

Policy Formulation Reports Delivery and Implementation Chapter

October 2018



DI1: Balancing priorities

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

| Policy / paragraph reference | Policy and paragraph text |
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| 15 | Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. |
| 173 | Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. |
| 174 | Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence. |
| 175 | Where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan. The Community Infrastructure Levy should support and incentivise new development, particularly by placing control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place |
| 203 | Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. |
| 204 | Planning obligations should only be sought where they meet all of the following tests: |

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| | <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development. |
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National Planning Practice Guidance (NPPG)

Community Infrastructure Levy

| Policy / paragraph reference | Policy and paragraph text |
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| 011 | <p>In relation to the levy, the relevant Plan is the Local Plan in England, Local Development Plan in Wales, and the London Plan in London.</p> <p>Charging schedules are not formally part of the relevant Plan, but charging schedules and relevant Plans should inform and be generally consistent with each other.</p> <p>Charging authorities should think strategically in their use of the levy to ensure that key infrastructure priorities are delivered to facilitate growth and the economic benefit of the wider area.</p> |

Local Plans

| Policy / paragraph reference | Policy and paragraph text |
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| 018 | <p>A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the <u>viability of development</u>.</p> <p>Where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself.</p> |

London Plan (2016) Policies

| Policy / paragraph reference | Policy and paragraph text |
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| | A The Mayor will, and boroughs and relevant stakeholders should: |

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| 4.5 | <p>a) support London’s visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London</p> <p>b) seek to achieve 40,000 net additional hotel bedrooms by 2036, of which at least 10 per cent¹ should be wheelchair accessible</p> <p>c) ensure that new visitor accommodation is in appropriate locations: – beyond the Central Activities Zone (CAZ) it should be focussed in town centres and opportunity and intensification areas, where there is good public transport access to central London and international and national transport termini</p> <p>d) support provision for business visitors, including high quality, large scale convention facilities in or around the CAZ</p> <p>C LDFs should:</p> <p>a) seek to ensure that all new visitor accommodation meets the highest standards of accessibility and inclusion and encourage applicants to submit an accessibility management plan with their proposals</p> <p>b) promote high quality design of new visitor accommodation so that it may be accredited by the National Quality Assurance Scheme</p> <p>c) identify opportunities for renovation of the existing visitor accommodation stock</p> <p>d) promote and facilitate development of a range of visitor accommodation, such as hotels, bed and breakfast accommodation, self-catering facilities, youth hostels and camping and caravan sites</p> <p>e) support and encourage development of good quality budget category hotels, especially in outer London.</p> |
| 7.1 | <p>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.</p> |
| 8.1 | <p>A The Mayor will work collaboratively to deliver a positive approach to enabling new development in London, optimising land use and promoting/enabling locations for strategic development.</p> <p>B The Mayor will consider promoting the establishment of further Mayoral Development Corporations (MDCs) and Enterprise Zones (EZs) as well as further Tax Increment Finance (TIF) initiatives where they would assist significantly with realising substantial development potential.</p> <p>C The Mayor will work with boroughs, infrastructure providers, national government, regulators and others involved in infrastructure planning, funding and implementation to ensure the effective development and delivery of the infrastructure needed to support the sustainable management of growth in London and maintain its status as a world city in accordance with the vision and objectives set in Policy 1.1.</p> |
| 8.2 | <p>F Boroughs should set out a clear framework for negotiations on planning obligations in DPDs having regard to relevant legislation, central Government policy and guidance and local and strategic considerations to the effect that:</p> <p>a It will be a material consideration whether a development makes an</p> |

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| 8.3 | <p>appropriate contribution or other provision (or some combination thereof) towards meeting the requirements made necessary by, and related to, the proposed development</p> <p>b Negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and kind to the proposed development and its impact on a wider area</p> <p>c Boroughs must refer to planning obligations that would be sought in the relevant parts of the DPDs (such as transport and housing policies).</p> <p>D The Mayor will work with boroughs to ensure that priorities for the application of the CIL for strategically important infrastructure are identified through the LDF process, particularly to support development of opportunity and intensification areas.</p> |
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Draft New London Plan (2017) Policies

| Policy / paragraph reference | Policy and paragraph text |
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| GG2 | <p>To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:</p> <p>A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.</p> <p>B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.</p> <p>C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.</p> <p>D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.</p> <p>E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.</p> <p>F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.</p> |
| DF1 | <p>Delivery of the Plan and Planning Obligations</p> <p>A Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery.</p> <p>B If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application.</p> <p>C Where it is accepted that viability of a specific site should be considered</p> |

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| | <p>as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG.</p> <p>D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:</p> <p>1) Recognise the role large sites can play in delivering necessary health and education infrastructure; and</p> <p>2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth.</p> <p>E Boroughs are also encouraged to take account of part D in developing their Community Infrastructure Levy Charging Schedule and Regulation 123 list.</p> |
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Supplementary Planning Guidance (SPG)

Old Oak and Park Royal OAPF (2015)

| Policy / paragraph reference | Policy and paragraph text |
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| Principle DL1 | <p>Proposals must:</p> <p>a. Ensure a comprehensive approach to the regeneration of the area, development that restricts the ability to secure the comprehensive regeneration of the area will not be supported;</p> <p>b. Demonstrate joined up working between key stakeholders such as the public and private sector landowners, local authorities, statutory undertakers and infrastructure providers and adjacent landowners and developers;</p> <p>c. Optimise development and accelerate delivery of public sector assets by ensuring that public sector landowners are joined up and have an aligned strategy; and</p> <p>d. Kick start regeneration in advance of the planned Old Oak Common station in 2026;</p> |
| Principle DL2 | Proposals should provide the necessary infrastructure to support the needs of development. |

Local Plan Regulation 18 Draft Policy Options

| Policy / paragraph reference | Policy and paragraph text |
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| | No alternative policy options were considered. |

Key Consultation Issues

Regulation 18 consultation

| What is the issue? | Who raised the issue? | What are we doing to address the issue? |
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| <p>Infrastructure Delivery: Concern raised over various aspects of infrastructure delivery, including education - with the Boroughs concerned regarding the ability of the existing schools capacity to expand; and health – the need to be flexible with this.</p> | <p>Old Oak Park (DP9), HUDU, Hammersmith and Fulham Council, Grand Union Alliance, Brent Council, 3 local residents</p> | <p>Change proposed. Further work on education provision has been undertaken as part of OPDC's Education and Health Needs Study. This identifies that there are schools that can be expanded off-site to meet the needs of early phases of development. The revised Local Plan also now clearly identifies the needs for on-site provision. The supporting text to Policy TCC4 recognises that this need is based on current population projections based on tenure, mix and capacity assumptions and that this need might flex over time and needs to be carefully monitored and that there therefore needs to be a degree of flexibility in the approach taken to social infrastructure provision.</p> |
| <p>Infrastructure Prioritisation: Various opinions expressed regarding what infrastructure should be prioritised.</p> <p>Consensus that education and health in particular are important for social infrastructure. Improvements to Willesden Junction Station also got particular mention.</p> | <p>Brent Council, Diocese of London, 15 local residents</p> | <p>Change proposed. Education and health needs have been informed by OPDC's Education and Health Study. Needs are contingent on the speed of delivery and type of housing (tenure, size, quantum), but the Infrastructure Delivery Plan (IDP) identifies likely dates that facilities need to be delivered or expanded. On-site requirements have had sites allocated and these are referenced in Policy TCC4 and in the relevant place policies.</p> |
| <p>Infrastructure costs and funding gap: Some concern were expressed regarding the level of funding gap, how this would be covered and</p> | <p>Grand Union Alliance, Hammersmith and Fulham Disability Forum, Old Oak Park (DP9)</p> | <p>Change proposed. The revised Local Plan sets out further detail in the Delivery and Implementation chapter on the strategies that OPDC</p> |

