeholder engagement means participation, not just consultation. Stakeholder engagement should be seen as an investment, resulting in more informed outputs and greater ownership of the results and its applications. An assessment of place can help empower people to make decisions about how their local places are managed and changed. Assessments will also be more robust and carry greater weight in the decision-making process.
Para 3.14-3.15	**3 Places are connected and overlap – boundaries and transitions are important** Places do not exist in isolation but are connected to their wider environment. For any place, it is important to understand the wider contextual elements that may influence it – i.e., looking 'outside – in' and 'inside – out', considering proximity and what is on or beyond the boundary, etc. This may include: • the functional and visual relationships between different elements; • how places and spaces interrelate; • how places are experienced sequentially or by different users; • the connections and movement through and between places. The boundaries and transitions between different places are often important and need to be considered in their own right and not just as edges of a place.

	Boundaries between areas of different character are rarely clear on the ground and do not necessarily stop at administrative boundaries. Any assessment of understanding the character and context of a place should therefore be aware and relate to studies on either side of such boundaries, where appropriate.
Para 3.17	**4 The character of a place is a dynamic concept** London is the product of a complex set of inter-related processes and layering of different phases of cultural, social and economic evolution. As change is a fundamental characteristic of London, **respecting character and accommodating change should therefore not be seen as mutually exclusive.** Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. This will vary depending on the environment and what is proposed. It is therefore essential to gain an appreciation of what defines the identity of a location, understand what is special or valued, and how different components may be sensitive or vulnerable, and using this information positively to guide and inform change. In some cases, this may include the creation of areas with a new or altered character.

Old Oak and Park Royal OAPF (2015)

Policy / paragraph reference	**Policy and paragraph text**
PRINCIPLE WS1	The Mayor will: a. Ensure the valuable ecology of Wormwood Scrubs is maintained and where appropriate enhanced; b. Maintain and where appropriate enhance Wormwood Scrubs as an area for exercise and recreation for the inhabitants of the metropolis; c. Improve access to Wormwood Scrubs from the surrounding area; d. Secure resources for the long-term management and maintenance of the Scrubs; e. Carry out detailed discussions with local residents and interest groups, including the Friends of Wormwood Scrubs; and f. Agree any works for any sensitive enhancements to the Scrubs with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham.

Local Plan Regulation 18 Draft Policy Options Key Consultation Issues

Regulation 18 consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
The embankment to the north of the Scrubs should be retained to screen the proposed road on the IEP depot from the Scrubs	Friends of Wormwood Scrubs	Noted. The embankment is located within Wormwood Scrubs. As such it will be managed in accordance with the Wormwood Scrubs Act,

		Commons Act, policy EU1, EU2, P12 and relevant London Plan policies.
Support the vision, so long as the Scrubs is preserved	Friends of Wormwood Scrubs	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
Do not support additional cycle routes on the Scrubs	Friends of Wormwood Scrubs	Noted. To accord with the Wormwood Scrubs Act and to support people reaching destinations, such as stations, and supporting access to Wormwood Scrubs from surrounding areas, policy P12 seeks to deliver new and improved sensitive walking and cycling routes across, to and from Wormwood Scrubs.
Should encouraging use of social infrastructure such as Wormwood Scrubs	Workshop	Noted. To accord with the Wormwood Scrubs Act, policy P12 seeks to improve access to the Scrubs for all Londoners through new and improved sensitive walking and cycling routes from surrounding areas.
Broad support for preservation of Wormwood Scrubs	Diocese of London, Friends of Wormwood Scrubs, Old Oak Park (DP9), TITRA, local resident, Hammersmith and Fulham Historic Buildings Group	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
Clarify reference to nearby housing estate - should this be just Old Oak Estate?	Diocese of London	Noted. Policy wording has been amended to remove reference to nearby housing estate.
Better promotion of Wormwood Scrubs across London would help make it more accessible.	Diocese of London	Noted. The vision for Wormwood Scrubs sets out the aspiration to make the open space more accessible to all Londoners.
Welcome an approach/policy which sets out that OPDC should engage Friends of Wormwood Scrubs in future	Friends of Wormwood Scrubs, London Borough of Hammersmith and Fulham	No change proposed. Policy P12 continues to set out commitments to agreeing proposals with the

work and agree strategy/proposals with them		Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in discussion with local community groups.
Sustaining Local Nature Reserve and sites of borough importance for nature conservation is important	Friends of Wormwood Scrubs, Hammersmith and Fulham Historic Buildings Group	Noted. Policy P12 provides guidance to conserve and enhance environmental designations of Wormwood Scrubs in accordance with policy EU2.
Embankment should be retained as there is no reference to this in the Plan. These are essential and there are agreed ecological enhancements which include works to the embankment. OPDC should engage with LBHF and the Charitable Trust.	Friends of Wormwood Scrubs, workshop, workshop	Noted. The embankment is located within Wormwood Scrubs. As such it will be managed in accordance with the Wormwood Scrubs Act, Commons Act, policies EU1, EU2, P12 and relevant London Plan policies. Policy P12 continues to set out commitments to agreeing proposals with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in discussion with local community groups.
Access must be sensitive to the character of the Scrubs. Need to consider the potential impacts on Wormwood Scrubs from new users.	Friends of Wormwood Scrubs, local resident, workshop	Noted. Any new sensitive walking and cycling routes will be delivered in accordance with the Wormwood Scrubs Act, Commons Act, policies EU1, EU2, P12 and relevant London Plan policies.
The Plan is confusing in relation to access from the north. There are references to access being provided to the north and figures 102 p 253, 105 p 257, 110 p 261 show a potential route from the Station to the Scrubs. Figure 53 p115 does not show this. Also, the IEP depot is in the way of this route but the depot is unlikely to be moved.	Friends of Wormwood Scrubs	Change proposed. Policy P12, its supporting text and supporting diagram set out the envisaged locations of new sensitive walking and cycling routes from Old Oak South and Old Oak North. These are expected to be delivered across a range of phases, including after the relocation of the Intercity Express Programme Depot.
Concern with/oppose access direct from the Station. This would cut through the sensitive north	Friends of Wormwood Scrubs, London Borough of Hammersmith and Fulham, Community Group,	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by