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| <p>the impact this could have on the delivery of Affordable Housing.</p> | | <p>will employ to support the timely regeneration of the area and secure the necessary infrastructure to support the needs of the new population. OPDC's Local Plan is supported by an Affordable Housing Viability Assessment and Whole Plan Viability Assessment, which has assessed the viability of affordable housing delivery to inform OPDC's affordable housing policy. The Delivery and Implementation chapter recognises that a balance will have to be struck between the requirements of the Local Plan and the priorities to deliver affordable housing, sustainability standards and infrastructure.</p> |
| <p>Table 16: Infrastructure requirements additional items: Requests were made to add items to Table 16:</p> <ul style="list-style-type: none"> - Mitre Road Bridge; - Additional capacity on North and West London Lines; - Infrastructure to support operation of the Grand Union Canal; - Public realm enhancements; - Cycling facilities; - Items from Park Royal Transport Strategy; - Soil treatment; - Link to Kensal canalside; - Future of Grand Union Canal sub surface 132kV cables; and - Waste disposal facilities. | <p>GLA, TfL, Hammersmith and Fulham Council, Brent Council, The Hammersmith Society and 2 local residents</p> | <p>Change proposed. OPDC's evidence base has been significantly updated between the Regulation 18 and Regulation 19 versions of the Local Plan. The Regulation 19 Plan includes a longer list of infrastructure requirements, informed by this evidence. Suggested infrastructure items were considered as part of this evidence. OPDC's Infrastructure Delivery Plan (IDP) supports the Local Plan and sets out the required infrastructure to support development in the area.</p> |

Regulation 19(1) consultation

| What is the issue? | Who raised the issue? | What are we doing to address the issue? |
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| <p>Balance also needs to reflect site specific constraints and constraints affecting</p> | <p>Castlepride Ltd, Segro</p> | <p>Change proposed. This has been included in the policy, but text has also been</p> |

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| development feasibility and viability and other 'non infrastructure' planning obligations | | inserted into the supporting text to clarify that site specific constraints such as land contamination should impact land values and that the costs for addressing these issues should not necessarily be borne through reduced planning obligations or sustainability standards, in accordance with the Affordable Housing and Viability SPG. |
| Should recognise the potential for some developments to deliver benefits-in-kind and where appropriate that such benefits may offset the liabilities and planning obligations listed in the policy | Castlepride Ltd | No change proposed. 'In-kind' contributions are still a form of planning obligation and do not need to be drawn out explicitly within the policy or supporting text. |
| Support Policy DI1a) | Mayor of London, TfL, Segro, David Craine | Noted. |
| The Cargiant site is being expected to provide a significant amount of social infrastructure to serve the needs of the wider area, including a primary school, sports centre, community centre and health centre. For this to be acceptable, there needs to be a greater acknowledgement of the viability of delivery on this site | Old Oak Park Ltd | No change proposed. It is not considered necessary to identify this site in particular within this policy; however, the Local Plan recognises in Policy DI1 and in policy H2 (affordable housing) that there is a need to balance affordable housing with other matters affecting viability, such as infrastructure delivery. In Policy H2's supporting text, Old Oak North is identified as a particular location where there will be significant infrastructure requirements |
| D1a) is a critical issue and this point should be referenced throughout the Local Plan | Old Oak Park Ltd | No change proposed. It is not felt necessary to repeat points continuously throughout the Local Plan. Policy DI1 is a cross-cutting policy and by consequence, applies to all sites within the OPDC area. |
| Do not need the word 'appropriately'. Suggest its deletion | Hammersmith and Fulham Council | Change proposed. OPDC agrees and has removed the word from the policy. |
| Acknowledge that there are associated costs with development, however, these | Hammersmith and Fulham Council | No change proposed. OPDC considers that the wording of the policy already |

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| <p>are essential in delivering the overarching Spatial Vision and bring benefits to the applicant. This balance should be acknowledged in the text.</p> | | <p>acknowledges this balance, which also includes the need for deliverability and timely regeneration of the area. This accords with the NPPF and presumption in favour of sustainable development.</p> |
| <p>Measures to ensure balancing priorities and securing infrastructure delivery seem vague.</p> | <p>Friary Park Preservation Group</p> | <p>No change proposed. The policy recognises the need to balance priorities to support the timely regeneration of the area. The exact balance would need to be judged on a case by case basis.</p> |
| <p>The Plan is not sound because it has not set out a clear position on infrastructure costs</p> | <p>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</p> | <p>No change proposed. The Plan covers a 20 year period and given these timescales, in many instances, infrastructure costs are unknown. The IDP identifies infrastructure requirements and where known, costs have been included. Policy DI1 sets out how OPDC will work proactively with stakeholders to secure the infrastructure necessary to support the sustainable regeneration of the area. This is not limited to planning obligations and CIL and recognises there are a variety of funding sources that may need to be explored to make support the delivery of infrastructure.</p> |
| <p>Concerned that there is not a clear approach to addressing the infrastructure funding gap and that this will result in greater reliance on developer contributions and will compromise development quality</p> | <p>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</p> | <p>No change proposed. The policy sets out the expectation that there would need to be a balance between different priorities. As outlined in the policy and supporting text, OPDC are investigating many avenues for the funding of infrastructure and is not placing an over-reliance on developer contributions.</p> |
| <p>There is not a contingency plan if there are delays to infrastructure delivery or if infrastructure proves too expensive to deliver</p> | <p>Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick</p> | <p>Change proposed. The purpose of a Local Plan is to set out a long-term strategy for the regeneration of the area. The Local Plan is supported by Key</p> |