edge/embankment and could impact on the ecology of the site.	workshop, workshop, workshop, workshop, Hammersmith and Fulham Historic Buildings Group	railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. This is reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the station and adjacent areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
No need for access point from the station. Propose an access point at the north east corner of the Scrubs	Friends of Wormwood Scrubs, Midland Terrace Resident's Group, Old Oak Interim Forum, workshop	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy

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

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

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

be consistent with the agreed ecological enhancement programme. Do not have enough information, plans or alternative options to be able to support this proposal.		to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
Any ecological enhancements should be sensitive to the character of the Scrubs and should be decided by the Trust.	Friends of Wormwood Scrubs	Noted. Policy P12 provides guidance to conserve and enhance the biodiversity designations. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
Access from the northern edge is restricted and see no need for a dedicated cycling connection to the Scrubs from the north. It is unclear as to how communities would be connected to the Scrubs.	Friends of Wormwood Scrubs	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are

		reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
Retaining/protecting character of Wormwood Scrubs is the biggest priority. Impacts of increased usage should be considered.	Friends of Wormwood Scrubs, Andy Slaughter, Old Oak Interim Forum, The Hammermsith Society, TITRA, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
Proposals suggested for ecological enhancements/objectives and key locations for this (i.e. scape areas, retaining/improving grassland, hedgerows, flashes, new habitats, improving woodland habitats).	Friends of Wormwood Scrubs	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
There is an area of vegetated embankment that is dominated by Japanese Knotweed; its removal provides an opportunity for habitat creation on site. These work needs to consider and mitigate for any impacts (i.e. on bird population, avoid unnecessary removal, selecting appropriate access routes).	Friends of Wormwood Scrubs	Noted. Any work related to this removal will be carried out in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
There should be range of nesting boxes, dormouse boxes and hibernacula installed on site to support a diverse range of species. Particular locations, types and numbers would need to be discussed further and agreed on site.	Friends of Wormwood Scrubs	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
In order to monitor success	Friends of Wormwood Scrubs	Noted. OPDC carried out a

full baseline surveys should be undertaken and repeated every 2-7 years after work is completed.		Wormwood Scrubs Survey in 2016. This has informed policy P12 and will be used to inform future guidance and enhancements. Future surveys will be subject to further detailed work programming.
Contributions to the production of a 10 year ecological management plan for Wormwood Scrubs including the enhancement and additions to the site.	Friends of Wormwood Scrubs	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
The detailed policy provisions set out for improvement will only be possible if high quality links are established between this space and Old Oak.	London Borough of Ealing	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of

		these routes will be subject to further detailed work in consultation with relevant stakeholders.
Need to recognise the various designations of ecological protection – Site of Borough Grade 1 importance for Nature Conservation and the Local Nature Reserve.	London Borough of Hammersmith and Fulham, Old Oak Interim Forum	Change proposed. Policy P12 requires development to conserve and enhance the Local Nature Reserve and Site of Importance for Nature Conservation designations by ensuring proposals accord with policy EU2;
Concerned about tall buildings being proposed near to the Scrubs.	London Borough of Hammersmith and Fulham, Midland Terrace Resident's Group, Old Oak Interim Forum, The Hammersmith Society, workshop, workshop, workshop, workshop	Noted. Policy D5 provides guidance for managing the impact of tall buildings on their surroundings alongside general guidance for amenity in policy D6. Policy D7 sets out key views, including those from Wormwood Scrubs which proposals will need to include in views assessments.
Support a dedicated cycle route on the eastern border of the Scrubs close to Scrubs Lane. There may be scope for continuing/linking such a route.	Midland Terrace Resident's Group, Old Oak Interim Forum, workshop	Change proposed. Policy P10 proposes the delivery of a segregated two-way cycle line along the eastern edge of Wormwood Scrubs.
The access route should be designed to prevent it being used as a transit route and a boundary should be preserved between the Scrubs and Old Oak South.	Andy Slaughter	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help

		meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
Need to clarify MoD rights over the Scrubs	Old Oak Interim Forum	Noted. Supporting text to policy P12 provides information related to the use of Wormwood Scrubs by the Ministry of Defence.
Sustainable water management options should be explored further	Old Oak Interim Forum	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
Further information should be provided on potential enhancements	Old Oak Park (DP9)	Change proposed. Potential sensitive enhancements are set out in policy P12 having been informed by the Wormwood Scrubs survey carried out in 2016.
The MOL status should be emphasised in the vision and rest of the section.	The Hammersmith Society	Change proposed. Policy P12 clearly sets out the need for development to conserve and enhance Wormwood Scrubs reflecting its designation as Metropolitan Open Land.
Wormwood Scrubs should not be used as a substitute for adequate on site provision or as a construction	The Hammersmith Society	Noted. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a

site.		minimum of 30% of the developable area as publicly accessible open space. This excludes Wormwood Scrubs. The Local Plan does not identify the need for using Wormwood Scrubs for construction purposes. Any proposal would be considered in light of policies in the Local Plan, London Plan and NPPF.
Would oppose any network of hard paths/landscaping.	Friends of Wormwood Scrubs, The Hammersmith Society, workshop, workshop, workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in