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| | Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton | Performance Indicators which will monitor the delivery of policies. If this monitoring shows OPDC's policies are not being achieved, OPDC will look to undertake a review of the Local Plan. however, text has been added to the supporting text to Policy SP10 identifying that decisions not to proceed with the delivery key pieces of critical infrastructure, required to enable the attainment of homes and jobs targets, would trigger a need for a review of OPDC's Local Plan policies |
| The policy refers to an appropriate balance, but does not say what is appropriate or how it could be achieved | 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 | Change proposed. The wording in the lead in to the policy clarifies that it is to support the successful regeneration of the area and wording has been added to the supporting text that to clarify that any balance would need to deliver on the principles of sustainable development outlined in the NPPF. |
| Support DI1b) | 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 is not justified. It opens on OPDC to pressure from speculative developers to push applications through the system, with 'timely' schemes prioritised in a way that is given excessive weight in decision-making | Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, 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. As set out in the policy, there is a need to balance these issues and OPDC would not seek to prioritise one strand if it were to result in unsustainable development. Wording has been inserted in the supporting text to clarify that any balance of these issues would still need to ensure that development is sustainable and upholds the |

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| | | principles of sustainable development set out in the NPPF. |
| Result of policy will distort any properly balanced programme of phased development in which social and community infrastructure is built provided in time to serve the needs of incoming residents | Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, 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. In accordance with Policy SP10 and Policy DI2, OPDC would always require/secure infrastructure to ensure that it is provided in time to serve the needs of the new population. |
| Additional wording should be added where private sector operators are involved in infrastructure on which the public will rely (e.g. energy services, communal heating systems) planning approvals will ensure that future management arrangements have adequate public oversight | Old Oak 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. Electricity is regulated. Heat is unregulated, but policy EU10 requires proposals to provide evidence of appropriate management mechanisms to ensure that end customers are protected in respect of the price of energy provided and the level of service. Whilst the heating industry is not regulated in the same way as other utilities, OPDC, as developer/coordinator, is working to ensure any district heating network delivered joins the UK's Heat Trust scheme. The UK's Heat Trust puts a common standard in the level of quality and protection as you would expect from other utilities and provides customers free access to the Energy Ombudsman. |
| Support Policy DI1 | Education and Skills Funding Agency | Noted. |
| The plan is not effective because it does not provide evidence or give clarity that balancing priorities and securing infrastructure delivery will actually secure affordable housing, decent places, sustainable community facilities as well as the infrastructure necessary to deliver the plan | 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 appropriate balance needs to be judged on a case by case basis. The Affordable Housing Viability Assessment shows that on some sites with higher values and medium infrastructure requirements, targets will be attainable, but on others that may have lower values, |

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| | | <p>higher infrastructure costs and higher on-site constraints, they will not. This balance or recognition of viability is enshrined in the NPPF and the need for viability to be a factor in affordable housing delivery is recognised in the NPPF, London Plan and in policies SP4 and H2 of OPDC's Local Plan. Policy DI1 sets out that OPDC will pursue many other avenues for the funding of infrastructure than purely S106/CIL and that the expectation is not that development should be funding all the infrastructure required to deliver the spatial vision.</p> |
| <p>The plan does not include a clear financial strategy for addressing the funding gap</p> | <p>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</p> | <p>No change proposed. It is not the role of the Local Plan to develop a clear cashflow funding model for all infrastructure delivery. As identified in the policy, there will be a need for a variety of funding sources to deliver infrastructure. The funding gap alluded to within the Development Infrastructure Funding Study did not consider all funding sources or cashflow or growth/inflation.</p> |
| <p>Do not support the use of tax increment financing unpredictable and imprudent in the face of multiple uncertainties regarding the UK and London economies, as well as additional debt burdens already accruing to the Mayor and this money is needed by local councils for services.</p> | <p>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</p> | <p>No change proposed. The Local Plan does not state that this funding and financing option will be pursued, but it is one option at OPDC's disposal. TIFs have been utilised with success in the Vauxhall Nine Elms Battersea project to fund the Northern Line Extension, so there is a precedent for their use on major development projects in London. OPDC will produce a separate delivery strategy, sitting outside of planning, which would assess available options and make recommendations to</p> |

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| | | OPDC Board on the preferred sources of alternative funding and financing. |
| The Whole Plan Viability Study shows that affordable housing commitments can only be met on some sites and then only on the basis of 30% LAR and 70% intermediate, which does not meet OAN | 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. When setting an affordable housing target, it is not necessary to demonstrate that the target can be delivered on all sites. OPDC considers that the assumptions behind the AHVA and Whole Plan Viability Study are appropriate given the strategic nature of the assessment of affordable housing viability undertaken to support the Local Plan and that this assessment accords with the requirements of the National Planning Policy Framework ('NPPF') and the Local Housing Delivery Group guidance 'Viability Testing Emerging Local Plans: Advice for planning practitioners' (June 2012) and is comparable to other viability assessments undertaken by other Local Planning Authorities in the development of Local Plans. The 30% - 70% split between LAR and intermediate housing does meet OAN. Further detail is set out in OPDC's Housing Evidence Statement supporting study. |
| The deliverability of the plan is undermined by the lack of control of land. | 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. A significant proportion of the land is in public sector ownership and OPDC is acting as a coordinator of this public sector land. OPDC may acquire some or all of this public sector land through the MOU with central government. OPDC also has CPO powers, as set out in policy D14. |
| The current uses in the area impact of sales values, meaning there is less money | Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, | No change proposed. It is not clear what is meant by this. Existing Use Values (EUVs) |

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| for affordable housing and s106 contributions and that proposals are for higher densities than is acceptable | Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton | range across the site. Some sites have relatively low EUVs whilst others have relatively high EUVs. OPDC considers that EUVs are broadly comparable with many other regeneration sites in London. The EUVs of different sites have been factored into OPDC's viability work supporting the Local Plan - specifically the Affordable Housing Viability Assessment and the Whole Plan Viability Study. |
| Recent schemes have not achieved affordable housing levels set out in the Local Plan, and have not provided adequate contributions to 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 | Noted. Affordable housing is subject to viability, in accordance with Policies SP4 and H2 and infrastructure contributions were secured in accordance with the S106 tests. |
| There needs to be clear recognition that where major development schemes are required to provide significant new infrastructure this will reduce the amount of affordable housing that can be viably provided. | Old Oak Park Limited | No change proposed. The supporting text in Policy SP4, H2 and DI1 recognise this. |

Regulation 19(2) consultation

| What is the issue? | Who raised the issue? | What are we doing to address the issue? |
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| CIL and Section 106 funds should be spread across the area impacted by development. OPDC should provide financial support to communities | Thomas Dyton; Wells House Road Residents Association; Harlesden Neighbourhood Forum | Noted. Policy DI1 sets out OPDC's strategic approach to planning contributions. Further guidance will be provided in OPDC's forthcoming Planning Obligations SPD and through the development of OPDC's CIL Charging Schedule. |
| LBHF request greater involvement in negotiating S106 Planning Agreements, agreeing Heads of Terms and the spending of CIL and S106 monies arising from | London Borough of Hammersmith and Fulham | No change proposed. OPDC's approach to involving the boroughs in Section 106 agreements will be set out in OPDC's forthcoming Planning |

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| <p>development. The involvement of host boroughs in this process should be referenced in Policy DI1.</p> | | <p>Obligations SPD which will be consulted on in due course. The allocation of CIL monies is set out through OPDC's Regulation 123 List, which is produced separately to the Local Plan.</p> |
| <p>The preparation of a Planning Obligations SPD is not mentioned in this Policy. Given LBHF is the infrastructure provider for a number of service areas, LBHF would welcome being involved in the preparation of this document ahead of the start of public consultation.</p> | <p>London Borough of Hammersmith and Fulham</p> | <p>Noted. Paragraph 11.11 confirms that a planning obligations SPD will be developed. This will be consulted on in due course, including with the boroughs.</p> |
| <p>The level of Section 106 and CIL contributions sought on individual sites should ensure that new development remains viable and that the market is appropriately incentivised to bring schemes forward. Land owners and tenants at Park Royal should not be overburdened and penalised by being required to make significant contributions to fund ambitious infrastructure plans at Old Oak.</p> | <p>Aberdeen Standard Investments</p> | <p>Noted. Policy SP10 requires development to contribute appropriately and proportionately towards required infrastructure. Policy DI1 also seeks to balance a range of priorities to support the successful regeneration of the OPDC area.</p> |
| <p>OPDC's Local Plan contained little consideration of financing mechanisms and it wasn't clear how developments that would take place over more than two decades would be funded. Research is available on financing options including land value capture mechanisms. When there has been strong political will and clear leadership, land value capture mechanisms have been used successfully to fund initial development. The OPDC needs to give careful consideration to retaining the ownership of sites, in order to secure the permanent income to meet the long-term</p> | <p>Professional Land Research Group and Coalition for Economic Justice</p> | <p>No change proposed. It is not the role of the Local Plan to develop a clear cashflow funding model for all development delivery. The Plan covers a 20 year period and given these timescales, in many instances, infrastructure costs are unknown. The IDP identifies infrastructure requirements and where known, costs have been included. Policy DI1 sets out how OPDC will work proactively with stakeholders to secure the infrastructure necessary to support the sustainable regeneration of the area. This is not limited to planning obligations and CIL and recognises there are a</p> |

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| costs. | | variety of funding sources that may need to be explored to make support the delivery of infrastructure. |
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Summary of Relevant Evidence Base

OPDC evidence base

| Supporting Study | Recommendations |
|---|---|
| Development Capacity Study | <ul style="list-style-type: none"> • Within the plan period, the OPDC area has capacity to deliver 20,100 new homes and space for 40,400 new jobs. |
| Development Infrastructure Funding Study | <ul style="list-style-type: none"> • The funding gap and cashflow needs addressing. Steps could be taken to narrow the gap identified, and overcome cashflow difficulties, as discussed above. • Enterprise Zone status and a TIF should be investigated, using the model established at Vauxhall Nine Elms Battersea (VNEB). • Local Development Orders and Mayoral Development Orders could be considered in order to give planning certainty to developers. Similar methods were used at Canary Wharf, and were an important component in encouraging investment. • The business case for development could be developed: we suggest that the OPDC may wish to work further on the economic benefits that investment, particularly in transport, may bring. This would allow the generation of a funding case to Government, and may form part of a TIF application. • CIL and S106 policy needs to be put in place as early as possible, to allow developers to bid for sites in the knowledge of what they will be paying in infrastructure contributions – allowing them to pay the ‘right’ price for the land they need. In advance of CIL and S106 policy, policy intentions should be communicated consistently and clearly. |
| Social Infrastructure Needs Study | <ul style="list-style-type: none"> • 1 primary school • 1 secondary school • 1 health hub • Expansions to Central Middlesex Hospital and Hammersmith Hospital • 4 supernurseries • 2 community hubs • 2 sports centres |
| Infrastructure Delivery Plan | <ul style="list-style-type: none"> • Deliver a range of new and enhanced transport, green, utilities and social infrastructure within, and where appropriate outside, the OPDC area. • The IDP will be used by the OPDC to assist in the delivery of projects and assist in identifying and negotiating appropriate Section 106 contributions from developers and for the prioritisation of the use of other monies received as developer contributions e.g. Community Infrastructure Levy (CIL) by OPDC. |

Rationale for any non-implemented recommendations

| Supporting Study | Rationale for not including |
|------------------|-----------------------------|
| | None |

Other evidence base

| Supporting Study | Recommendations |
|------------------|--|
| | <ul style="list-style-type: none">• None |

Policy DI2: Timely Delivery and Optimised Phasing

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|--|
| 177 | It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. |

National Planning Practice Guidance (NPPG)

| Policy / paragraph reference | Policy and paragraph text |
|---|---|
| https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment | Housing and economic land availability assessment |

Local Plans

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|---|
| 018 | A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the <u>viability of development</u> . |

London Plan (2016) Policies

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|---|
| 8.1 | A The Mayor will work collaboratively to deliver a positive approach to enabling new development in London, optimising land use and promoting/enabling locations for strategic development. |

Draft New London Plan (2017) Policies

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|---|
| GG2 | <p>To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:</p> <p>A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.</p> <p>B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.</p> <p>C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character.</p> <p>D Protect London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.</p> <p>E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.</p> <p>F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.</p> |
| DF1 | <p>Delivery of the Plan and Planning Obligations</p> <p>A Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery.</p> <p>B If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application.</p> <p>C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor’s Affordable Housing and Viability SPG.</p> <p>D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:</p> <ol style="list-style-type: none"> 1) Recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth. <p>E Boroughs are also encouraged to take account of part D in developing</p> |

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| | their Community Infrastructure Levy Charging Schedule and Regulation 123 list. |
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Supplementary Planning Guidance (SPG)

Old Oak and Park Royal OAPF (2015)

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|--|
| Principle DL1 | Proposals must: <ul style="list-style-type: none"> a. Ensure a comprehensive approach to the regeneration of the area, development that restricts the ability to secure the comprehensive regeneration of the area will not be supported; b. Demonstrate joined up working between key stakeholders such as the public and private sector landowners, local authorities, statutory undertakers and infrastructure providers and adjacent landowners and developers; c. Optimise development and accelerate delivery of public sector assets by ensuring that public sector landowners are joined up and have an aligned strategy; and d. Kick start regeneration in advance of the planned Old Oak Common station in 2026; |
| Principle DL2 | Proposals should provide the necessary infrastructure to support the needs of development. |

Local Plan Regulation 18 Draft Policy Options

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|--|
| | No alternative policy options were considered. |

Key Consultation Issues

Regulation 18 consultation

| What is the issue? | Who raised the issue? | What are we doing to address the issue? |
|---|---|---|
| Phasing of development and infrastructure: A range of respondents commented on the phasing of development across the area. Several private landowners expressed a desire to bring | Old Oak Park (DP9), Canary Wharf PLC, Brent Council, Montagu Evans (for a private land owner, Quod (for a private land owner) | Change proposed. The phasing diagrams and Development Capacity Study have been updated to take on board comments from stakeholders. Policy SP10 supports development being brought forward in advance |