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

There is an opportunity for the canal towpath to be connected to the Scrubs.	The Hammersmith Society, workshop, workshop	Change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north, including the Grand Union Canal, and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
This section should include policies to limit light pollution.	The Hammersmith Society	No change proposed. Policy D6 provides guidance for managing the impact of light pollution on private open space. Policy D5 provides guidance for managing the impact of light pollution from tall buildings on surrounding

		areas. London Plan policy 7.6 also provides guidance for managing impact of development on the amenity of surrounding land and uses.
Only drainage to pitch areas should be considered.	The Hammersmith Society	No change proposed. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
The optimal railway scheme will still retain considerable scope for the mixed development of the remainder of the site, which we would strongly support.	The London Forum	Noted.
Wormwood Scrubs should not be seen as an open space for the new Old Oak And Park Royal Development Corporation developments.Separate urban green space should be created and incorporated as part of new development.	TITRA, workshop, workshop, workshop	Noted. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area as publicly accessible open space. This excludes Wormwood Scrubs. The Local Plan does not identify the need for using Wormwood Scrubs for construction purposes. Any proposal would be considered in light of policies in the Local Plan, London Plan and NPPF.
Should not authorise development that encircles and degrades the Scrubs	TITRA	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
Wormwood Scrubs is well used and should remain unchanged.	Local resident	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant

		London Plan policies, policy EU1, policy EU2 and policy P12.
Object to Wormwood Scrubs being included in OPDC area. Wormwood Scrubs should be planned for as a whole, including the stadium and car parks. LBHF should be the planning authority.	resident	No change proposed. OPDC will continue to work with stakeholders, including LB Hammersmith and Fulham to support place-making across the wider area.
OPDC do not need to plan for Wormwood Scrubs as it is protected by its MOL status and the Wormwood Scrubs Act.	resident	No change proposed. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
Are concerned that there may be development on Wormwood Scrubs. This should not be allowed	Resident, workshop, workshop, workshop, workshop	Noted. Policy SP8 and policy EU1 provide guidance for the delivery of open spaces. This includes delivering a minimum of 30% of the developable area as publicly accessible open space. This excludes Wormwood Scrubs.
Planning approach has not evolved much in light of previous comments	workshop	Noted. Policy P12 has been updated to reflect previous comments to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
Could make connections from North and South through Old Oak Common Lane and Wormwood lane	workshop	Noted. Policies P8 and P10 provide guidance for improving walking and cycling routes along Old Oak Common Lane and Scrubs Lane.
Makes no sense to walk through a commercial area to do certain activities	workshop	Noted.
Object to people crossing Scrubs to North Acton	workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local

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

		To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders and would need to appropriately conserve any ecological areas.
Underpass into the Scrubs is not supported	workshop, community group, workshop	Noted. The form of the new walking and cycling connection from Old Oak Common Station will be subject to future detailed design work in consultation with relevant stakeholders.
There is less provision for green space now than there has been in previous documents	workshop	Change proposed. Policy SP8 and policy EU1 provide guidance for the quantum of open spaces to be provided in accordance with the London Plan hierarchy of open spaces. Place policies provide guidance for their spatial distribution. This guidance seeks to deliver a minimum of 30% open space across the developable OPDC area outside of SIL.
Is the location of the HS2 station fixed	workshop	Noted. The location of Old Oak Common Station is fixed and defined by the HS2

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

to the south		into the development fundamental to the successful regeneration of the area. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles document also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
People do not stay at stations	workshop	No change proposed. Policy P1C1 seeks to work with HS2 Limited to deliver a range of town centre uses within and around Old Oak Common Station to provide a destination for west London

		building on precedents such as St. Pancras International and Kings Cross.
There are little gates to access Scrubs to the south	workshop	Noted. Policy P10 seeks to enhance these access points from Scrubs Lane.
Do local people use other parks if they are not using the Scrubs	workshop	Noted.
Question the London Plan's role in this	workshop	Noted. The London Plan is a component element of OPDC's development plan. As such its policies will be used to conserve and enhance Wormwood Scrubs as Metropolitan Open Land.
Oppose cycling on the Scrubs	workshop, workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality

		sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders. Any routes would need to appropriate conserve ecological areas, in accordance with Policies SP8 and EU2.
Not worried about cycling	workshop	Noted.
There should be proper fencing and gates to improve safety and access	workshop	Noted. The supporting text for P12 recognises the need to improve safety on Wormwood Scrubs.
Traffic on Scrubs Lane impacts on environment of Scrubs	workshop, workshop	Noted.
The Scrubs has some surface water issues	workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop, workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
Retain tree planting	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
Question the timespan for proposals	workshop	The 'plan period' for OPDC's Local Plan is 20 years.
Should provide some access into the Scrubs	workshop, Friends of Wormwood Scrubs, Old Oak Park (DP9), workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood

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

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

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

Army has a right to train on Wormwood Scrubs	workshop	Noted. This information is reflected in the supporting text for policy P12.
Potential for more toilet/changing facilities	workshop, workshop, workshop	Noted. Policy P12 provides guidance for delivering ancillary facilities to support the use of Wormwood Scrubs.
There should be opportunities for unstructured/informal activities (bird watching, walking)	workshop, workshop	Noted. Policy P12 provides guidance for delivering sensitive enhancements.
Children's play should be considered. There are opportunities to maintain existing facilities better	workshop, workshop	Noted Policy P12 provides guidance for the delivery of play space.
Support for a café	workshop, workshop, workshop	Noted. Policy P12 provides guidance for delivering ancillary facilities to support the use of Wormwood Scrubs.
Support for existing gym trails	workshop	Noted. Policy P12 provides guidance for delivering ancillary facilities to support the use of Wormwood Scrubs.
Question who manages the pitches	workshop	Noted. Pitches are managed by LB Hammersmith and Fulham.
Support for existing mix of uses	workshop	Noted.
Use for picnics acceptable subject to impact on nature	workshop	Noted.
Support for current arrangements for waste collection/management	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
Could integrate new facilities as part of improved Linford Christie Stadium	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
Station could provide toilet/changing facilities	workshop	Noted.
Toilets have been vandalised in the past	workshop	Noted
Object to lighting	workshop, workshop	No change proposed. Policy D6 provides guidance for managing the impact of light pollution on private open space. Policy D5 provides guidance for managing the impact of light pollution from tall buildings on surrounding