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| <p>their sites forward sooner than set out within the Local Plan.</p> <p>Members of the public were more concerned that the planning for the longer term phases was occurring too soon and that the infrastructure was not in place to support the amount of development that was occurring in earlier phases. Conversely developers claimed that infrastructure was being front-loaded and that this was not required.</p> | | <p>of the phasing identified.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan (IDP) which identifies what infrastructure is needed, when and sources of funding/financing.</p> <p>Further work has been undertaken across a number of studies to identify infrastructure requirements and the phasing of infrastructure to support the delivery of homes and jobs and this has been included in the IDP.</p> |
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Regulation 19(1) consultation

| What is the issue? | Who raised the issue? | What are we doing to address the issue? |
|---|--------------------------------|---|
| Reference to the delivery of the Elizabeth Line depot within the plan period should be removed. | TfL | Change proposed. The table has been revised to identify that the Elizabeth Line depot is not identified as coming forward in the plan period but that development around it should provide for non-preclusion and that OPDC will support its potential earlier delivery if proven to be feasible. |
| List of landowners should differentiate between freehold and leasehold. | TfL | No change proposed. The table provides a high level summary and is not considered necessary to draw out freehold and leasehold arrangements. |
| Need to recognise that long-term redevelopment of operational rail facilities would need to take account of future operational needs. | TfL | Change proposed. Wording has been inserted in the supporting text to acknowledge this. |
| Need to recognise that any de-designation of rail sites would be subject to standard industry procedures and consultation. | TfL | No change proposed. This process sits outside of planning policy. |
| Measures to ensure timely delivery and optimised phasing seem vague. | Friary Park Preservation Group | No change proposed. OPDC considers the policy limbs to be effective and specific. |

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| <p>This is an important policy for setting out the draft timetable for various parts of the site</p> | <p>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</p> | <p>Noted.</p> |
| <p>Effective organisation and monitoring of this programme will be essential</p> | <p>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</p> | <p>Noted. Delivery will be monitored through OPDC's Annual Report, which includes OPDC's Authority Monitoring Report.</p> |
| <p>The policy should refer to minimising disruption during construction</p> | <p>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</p> | <p>No change proposed. This is dealt with in policies SP10 and in T8.</p> |
| <p>The policy gives excessive priority to early implementation which will compromise affordable housing and open space provision.</p> | <p>Old Oak Interim Forum, Grand Union Alliance, Midland Terrace Residents Association, 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</p> | <p>No change proposed. Schemes being implemented early would still need to accord with planning policy requirements for open space provision and affordable housing.</p> |
| <p>The table should include the size of each site, the anticipated density and the anticipated range of building heights</p> | <p>Old Oak 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</p> | <p>No change proposed. Further details on density have been added to SP9 supporting text and the associated figure shows the locations where tall buildings are acceptable in principle. Building height ranges, where appropriate, have been added to the place policies. Building height ranges are only specified where there is a</p> |

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| | | <p>need for more specific policy guidance in sensitive locations and where OPDC has undertaken more detailed design work to support such a policy. It is not considered appropriate to set height ranges on a place-wide basis as in many parts of the area, the exact nature of development that might come forward is not yet known and to set a cap on building heights would be inflexible.</p> |
| <p>Object to the policy as it will encourage ill-considered and speculative development</p> | <p>Old Oak Interim Forum, 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</p> | <p>No change proposed. OPDC does not consider that that the policy will promote ill-considered and speculative development. This is just one policy in the Local Plan. Compliance with this policy does not mean a scheme will be approved. Schemes must be assessed against all relevant development plan policies and other relevant material planning considerations.</p> |
| <p>Support Policy DI2</p> | <p>Education and Skills Funding Agency</p> | <p>Noted.</p> |
| <p>Approving schemes early results in negative consequences. OPDC have approved schemes recently that will have unacceptable levels of noise and air pollution</p> | <p>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</p> | <p>No change proposed. This comment relates to specific planning applications. Applications have been determined in accordance with para 14 of the NPPF. OPDC also supports the early delivery of sites, but only where they accord with relevant development plan policies and other material planning considerations. Schemes would still be required to accord with other relevant planning policies, including policies dealing with noise and air quality. It is not felt necessary to repeat the need for proposals to accord with all other relevant planning policies and material considerations within this policy.</p> |

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 |
|---|--|
| Development Capacity Study | <ul style="list-style-type: none"> • Within the plan period, the OPDC area has capacity to deliver 20,100 new homes and space for 40,400 new jobs. |
| Development Infrastructure Funding Study | <ul style="list-style-type: none"> • Planning policy and strategy must remain flexible enough to cope with changing market and economic conditions – for example, perhaps by delivering lower levels of affordable housing in the early phases in order to pump-prime infrastructure delivery with increased levels of funding. • A very practically orientated project delivery ‘roadmap’ needs to be written which would identify tasks on the critical path, set dates for those issues to be resolved, and clarify delivery roles and responsibilities; focus head-on on how any problems will be resolved; and define issues in time sequence, which would allow the focusing of resources on short term issues and a process of active planning for medium term issues. This would also help the political process by clarifying decisions that need to be taken, when they need to be taken, and what the ramifications of choices are. |
| Infrastructure Delivery Plan | <ul style="list-style-type: none"> • Deliver a range of new and enhanced transport, green, utilities and social infrastructure within, and where appropriate outside, the OPDC area to meet demands of the development. • The IDP will be used by the OPDC to assist in the delivery of projects and assist in identifying and negotiating appropriate Section 106 contributions from developers and for the prioritisation of the use of other monies received as developer contributions e.g. Community Infrastructure Levy (CIL) by OPDC. |
| Social Infrastructure Needs Study | <ul style="list-style-type: none"> • 1 primary school • 1 secondary school • 1 health hub • Expansions to Central Middlesex Hospital and Hammersmith Hospital • 4 supernurseries • 2 community hubs • 2 sports centres |
| Utilities Study | <ul style="list-style-type: none"> • The pace, timing and location of specific plots that are released for development, in addition to their intended mix, ownership and decision-making responsibility, creates a complex challenge for the overall configuration of essential enabling infrastructure, energy assets and utility systems. There is a progressive |

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| | <p>opportunity, which should be reviewed cyclically, to establish core assets and to optimise systems in order to deliver:</p> <ul style="list-style-type: none"> • Resource efficiencies • Cost efficiencies (reducing the capital outlay for new infrastructure assets) • Innovation and technology advancement (delivering an international exemplar of smart enabled development) |
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Rationale for any non-implemented recommendations

| Supporting Study | Rationale for not including |
|-------------------------|------------------------------------|
| | None |