		areas. London Plan policy 7.6 also provides guidance for managing impact of development on the amenity of surrounding land and uses.
Crime and safety concerns particularly at night	workshop	Noted. The supporting text for P12 recognises the need to improve safety on Wormwood Scrubs.
Occasionally cars can be seen on the Scrubs even though its illegal	workshop	Noted.
Pond could be located on western side of scrubs	workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
Could consider additional tree planting	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
Support for pond and role in separating pitches from nature area, nature conservation, whilst using existing topography and being in keeping with the Scrubs	workshop, workshop, workshop, workshop, workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
Object to idea of a pond. Need to discuss/agree with Friends of Wormwood Scrubs	workshop, workshop	Noted. There are current surface water flooding issues on Wormwood Scrubs. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the

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

Should help local schools make better use of the Scrubs	workshop	Noted. The supporting text for P12 recognises the need to improve safety on Wormwood Scrubs.
Query about OPDC's relationship with HS2	workshop	Noted. OPDC is working positively, proactively and transparently with relevant stakeholders including the Department for Transport, High Speed 2, Network Rail and Transport for London to support the delivery of the station, associated works and the comprehensive regeneration of Old Oak South
Potential for ground nesting should be identified	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
Sports pitches should be retained	workshop, workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
Use walking routes to guide people away from nature	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
Could use for emergency landings for Heathrow	workshop	Noted. This is not proposed through the Local Plan and would contradict its designation as MOL.
Running should be encouraged	workshop	Noted. Policy P12 provides guidance for delivering outdoor leisure facilities.
Additional planting is supported	workshop, workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
Integrate this space with Little Wormwood Scrubs	workshop	Change proposed. Policy P12 seeks to improve connections between Little Wormwood Scrubs and Wormwood Scrubs.
Should ensure access for all, including for pushchairs	workshop	Noted. Policy D3 provides guidance for delivering an

		inclusive and accessible environment.
Scrubs supports incredible range of bird life	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
Drainage solutions should be placed near football pitches to help increase there use. Could speak to Kensington Dragons	workshop	Noted. Policy P12 provides guidance to address and help to manage surface water flooding on and around Wormwood Scrubs. This will be implemented in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2, policy EU3 and policy P12.
Need to avoid environmental damage to Scrubs during the construction period, including HS2 proposals	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12. In particular, policy EU2 requires proposals to avoid disturbance to biodiversity during construction.
Question whether prison will remain	workshop	Noted. HMP Wormwood Scrubs is outside of the OPDC area and the scope of the OPDC Local Plan.
Should acknowledge Old Oak Estate	workshop	Noted. The diagram supporting policy P12 identifies Old Oak Estate.
Would like a more gentle, wider, corridor to link the Scrubs with the rest of the area'	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
Liked the fact that Wormwood Scrubs is rural and then has an urban contrast	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
Question about whether more walking and cycling routes planned on Wormwood Scrubs	workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and

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

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

		cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
Wormwood Scrubs needs investment	workshop	Noted. Policy P12 provides guidance to ensure the long-term management and maintenance of Wormwood Scrubs.
Could increase accessibility through a greater focus on events and advertising in the local press and Hammersmith & Fulham borough literature.	workshop	Noted. The vision for Wormwood Scrubs sets out the aspiration to make the open space more accessible to all Londoners.
Having a great tube link will make it more accessible	workshop	Noted.
Linford Christie Stadium is also part of Wormwood Scrubs.	workshop	Noted. Linford Christie Stadium is outside of the OPDC area. OPDC will continue to work with stakeholders, including LB Hammersmith and Fulham to support place-making across the wider area.
Support for managing Scrubs/area for a wide variety of habitats and a large number of species.	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.

Access can be designed to protect nature; for example letting the woodland thicken up to discourage access at sensitive places and opening up gaps at the less sensitive places.	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
Wormwood Scrubs is already used by a wide range of users and for a variety of uses.	workshop	Noted.
Protecting the sport and leisure uses is also important.	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
The importance of Wormwood Scrubs for model aircraft flying should be retained	workshop	Noted. This information will be used to inform future detailed guidance for Wormwood Scrubs.
The integration of conflicting uses will take a special effort.	workshop	Noted. Policy P12 provides guidance to conserve and enhance Wormwood Scrubs in accordance with the Wormwood Scrubs Act, Commons Act, relevant London Plan policies, policy EU1, policy EU2 and policy P12.
Question what alternative plans/proposals would be if link does not happens - will it remain unattractive	workshop	Noted. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation to the east and west. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. To address this severance, OPDC's Public Realm, Walking and Cycling Strategy (2017) recommends the

		delivery of new walking and cycling route(s) to Wormwood Scrubs through and near to Old Oak Common Station to help meet the requirements of the Wormwood Scrubs Act. The Scrubs Lane Development Framework Principles also recommends the delivery of new walking and cycling access points from Scrubs Lane. These recommendations are reflected in policy P12 in the delivery of new high quality sensitive walking and cycling routes directly from the north and other surrounding areas. The exact form and design of these routes will be subject to further detailed work in consultation with relevant stakeholders.
The only route out of the Scrubs is a wobbly old bridge over the Central Line	workshop	Noted.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
There has been a weakening of the theme of retaining the Scrubs as a space that is more wild than tamed. Suggested text edit to the V1 to include stress "more wild than tamed" theme.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The supporting text has been amended to make reference to the need for the Scrubs to remain more wild than tamed.
The role of the Wormwood Scrubs Trust in the management of the Scrubs requires greater emphasis, and their role in permitting any future enhancement works on the Scrubs reiterated.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers that Policy P12 and the supporting text provides clear and appropriate information setting out the role of the Wormwood Scrubs Charitable Trust and the need for any proposals to be agreed with the Trust and the London Borough of