Other evidence base

| Supporting Study | Recommendations |
|-------------------------|---|
| | <ul style="list-style-type: none"> • None |

DI3: Stakeholder Engagement and Being a Proactive Planning Authority

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|--|
| 17 | Planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. |
| 66 | Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably. |
| 69 | Local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning |
| 71 | Local planning authorities should take a positive and collaborative approach to enable development to be brought forward under a Community Right to Build Order, including working with communities to identify and resolve key issues before applications are submitted |

National Planning Practice Guidance (NPPG)

| Policy / paragraph reference | Policy and paragraph textss |
|--|--|
| Paragraph: 017 Reference ID: 12-017-20140306 Revision date: 06 03 2014 | Who should be involved in preparing a Local Plan? Local planning authorities will need to identify and engage at an early stage with all those that may be interested in the development or content of the Local Plan, including those groups who may be affected by its proposals but who do not play an active part in most consultations. Those communities contemplating or pursuing a neighbourhood plan will have a particular interest in the emerging strategy, which will provide the strategic framework for the neighbourhood plan policies. The local planning authority will also need to ensure that it works proactively with other authorities on strategic cross boundary issues in line with the duty to cooperate. |

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| | <p>Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out specific bodies or persons that a local planning authority must notify and invite representations from in developing its Local Plan. The local planning authority must take into account any representation made, and will need to set out how the main issues raised have been taken into account. It must also consult the Strategic Environmental Assessment consultation bodies on the information and level of detail to include in the sustainability appraisal report.</p> <p>Section 18 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement, which should explain how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications. The Statement of Community Involvement should be published on the local planning authority's website.s</p> |
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London Plan (2016) Policies

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|---|
| 7.1 | <p>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.</p> <p>G Boroughs should work with and support their local communities to set goals or priorities for their neighbourhoods and strategies for achieving them through neighbourhood planning mechanisms</p> |

Draft New London Plan (2017) Policies

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|---|
| GG1 | <p>To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:</p> <p>A Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city.</p> <p>B Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.</p> <p>C Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish.</p> <p>D Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.</p> |

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| | <p>E Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.</p> <p>F Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.</p> |
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Supplementary Planning Guidance (SPG)

Planning for Equality and Diversity in London SPG (2007)

| Policy / paragraph reference | Policy and paragraph text |
|-------------------------------------|---|
| SPG Implementation Point 2a: | Promoting equality in planning processes Boroughs are recommended to have policies in place so that planning applications can be refused, amended or approved with conditions if issues of diversity and equality have not been properly addressed. In addition, boroughs are advised also to consider setting out further information on planning for diversity and equality in detailed guidance documents which support their planning policies. |

Local Plan Regulation 18 Draft Policy Options

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|--|
| | No alternative policy options were considered. |

Key Consultation Issues

Regulation 18 consultation

| What is the issue? | Who raised the issue? | What are we doing to address the issue? |
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| Transparency/ Planning applications: Various comments were received in regards to the transparency of the OPDC of particular note were requests for information of the land transfer, the need for a transparent spend | Hammersmith and Fulham Council, The Hammersmith Society, Old Oak Interim Forum, Wells House Road Resident's Association, 2 local residents | Change proposed. Following comments, OPDC has updated its Statement of Community Involvement to make the requirements of developers both pre and post submission of planning applications clearer. |

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| <p>process in regards to s106 and CIL and clarification of the planning applications process for OPDC.</p> | | <p>Details on s106 and CIL spend would be published as part of OPDC's Authority Monitoring Report (AMR).</p> <p>Details about the land transfer are provided on OPDC's website, but this is not a matter related to the Local Plan.</p> |
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Regulation 19(1) consultation

| What is the issue? | Who raised the issue? | What are we doing to address the issue? |
|--|---|--|
| <p>Disappointed that the Old Oak Neighbourhood Area applied for by the Interim Forum was not designated by OPDC. This reflects poorly on OPDC's community engagement.</p> | <p>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, Oonagh Heron,</p> | <p>Noted. This does not have a direct bearing on the Local Plan. Details on OPDC's consideration of the appropriateness of the neighbourhood area can be found on OPDC's website at: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/planning-old-o-10</p> |
| <p>Support policy DI3 and commitment to regularly review and updates its Statement of Community Involvement</p> | <p>Association for Consultancy and Engineering (ACE)</p> | <p>Noted.</p> |
| <p>D13 (d) envisages supporting community management, without any implementation proposals detailed. This could be explored further in this policy. This should include support through, planning gain funding and collaborative working with the boroughs for the Community Right to Bid, Community Asset Transfer and establishment of development trusts.</p> | <p>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</p> | <p>Change proposed. OPDC considers the wording in the policy to provide sufficient detail, but further examples of community delivery and management models have been provided in the supporting text and support for community build initiatives has been inserted into the policy.</p> |
| <p>The Shield site is not in public ownership as HS2 have agreed to transfer land back to private landowners</p> | <p>Osbourne Investments Limited and Quattro Holdings Limited</p> | <p>Change proposed. The sites being acquired by HS2 for construction purposes will be shaded a separate colour.</p> |
| <p>Para 11.31 and 11.32 should reference RBKC and the other Western Riverside</p> | <p>Royal Borough of Kensington and Chelsea</p> | <p>No change proposed. Reference to working with a wider network of local authorities is already</p> |

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| Waste Planning Authorities and the extent of cooperation with these bodies. | | included in this paragraph and further details relating to discussions between OPDC and the WRWA planning authorities are included in OPDC's Duty to Cooperate Statement. |
| Support Policy DI3 | Hammersmith and Fulham Council, Friary Park Preservation 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. |
| Support Policy DI3e) | Hammersmith and Fulham Council | Noted. |
| OPDC are not being a proactive planning authority because they did not approve the Old Oak Neighbourhood Area as submitted and instead significantly reduced the boundary. | Nicky Guymmer, Bruce Stevenson, Mark Walker | No change proposed. The designation of the Neighbourhood Area does not relate directly to the Local Plan. The reasons for revising the boundary are set out further on OPDC's website: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/planning-old-o-10 |
| Support aspiration of policy but the tendency to date has been to ignore the views of the local authorities, community groups and residents | 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 disagrees and significant changes have been made between the Reg 18 Local Plan and the 1st Reg 19 Local Plan and the 1st Reg 19 Local Plan and 2nd Reg 19 Local Plan, to address concerns from community groups. |
| OPDC has a duty to cooperate with local authorities, but this has not been upheld in respect of planning applications | 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 | No change proposed. The Duty to Cooperate does not relate to planning applications. In any case, neighbouring local authorities have been consulted on planning applications where appropriate. |