		Hammersmith and Fulham.
Nature of what is considered appropriate ancillary facilities should be clarified, and note should be taken of the proposed café.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. To provide additional clarity regarding potential essential ancillary facilities, the supporting text has been amended to suggest potential uses.
Strongly support policies protecting Scrubs as MOL, and can't envision any special circumstances which would merit harm or any loss.	The Friends of Wormwood Scrubs, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
New walking and cycling routes should not be introduced across the Scrubs.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports

		its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.
Character of the Scrubs should be retained in the face of increased access, greater numbers of users resulting from 3 new access points, light pollution and building heights	The Friends of Wormwood Scrubs, Scott Cawley, Hammersmith Society, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policies P12 and EU1 provide guidance to continue to protect Wormwood Scrubs as Metropolitan Open Land and to conserve and enhance the Scrubs in its role as a Metropolitan Park.
Communities on different sides of the Scrubs should not be connected by new routes through the Scrubs.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling

	Aspinall, Thomas Dyton	Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities are not able to easily make use of the open space. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with Policy P12, requiring proposals to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.
No direct link form the Station itself to the Scrubs is required. The proposed Green Bridge is supported and is the only link that is needed for anyone from the north wishing to access the Scrubs.	The Friends of Wormwood Scrubs, Hammersmith Society, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. As such, existing communities in the

	Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.
An underpass connecting the station the Scrubs is not suitable. The Local Plan is unclear if such a connection is envisaged during the lifetime of the IEP depot.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	No change proposed. Policy P1 sets out that development should contribute to and/or enable the delivery of new and improved walking and cycling routes to Wormwood Scrubs, including within the

	Lynette Hollender, Jeremy Aspinall, Thomas Dyton	surrounds of Old Oak Common Station. Policy P1C1 also seeks to deliver walking and cycling routes from the station to Wormwood Scrubs Street. The Local Plan does not set out the form of these routes from, or adjacent to, the station. Further work will be required in the design of Old Oak Common Station considering the long-term relocation of the Intercity Express Programme Depot to inform the form of connection from the station to Wormwood Scrubs. This work will inform future versions of the Local Plan. Change proposed. Further work will be required in the design of Old Oak Common Station considering the long-term relocation of the Intercity Express Programme Depot to inform the form of connection from the station to Wormwood Scrubs. This work will inform future versions of the Local Plan. To reflect this, OPDC has amended the supporting text.
Policy should clearly state that the embankment along the northern edge of the Scrubs should be retained.	The Friends of Wormwood Scrubs, Wormwood Scrubs Charitable Trust, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy SP8 and EU2 seek to deliver a net gain in biodiversity including measurably conserving and enhancing Sites of Importance for Nature Conservation (SINC). Wormwood Scrubs and the embankment benefit for a number of SINC designations . This guidance is referred to in Policy P12. In light of this guidance to conserve and enhance biodiversity assets, the roles of Wormwood Scrubs as Metropolitan Open Land and a Metropolitan Park, OPDC considers that Policy P12

		provides appropriate guidance to ensure Wormwood Scrubs continues to be cherished public open space.
Oppose narrative that vegetation restricts walking and cycling access. Vegetation and woodland should not be lost to allow unneeded additional access.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to

		reach these destinations. New and enhanced access points will be implemented in accordance with Policy P12 to agree any proposals with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1(a) in the protection of Metropolitan Open Land.
No new entrances from Old Oak Common Lane are required. Cycle routes from Old Oak Common Lane are not supported.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Walking and cycling access to Wormwood Scrubs is currently restricted by poor quality walking and cycling routes from Old Oak Common Lane. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit. As such, existing communities in the north and west are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided

		from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with the requirement within Policy P12 that any proposals are agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1 on the protection of Metropolitan Open Land.
Location of proposed cycle route along Wormwood Scrubs Street is not clear - if located within Scrubs then it should be opposed.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	The Local Plan appendix confirms that all figures in the Local Plan should be treated as indicative reflecting the role of the Local Plan. Place policy figures are identified as diagrams in the introduction to the places chapter. OPDC considers that this level of detail within the figures are appropriate to the role of the Local Plan. A future Old Oak North and Scrubs Lane Supplementary Planning Document (SPD) will be developed in due course. This will provide further proposed detailed guidance for the location and design of the cycle and pedestrian route along the west of Scrubs Lane. A draft of the Scrubs Lane SPD will be subject to public consultation provide opportunities to comment on and shape these detailed proposals.
Additional text required to clarify legal protection of the Scrubs.	The Friends of Wormwood Scrubs, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy	Change proposed. To provide clarity regarding the roles of stakeholders, OPDC has amended the supporting text.

	Aspinall, Thomas Dyton	
Figure 4.52 does not accurately reflect the area that currently has playing pitches. Sport England would object to any loss of these playing pitches.	Sport England	Change proposed. Figure 4.52 has been amended to reflect the existing provision of playing fields.
Support improving access to Wormwood Scrubs.	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
It is appropriate that access to Wormwood Scrubs is improved and increased and that it provides a wide range of appropriate uses and functions.	Mayor of London	Noted.
Support for P12 vision	Victoria Hollertz, ArtWest	Noted.
Support the retention of Wormwood Scrubs as Metropolitan Open Land and the role of the Scrubs as a District and Metropolitan park for all.	London Borough of Hammersmith and Fulham	Noted.
The lack of detail about monitoring to ensure continued biodiversity makes this policy unsound	Friary Park Preservation Group	No change proposed. Policy EU2 provides guidance to ensure the measurable conservation and enhancement of Sites of Importance for Nature Conservation and other identified priority habitats or species.
There should be no enhancements and new access of any sort to Wormwood Scrubs.	Sarah Abrahart	No change proposed. The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality

		walking and cycling routes in the east and west. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan.
New access points to Wormwood Scrubs and facilities need to be sensitive to areas of greatest biodiversity value.	Hammersmith and Fulham Historic Buildings Group	Noted. Policies SP8, EU2, P12 and P1 provide guidance to ensure new access points and facilities conserve and enhance biodiversity assets.
P12 policy vision should recognise that the Scrubs is a Metropolitan Open Space	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Policy P12 vision identifies Wormwood Scrubs as Metropolitan Open Land.
Should protect and undertake limited enhancements to Wormwood Scrubs	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph	No change proposed. The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive

	Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality walking and cycling routes in the east and west. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan.
Wormwood Scrubs should not be used as justification for on-site open space and it should not be used as a construction site.	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. Policy EU1 seeks to deliver a minimum of 30% of the developable area outside of SIL as publicly accessible open space. This does not include Wormwood Scrubs. Wormwood Scrubs would be protected from use as a construction site through the implementation

		of policies P12, EU1 and EU2.
Only drainage of the pitches should be considered and Wormwood Scrubs should not be impacted by drainage measures within the development area	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Any potential use of Wormwood Scrubs as part of a strategic water management role would be carried out in accordance with policies P12, EU1, EU2 and EU3 to ensure the Scrubs continue to be a cherished public open space, important ecological asset and a protected area of Metropolitan Open Land.
Support the need for proposals to be agreed by LBHF and Wormwood Scrubs Charitable Trust	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Wormwood Scrubs is not a strategic site and would benefit from neighbourhood plan guidance.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. On 12 September 2017 OPDC Board designated the Old Oak Neighbourhood Area which did not include Wormwood Scrubs. The determination was informed by a policy and factual matrix. Determination material is available to view online: https://www.london.gov.uk/moderngovopdc/ieListDocuments.aspx?CId=378&MId=6074&Ver=4
Need local residents input into enchancements to the Scrubs. Removal of the Scrubs from the Neighbourhood Area has curtailed this.	Old Oak Interim Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's Statement of Community Involvement sets out OPDC's commitment to deliver high quality community consultation and engagement. This would include any proposals to enhance Wormwood Scrubs and any further relevant planning guidance.
Enhancements need to be	Old Oak Interim	Noted. Policy P12 provides

accompanied by more effective management.	Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	guidance to secure resources to deliver effective management. Use of these resources will be agreed with the Wormwood Scrubs Charitable Trust and the London Borough of Hammersmith and Fulham
Playing fields on Wormwood Scrubs should be protected. Walking and cycling routes should not dissect playing fields.	Sport England	Noted. Playing fields are a component element of Wormwood Scrubs. As such they benefit from policies P12, SP8 and EU2 to conserve and enhance publicly accessible open space. As social infrastructure, these are also protected by Policy TCC4.
Support policies stating that Wormwood Scrubs and nearly parks should be improved, provided improvements are based on a robust PPS.	Sport England	Noted.
Policies for addressing flooding are not justified by evidence base	Wormwood Scrubs Charitable Trust	No change proposed. OPDC's Integrated Water Management Strategy identifies that there is a tendency for surface water on Wormwood Scrubs which needs to be addressed as part of proposals.
Evidence should be provided for the need for any routes and enhancements to the Scrubs.	Wormwood Scrubs Charitable Trust	Noted. The Wormwood Scrubs Survey was carried out to help understand people's views of Wormwood Scrubs and identify any potential opportunities for sensitive improvements. The outcomes of the survey showed that the most popular improvements were cited as a café, toilets, litter management, lighting and security and new play equipment. Walking and cycling access to Wormwood Scrubs is currently restricted by railways in the north and vegetation and poor quality

		walking and cycling routes in the east and west. This is evidenced by OPDC's Public Realm, Walking and Cycling Strategy Appendix 3: Pedestrian Environment Review System Audit and Appendix 4: Cycle Network Assessment. As such, existing communities in the north are not able to easily make use of the open space. With the regeneration of Old Oak, new communities will also have difficulty in reaching this local asset to support their health and well-being. The Wormwood Scrubs Act states that the Scrubs should be enhanced as an area for exercise and recreation for the inhabitants of the metropolis. The London Plan also supports its function as a Metropolitan Park, providing for the strategic open space needs of the London area. As such, sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan. New and enhanced access should be provided from all areas around the Scrubs and be of a sufficient capacity to enable people to reach these destinations. New and enhanced access points will be implemented in accordance with Policy P12 which requires any proposals to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith and Fulham and in accordance with Policy EU1

		in the protection of Metropolitan Open Land.
Segregated two way cycle lane along Scrubs Lane should not encroach upon the Scrubs.	Wormwood Scrubs Charitable Trust	The Local Plan Appendix confirms that all figures in the Local Plan should be treated as indicative reflecting the role of the Local Plan. Place policy figures are identified as diagrams in the introduction to the places chapter. Figure 4.42 (Scrubs Lane Place) shows the proposed segregated cycle lane adjacent to the eastern edge of Wormwood Scrubs. OPDC considers that this level of detail within the figures are appropriate to the role of the Local Plan. A future proposed Old Oak North and Scrubs Lane Supplementary Planning Document (SPD) will be developed in due course. This will provide further proposed detailed guidance for the location and design of the cycle and pedestrian route along the west of Scrubs Lane. A draft of the SPD will be subject to public consultation provide opportunities to comment on and shape these detailed proposals.