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| | Hollender, Jeremy Aspinall, Thomas Dyton | |
| Disappointed with OPDC's negative attitude to the formation of neighbourhood plans, to which the Local Plan merely pays lip service. | 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. As stated in Policy D13 and paragraph 11.36 of the supporting text OPDC is committed to working with both emerging and established Neighbourhood Forums. It is unclear what additional information OPDC is expected to include on Neighbourhood Plans other than that OPDC will provide assistance to communities developing them. |
| Policy is not effective because the SCI is weak on pre-application engagement. Planning forums should be set up and meetings should be set up between applicants and community groups | Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, 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 commitment in the Local Plan is to undertake regular reviews of the SCI, which is a separate document to the Local Plan. The SCI was first published in 2016. OPDC undertook a review of the SCI in 2017, to address comments from local community groups, particularly in relation to pre-application engagement and a revised version was published during 2017. OPDC has therefore upheld this policy to date and will continue to do so. |
| The policy is not effective because OPDC did not designate a neighbourhood area application as submitted. | Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, Jason Salkely, Dave Turner, 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 designation of the Neighbourhood Area does not relate directly to the Local Plan. The reasons for revising the boundary are set out further on OPDC's website: https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/planning-old-o-10 |
| Providing support to forums is a statutory requirement of a LPA so does not warrant having a policy. | Old Oak 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. It is considered important to have a statement in the Local Plan setting out that OPDC will provide this support. Other community groups have asked for even further detail on how OPDC will support neighbourhood planning so OPDC considers the current content within the policy strikes the appropriate balance |

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| | | referencing that support will be in place. |
| The policy is not effective because OPDC's engagement has been lacking including not sending regular newsletters to community groups | Old Oak Interim Forum, TITRA, Midland Terrace Residents Association, 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. Community newsletters do not relate to statutory planning processes. In the production of the Local Plan, OPDC's stakeholder engagement has far exceeded statutory requirements. Details on consultation activities undertaken by OPDC are set out in OPDC's Statement of Consultation. |
| OPDC has not fulfilled its Policy DI3b or Statement of Community Involvement with required actions, in various ways. | 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 commitment in the Local Plan is to undertake regular reviews of the SCI, which is a separate document to the Local Plan. The SCI was first published in 2016. OPDC undertook a review of the SCI in 2017, to address comments from local community groups, particularly in relation to pre-application engagement and a revised version was published during 2017. OPDC has therefore upheld this policy to date and will continue to do so. |
| The Education and Skills Funding Agency should be referenced as an infrastructure provider in 11.33b) | Education and Skills Funding Agency | Change proposed. Work with the Education and Skills Funding Agency has been referenced in the supporting text. |
| Policy is not sound because OPDC has not actively encouraging participation from local community groups in planning applications and have not addressed their concerns | 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 requirements for engagement on planning applications is not directly dealt with through the Local Plan. Engagement on planning applications is governed through the Development Management and Procedure Order (2015). OPDC's Statement of Community Involvement also sets out further procedural guidance in relation to planning applications, particularly support for early pre-application engagement with community groups. OPDC considers that OPDC has encouraged early engagement with local community groups. OPDC does |

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| | | not consider this to therefore impact on the soundness of Policy D13. |
| Welcome changes that were undertaken to the SCI, but these requirements have not been carried into the Local Plan | 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. Policy D13 is a high level policy dealing with engagement with all stakeholders - not just community groups. Detailed arrangements for engagement with residents and community groups are set out in OPDC's SCI, but Policy D13 does set out that OPDC will keep this document under regular review. |
| Requirements outlined in the SCI have not been met, such as developer forums and proper early engagement from developers | 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. These comments relate to the SCI rather than the Local Plan. In relation to early engagement, OPDC cannot require developers to undertake pre-application engagement, only strongly encourage it through the SCI. In respect of developer forums, these have been established. |
| Text from the SCI on early engagement with communities should be transposed into the Local Plan | 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. These are detailed matters that are appropriately dealt with in the SCI. It is not considered appropriate to repeat this in the Local Plan. The Local Plan does reference the importance of engagement with communities, both pre and post submission of planning applications within Para 11.35. |
| Policy should state that pre-application discussions between OPDC and developers and viability assessments will be published | 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 need for published viability assessments is covered in OPDC's Validation Checklist. Publication of pre-application comments on the submission of planning applications is a detailed matter, most appropriately dealt with through the SCI and this requirement will be included within the next update to the SCI. |
| S106 contribution discussions should be published in advance of the conclusion of pre-application discussions | Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, | No change proposed. OPDC's SCI notes at para 3.9 that until an application is submitted, pre-application advice and discussions, including discussions on S106 contributions are confidential. |

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| | Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton | OPDC requires Planning Obligation Heads of Terms to be submitted to meet OPDC's validation requirements in its Validation Checklist. |
| Policy is not sound as it does not set out how forums or community ownership arrangements will be supported and funded. It should state that CIL or S106 contributions will be considered as funding sources. | Grand Union Alliance, Penecostal City Mission, 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. Wording has been inserted into the supporting text to clarify that OPDC will secure appropriate funding opportunities with developers, service providers and community groups for community ownership initiatives. The text does not limit this solely to s106 and/or CIL as there will be other funding opportunities. Funding arrangements for forums are dealt with by Locality on behalf of CLG. Wording on support for forums in developing their plans is already provided in the policy. |
| Should identify that CIL funding will be used to fund the implementation of neighbourhood plans | 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. Neighbourhood Plan production is funded through Locality on behalf of CLG. The allocation of CIL funding is set out through OPDC's Regulation 123 List, which is produced separately to the Local Plan. |
| Statements regarding support for Neighbourhood Forums also should include the need to be mindful of the potential for financial flows from the overall development through the share of CIL entitlements to be directed to enabling the neighbourhood plan implementation. Opposed to top-down determination of neighbourhood forums' delimitations, and request that a form of words to require a commitment to respectful working with local forums, and openness to ensuring that the required income streams for enacting the local plan are provided through sensible | 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. Once a Neighbourhood Plan has been made, legislation requires that the community are consulted on 25% of CIL captured within the Neighbourhood Area. The second point appears to relate to the designation of Neighbourhood Areas. There is separate legislation and National Planning Practice Guidance relating to the consideration and designation of Neighbourhood Areas that do not merit repetition in the Local Plan. |