Regulation 19(1) consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
How will biodiversity in the north of Wormwood Scrubs should be protected	Robert Covell	No change proposed. Biodiversity assets on Wormwood Scrubs will be protected and enhanced in accordance with polices P12 and EU2.
A wildlife/nature water feature could increase biodiversity value and help address flooding.	Robert Covell	Noted. This is reflected in Policy P12.

The sections of Wormwood Scrubs along the west, north and eastern boundaries are particularly valuable habitats for wildlife and woodland and require special protection.	Robert Covell	Noted. No change proposed. These habitats are designated as either Local Nature Reserves or Sites of Importance for Nature Conservation of Metropolitan Importance, and are identified in Policy EU2.
OPDC should work with wildlife groups to ascertain if a wildlife/nature reserve feature such as a pond or marshland could be delivered on the Scrubs. This could include wetlands which could support wilder flood alleviation issues.	Robert Covell	Noted. The supporting text to Policy P12 identifies that potential future enhancements may be implemented on Wormwood Scrubs in agreement with the Wormwood Scrubs Charitable Trust and other stakeholders.
The labelling of Wormwood Scrubs Street on Figure 4.45 indicates that it may be located within Wormwood Scrubs itself. It is important that this is amended and the exact location clarified.	The Friends of Wormwood Scrubs	Change proposed. Figure 4.45 has been amended so that the label for Wormwood Scrubs Street clearly indicates the location of the street outside of the Scrubs.
Welcome the inclusion of the term "more wild than tamed" regarding the Wormwood Scrubs, though disappointed this is not included in the vision.	The Friends of Wormwood Scrubs	Noted.
Comments from the previous Local Plan consultation on enhancements and improving access to Wormwood Scrubs still apply to this version of the Plan.	The Friends of Wormwood Scrubs	Noted
Policy P12 does not place enough emphasis on the important sports function of Wormwood Scrubs, and should clearly state that the Scrubs should be protected as a playing field in addition to it other statutory protections. It should also acknowledge the role of Linford Christie Stadium, and the relationship between Stadium and activities on the Scrubs.	Sport England, London Borough of Hammersmith and Fulham, Wormwood Scrubs Charitable Trust	Change proposed. OPDC agrees that the sports function of the Scrubs requires greater emphasis. Additional text has been included in the supporting text of Policy P12 to highlight the role of the playing fields within the Scrubs and their protections. Although Linford Christie Stadium itself is not located within the OPDC boundary, text has also been included referencing the relationship of the stadium and activities in the Scrubs.

References to "sports pitches" should be amended to "playing field" to be consistent with the NPPF and to ensure that protection of playing fields under the NPPF applies to Wormwood Scrubs.	Sport England	Change proposed. References to "sports pitch" have been amended to "playing field".
The Wormwood Scrubs Charitable Trust (WSCT) has management responsibility for the Scrubs. The Council (LBHF) is sole corporate trustee. The WSCT Committee has responsibility for managing the Trust ensuring it achieves its charitable objectives.	Wormwood Scrubs Charitable Trust	Noted.
Welcome Chairman's continued support for protecting Wormwood Scrubs, but don't feel the Plan itself properly recognises it's range of habitats and land uses.	Wormwood Scrubs Charitable Trust	No change proposed. The Local Plan sets out and defines the habitats and uses of the Scrubs as appropriate for a strategic planning document. The Policies Map, which supports the Local Plan, provides detailed locations of relevant habitats.
The number and location of new access points to Wormwood Scrubs is concerning. Any access points should be described by the plan as indicative until more detailed work is undertaken to understand its biodiversity value and any potential damage new connections may cause.	Wormwood Scrubs Charitable Trust, Grand Union Alliance	Change proposed. All figures in the Local Plan are indicative, and this is stated in the Local Plan Appendix. This text has now been included within the introduction of the Local Plan itself for greater clarify. Following the publication of the management plan being prepared by the Wormwood Scrubs Charitable Trust and LBHF, the location of existing routes will be updated in relevant planning guidance.
The Wormwood Scrubs Charitable Trust is working with LBHF on a project to improve the ecological spaces of the Scrubs, including a long-term management plan to maximise biodiversity opportunity by considering all	Wormwood Scrubs Charitable Trust, London Borough of Hammersmith and Fulham	Change proposed. As the management plan has not yet been published, the Local Plan cannot include it as evidence base or base policies on its contents. However, supporting text to Policy P12 will be amended to refer to the document and

aspects of the use of the Scrubs. This plan should be referenced in the Local plan and be in place before any proposals to improve or change the Scrubs are made. The Vision, Policy and supporting text for P12 should reference that the Scrubs will be enhanced and managed in accordable with the management plan.		it's intended role and function. When complete, the Management Plan will inform future planning guidance, including future updates to the Local Plan.
Figure 4.45 should be amended to better show the different spaces and habitats within Wormwood Scrubs, but should not show any of the existing routes through the Park as these are just desire lines and will be updated by the future management plan. The position of key routes proposed surrounding the Scrubs should be clearly marked, with the route along the southern boundary identified as a green routes.	Wormwood Scrubs Charitable Trust	Changed proposed. The place figure for Policy P12 has been amended to show the route along the southern boundary of Wormwood Scrubs as a walking and cycling route. The habitats and spaces of the scrubs have been identified in the place figure in appropriate detail for a strategic planning document. The Policies Map, which supports the Local Plan, provides detailed locations of relevant habitats. It is considered appropriate to identify the existing routes within Wormwood Scrubs as they reflect the current movement network. Any proposals for new and/or enhanced routes within the Scrubs will be identified in the Management Plan being prepared by the Trust and this will inform future updates to the Local Plan. The key routes surrounding the Scrubs have been clearly identified in the current figure, including the existing key routes of Scrubs Lane, Old Oak Common Lane and Baybrook Street, and the future proposed key route of Wormwood Scrubs Street north of the Scrubs.

A land use policy should within P12 and reflect the sensitivity of habitat and the needs identified in the GIOSSMP and other LBHF strategy documents.	Wormwood Scrubs Charitable Trust	No change proposed. The Local plan does not seek to deliver new development on Wormwood Scrubs given the protections that are in place, so proposed land uses are no considered appropriate within the policy. Future uses of the Scrubs will be informed by relevant evidence base studies, including the proposed Management Plan.
SUDS is just one way the Scrubs can contribute to Climate change resilience. Its strategic value should be in dealing with on-site flooding issues not receiving run off from other sites.	Wormwood Scrubs Charitable Trust	Noted. The potential for delivering strategic SuDS on to Wormwood Scrubs as sensitive interventions will only be necessary if identified to be required and agreed by the Trust.
Point (g) of Policy P12 on Connections should be called public realm and movement to be consistent with other Places. It should consider routes and access according to character typology as much or more than the needs of surrounding development to access the Scrubs.	Wormwood Scrubs Charitable Trust	Change proposed. 'Connections' is now referred to as ' Public realm and movement'. Existing text sets out the requirements for sensitive conservation and enhancements of the Scrubs, and any new routes will be required to deliver this.
A Heritage and Character policy should be should be included within P12 to reflect the heritage value of the Scrubs.	Wormwood Scrubs Charitable Trust	No change proposed. Wormwood Scrubs does not benefit from any heritage designations. OPDC's Heritage Strategy identifies Wormwood Scrubs as a heritage theme, and this is reflected in Policy D8 (Heritage).
Para WS5 should included less detail of the 2016 Wormwood Scrubs Survey as this will be updated and replaced by the Charitable Trusts/LBHF's Management Plan. The Management Plan should also be added to the Local Plan evidence base.	Wormwood Scrubs Charitable Trust	No change proposed. The Wormwood Scrubs Survey currently represents the most up to date evidence on which to inform potential improvements to Scrubs. The Management Plan is not complete and so cannot be included as part of the Local Plan evidence base. When complete, it will inform future updates to the Local Plan. Text highlighting the role

		and function of the Management Plan has been included elsewhere in the supporting text to Policy P12.
Fig 4.45 should be more cognoscente of Fig 6.3 and Policy SP8	Wormwood Scrubs Charitable Trust	Change proposed. The key for the place figure to Policy P12 has been amended to highlight the existing habits as the Local Nature Reserves, as per Policy EU2.
We support the aims of the policy to improve access to Wormwood Scrubs for all Londoners.	Queens Park Rangers Football Club and Stadium Capital Developments	Noted.
Support the retention of Wormwood Scrubs as Metropolitan Open Land and its role as a Metropolitan Park.	London Borough of Hammersmith and Fulham	Noted.
The sections of Wormwood Scrubs along the west, north and eastern boundaries are particularly valuable habitats for wildlife and woodland and require special protection.	Robert Covell	Noted. No change proposed. These habitats are designated as either Local Nature Reserves or Sites of Importance for Nature Conservation of Metropolitan Importance, and are identified in Policy EU2.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Wormwood Scrubs Survey	• 28 questions were asked of surrounding residents and users of on the Scrubs. A report has been produced summarising the results of the survey. There were almost 400 responses to the survey. The responses which have informed policy development are: • Many make good use of Wormwood Scrubs and visit it weekly and all-through the year, but equally some people have never used the Scrubs or use it very infrequently. • Most people use the Scrubs to relax and exercise. • People most value the Scrubs for its natural wild areas, trees and grassed areas. • The existing facilities which scored the worst were toilets, flower beds and changing facilities. • The new or improved facilities that people would most like to see are a café, toilets, litter removal, more lighting and security.

Old Oak North Development Framework Principles	Provide a walking and cycling connection from Old Oak Street to Wormwood Scrubs via a high quality bridge.

Heritage Strategy	Outline a number of recommendations which require consideration in the development of policies and masterplans, and the development of schemes, including:
	• 5 broad historic themes:
	  ○ Grand Union Canal;
	  ○ Rail heritage;
	  ○ Industrial heritage;
	  ○ Residential enclaves; and
	  ○ Scrubland and open space.
	• a number of character areas which are more sensitive to change than others, particularly where a number of historic features or assets.
	• heritage assets recommended for local listing and therefore should be retained or reflected as part of any future development.

Public Realm, Walking and Cycling Strategy	The study provides 10 key recommendations to improve walking, cycling, streets and public realm in Old Oak and Park Royal including new and improved connections to Wormwood Scrubs
Sites of Importance for Nature Conservation Statement	OPDC will utilise the Boroughs evidence base to designate SINCs as part of the Local Plan. This will result in no change to current SINC designations from existing Planning Policy.
Scrubs Lane Development Framework Principles	Deliver enhanced sensitive access points to Wormwood Scrubs from Scrubs Lane with improved connections to Little Wormwood Scrubs.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	**N/A**	N/A

Other evidence base

Supporting Study	Recommendations
	• None