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| and negotiated border delimitations. | | |
| Keen to work with OPDC on transport related issues in the area | West London Line Group | Noted. |
| Should set out that Assets of Community Value are a material consideration when determining planning applications | Pentecostal City Mission | No change proposed. ACVs are dealt with through legislation, which specifies that a building being a ACV is a material planning consideration when considering applications. OPDC does not consider that there is a need to re-state this legislation in a policy in the Local Plan. |
| Need to set out transparent information about ACV listings | Pentecostal City Mission | No change proposed. Responsibility for designating Assets of Community Value rests with the local authority rather than the local planning authority. OPDC therefore cannot provide a list of details of properties that are listed as ACVs. |
| Should make it explicit that there will be a mechanism for warranted interventions to retain assets that are already in community ownership but are under pressure from developers | Pentecostal City Mission | No change proposed. Community ownership of a premises is not a material planning consideration unless listed as an ACV. However, OPDC's Local Plan sets out a series of planning policies that seek to protect existing uses subject to certain criteria being met. This includes policies protecting social infrastructure (Policy TCC4) and public houses (Policy TCC7). |
| Should support community asset ownership | Pentecostal City Mission | No change proposed. Support for community ownership initiatives is dealt with in Policy DI3. |
| The assessment of the Local Plans viability would be aided by the analysis of business plans like the one agreed for Old Oak North, schedule for September 2017 for which there is a budgeted £0.8m set aside. | Pentecostal City Mission | No change proposed. The Business Plan work is associated with OPDC's role as a developer. OPDC is also a planning authority and there must be separation between OPDC's function as a local planning authority and as a developer. |
| Planning obligations should be used to build the capacity of community groups to enable them to contribute to the delivery of the OPDC's social infrastructure targets | Pentecostal City Mission | No change proposed. Planning obligations need to satisfy the s106 tests (as set out in the CIL Regulations) which are to be: (a)necessary to make the development acceptable in planning terms; (b)directly related to the development; and (c)fairly |

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| | | and reasonably related in scale and kind to the development. OPDC does not consider that securing contributions to directly build capacity within community groups to deliver social infrastructure would necessarily ensure that these tests are being accorded with, but the Local Plan does identify the need for development to contribute to social infrastructure to meet needs - the exact form of the delivery of this infrastructure may need to be considered on a case by case basis, but OPDC's starting point would be the requirements set out within the Infrastructure Delivery Plan (IDP). |
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Regulation 19(2) consultation

| What is the issue? | Who raised the issue? | What are we doing to address the issue? |
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| Support for continued support of neighbourhood forums | Harlesden Neighbourhood Forum | Noted. |

Summary of Relevant Evidence Base

OPDC evidence base

| Supporting Study | Recommendations |
|------------------------------------|---|
| Statement of Community Involvement | <ul style="list-style-type: none"> OPDC is committed to achieving a high level of community involvement. As a result, it has incorporated 10 ground rules which are intended to ensure a consistent and minimum standard for community involvement. These ground rules are applied to the methodologies set out to engage with communities and stakeholders in the plan making process for the Local Plan, SPDs, CIL Charging Schedule and Neighbourhood Plans. |

Rationale for any non-implemented recommendations

| Supporting Study | Rationale for not including |
|------------------|-----------------------------|
| | None |

Other evidence base

| Supporting Study | Recommendations |
|------------------|--|
| | <ul style="list-style-type: none"><li data-bbox="504 239 624 257">• None |

Policy DI4: Planning Powers and Monitoring

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|--|
| 62 | Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. They should also when appropriate refer major projects for a national design review. In general, early engagement on design produces the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel. |

National Planning Practice Guidance (NPPG)

Design

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|--|
| 035 | Design Review is a tried and tested method of promoting good design and is an effective way to improve quality. Local planning authorities should have local design review arrangements in place to provide assessment of proposals and to support high standards of design. Local authorities should, when appropriate, refer major projects for a national design review. Design review is most effective if done at the early stages of an application, and in many cases local authorities charge for this as part of a pre-application service. |

London Plan (2016) Policies

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|---|
| 7.1 | <p>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.</p> <p>G Boroughs should work with and support their local communities to set goals or priorities for their neighbourhoods and strategies for achieving them through neighbourhood planning mechanisms</p> |

Draft New London Plan (2017) Policies

| Policy / paragraph reference | Policy and paragraph text |
|------------------------------|---|
| GG2 | <p>To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:</p> <p>A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.</p> <p>B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.</p> <p>C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.</p> <p>D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.</p> <p>E Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.</p> <p>F Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.</p> |
| DF1 | <p>Delivery of the Plan and Planning Obligations</p> <p>A Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery.</p> <p>B If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application.</p> <p>C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG.</p> <p>D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:</p> <ol style="list-style-type: none"> 1) Recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth. <p>E Boroughs are also encouraged to take account of part D in developing</p> |

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| | their Community Infrastructure Levy Charging Schedule and Regulation 123 list. |
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Supplementary Planning Guidance (SPG) & Old Oak and Park Royal OAPF (2015)

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| Policy / paragraph reference | Policy and paragraph text |
| | None directly applicable |

Local Plan Regulation 18 Draft Policy Options

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| Policy / paragraph reference | Policy and paragraph text |
| | No alternative policy options were considered. |

Key Consultation Issues

Regulation 18 consultation

| What is the issue? | Who raised the issue? | What are we doing to address the issue? |
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| <p>Monitoring: Several suggestions were made regarding additional matters to monitor, including:</p> <ul style="list-style-type: none"> - the impact of the development on the existing communities; - Biodiversity; - Heritage; and - Brownfield land | <p>Hammersmith and Fulham Council, Brent Council, GiGL, Historic England</p> | <p>Change proposed. OPDC's Local Plan is supported by a range of Key Performance Indicators, set out in a supporting document to the Delivery and Implementation chapter, which will be monitored through OPDC's Authority Monitoring Report (AMR), to monitor the success of OPDC's planning policies. Policy DI3 also requires developers to submit a post-occupancy survey to support continual learning and dissemination of acquired knowledge on the success or otherwise of developed schemes.</p> |

Regulation 19(1) consultation

| What is the issue? | Who raised the issue? | What are we doing to address the issue? |
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| The monitoring and enforcement of planning powers are vague | Friary Park Preservation Group | No change proposed. OPDC considers that the policy and supporting text adequately convey the powers at OPDC's disposal. |
| Support the principle of pre-application advice but there should be earlier public consultation with communities | 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's Statement of Community Involvement sets out how OPDC will encourage developers to undertake early and meaningful pre-application engagement with local community groups. |
| Support the need for engagement with a Place Review Group, but this should be re-constituted to include representatives from the local community | 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 | Change proposed. OPDC is now establishing a Community Review Group. Reference to this has now been included in the Local Plan. |
| Support preparation of other policy guidance including SPDs | 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 KPIs are inadequate as they do not monitor things identified for monitoring in the IIA. | 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 | Change proposed. KPIs will be updated with relevant IIA monitoring indicators. Where IIA indicators are not currently proposed to be included within the Local Plan Key Performance Indicators a rationale will be proposed. |
| para 11.43 should not just refer to major planning applications but to all planning applications | Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline | Change proposed. The text referring specifically to major applications to undertake pre-application engagement has been removed. |

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| | Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton | |
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Regulation 19(2) consultation

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

Summary of Relevant Evidence Base

OPDC evidence base

| Supporting Study | Recommendations |
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| | <ul style="list-style-type: none"> None applicable. |

Rationale for any non-implemented recommendations

| Supporting Study | Rationale for not including |
|------------------|-----------------------------|
| | None |

Other evidence base

| Supporting Study | Recommendations |
|------------------|--|
| | <ul style="list-style-type: none"> None |